INDIANA WIOA UNIFIED STATE PLAN MODIFICATION

PYs 2026-2027 and 2027-2028

PUBLIC COMMENT DRAFT

CONTENTS

I. WIOA State Plan Type

Unified or Combined State Plan. *Select whether the State is submitting a Unified or Combined State Plan. At a minimum, a State must submit a Unified State Plan that covers the six core programs.*

Unified State Plan*. This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs.*

Combined State Plan*. This plan includes the Adult, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs, as well as one or more of the optional Combined State Plan partner programs identified below.*

Indiana's plan is a Unified State Plan.

II. Strategic Elements

The Unified or Combined State Plan must include a Strategic Planning Elements section that analyzes the State's current economic environment and identifies the State's overall vision for its workforce development system. The required elements in this section allow the State to develop data-driven goals for preparing an educated and skilled workforce and to identify successful strategies for aligning workforce development programs to support economic growth. Unless otherwise noted, all Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. Where requirements identify the term "populations", these must include individuals with barriers to employment as defined at WIOA Section 3. This includes displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents (including single pregnant women); and long-term unemployed individuals. Additional populations include veterans, unemployed workers, and youth, and others that the State may identify.

A. Economic, Workforce, and Workforce Development Activities Analysis

The Unified or Combined State Plan must include an analysis of the economic conditions, economic development strategies, and labor market in which the State's workforce system and programs will operate.

1. *Economic and Workforce Analysis*

A. *Economic Analysis:* *The Unified or Combined State Plan must include an analysis of the economic conditions and trends in the State, including sub-State regions and any specific economic areas identified by the State. This must include-*

> **i. *Existing Demand Industry Sectors and Occupations:*** *Provide an analysis of the industries and occupations for which there is existing demand.*

> **ii. *Emerging Demand Industry Sectors and Occupations:*** *Provide an analysis of the industries and occupations for which demand is emerging.*

*iii. **Employers' Employment Needs:*** *With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.*

i. Existing Demand Industry Sectors and Occupations

Employment is projected to grow by 135,689 jobs in Indiana between 2023-2033. The most recent projections available indicate that the number of jobs in the State will increase by just 3.9 percent between 2023 and 2033, from 3,495,635 to 3,631,324, or just 13,569 jobs annually.

Like much of the nation, over the next several years, Indiana will experience an increase in the number of workers exiting the labor force due to retirement. Labor force availability is a direct impact limiting Indiana's potential for employment growth. As of 2025, the share of the workforce 45-64 years of age was 35.2%. By 2035, the percentage of individuals 45-64 years of age that are projected to retire and begin existing in the labor force is 34.8%. The table below details Indiana's projected labor force share by age in 2030, organized by Economic Growth Region (Workforce Region or Region). Indiana's current workforce system operates in 92 counties within 12 geographically defined regions, with plans to realign regions consistent with Executive Order 25-45 (https://www.in.gov/gov/files/EO-25-45.pdf) during PY2026-2027. More information about this realignment project can be found in Sections II(c)(2) and VI(a)(1).

Indiana's current workforce development structure is shown on the map below:

Table 1: Labor Force Projection by Age 2035 (source- STATS Indiana)				
Area	16-24	25-44	45-64	65+
Economic Growth Region 1	12.8%	41.9%	38.3%	7.0%
Economic Growth Region 2	15.0%	42.6%	35.3%	7.1%
Economic Growth Region 3	15.0%	43.7%	34.7%	6.5%
Economic Growth Region 4	18.7%	41.5%	33.5%	6.3%
Economic Growth Region 5	12.5%	46.5%	34.8%	6.3%
Economic Growth Region 6	17.5%	41.2%	34.2%	7.1%
Economic Growth Region 7	17.8%	42.0%	33.3%	6.9%
Economic Growth Region 8	19.1%	39.4%	34.0%	7.5%
Economic Growth Region 9	13.2%	42.1%	36.8%	7.9%
Economic Growth Region 10	12.5%	43.6%	36.8%	7.0%
Economic Growth Region 11	14.1%	43.0%	35.9%	7.0%
Economic Growth Region 12 (Marion County)	13.7%	48.9%	31.5%	5.9%

Existing Industry Demand (2-digit NAICS)

The ten sectors in Indiana by employment size at the 2-digit NAICS (North American Industry Classification System) in 2024, are listed in Table 2: Top Sectors by Employment in Indiana, 2024, 2-digit NAICS.

Table: 2: Top industry Sectors by Employment in Indiana, 2024, 2-digit NAICS (Source Quarterly Census of Employment and Wages 2024)			
	2022	% of 2024	Annual
Sector	Employment	Employment	Average Wage
Manufacturing	523,152	16.5%	$79,292
Health Care and Social Services	484,232	15.2%	$64,057
Retail Trade	314,736	9.9%	$37,509

Accommodation and Food Services	272,563	8.6%	$23,452
Educational Services	252,292	7.9%	$53,584
Transportation & Warehousing	185,195	5.8%	$59,265
Admin, Support, Waste	172,777	5.4%	$47,376
Construction	169,547	5.3%	$77,791
Professional, Scientific, Technical	150,103	4.7%	$97,830
Wholesale Trade	134,608	4.2%	$87,639
Public Administration	134,887	4.2%	$60,684
Finance and Insurance	104,303	3.3%	$93,263
Other Services (Except Public Administration)	95,046	3.0%	$45,054
Arts, Entertainment, and Recreation	43,215	1.4%	$44,530
Real Estate and Rental and Leasing	37,574	1.2%	$61,320
Management of Companies and Enterprises	35,519	1.1%	$120,079
Information	32,700	1.0%	$72,111
Agriculture, Forestry, Fishing and Hunting	16,649	0.5%	$51,754
Utilities	15,278	0.5%	$112,990
Mining	5,190	0.2%	$87,112
Total	3,179,566	100.0%	$62,728

Table 3 benchmarks the share of employment in Indiana's top industry sectors to neighboring states in the Midwest. Manufacturing is significantly more important to Indiana's economy than at the national level, accounting for 16.5% of jobs compared to 8.7%. Indiana leads the nation in terms of manufacturing employment density. All other industries are within a percentage point of the national share of employment with the exception of Professional and Technical Services, which only accounts for 4.7% of Indiana's employment compared to 7.2% for the nation.

Table 3: Benchmark Comparison of Industry Employment Percentage, 2-digit NAICS							
Source: Census of Employment and Wages (2024)							
	IN	IL	KY	MI	OH	WI	USA

Manufacturing	16.5%	9.6%	13.0%	13.6%	12.4%	15.8%	8.2%
Health Care and Social Assistance	15.2%	14.5%	15.8%	15.5%	16.9%	15.3%	15.7%
Retail Trade	9.9%	9.5%	10.6%	10.2%	9.8%	10.1%	10.0%
Accommodation and Food Services	8.6%	8.4%	9.0%	8.6%	8.7%	8.3%	9.2%
Educational Services	7.9%	9.1%	8.3%	7.9%	7.9%	7.5%	8.5%
Administrative and Waste Services	5.4%	6.7%	5.8%	5.9%	5.40%	4.60%	5.90%
Transportation and Warehousing	5.8%	5.8%	6.90%	4.10%	5.10%	4.30%	4.90%
Construction	5.3%	3.9%	4.7%	4.5%	4.6%	3.3%	5.4%
Professional and Technical Services	4.7%	7.3%	4.5%	7.2%	5.3%	2.4%	7.0%
Public Administration	4.2%	3.4%	4.8%	4.2%	4.0%	4.7%	5.1%

Table 4 benchmarks growth rates in Indiana's top industry sectors from 2022-2024 to neighboring states in the Midwest.

Table 4: Benchmark Comparison of Percent Change, 2-digit NAICS							
Source: Census of Employment and Wages (2024)							
	IN	IL	KY	MI	OH	WI	USA
Manufacturing	-1.9%	0.0%	0.4%	-2.0%	-0.7%	-1.9%	-1.0%
Health Care and Social Assistance	3.7%	3.4%	3.9%	3.4%	3.8%	3.5%	4.4%
Retail Trade	-0.3%	-0.6%	0.5%	-0.9%	-0.7%	0.1%	-0.4%
Accommodation and Food Services	-0.4%	0.6%	0.5%	0.8%	0.6%	2.0%	0.9%
Educational Services	1.8%	2.5%	1.5%	2.4%	1.4%	1.2%	2.0%
Administrative and Waste Services	5.4%	-5.3%	5.8%	5.9%	5.4%	4.6%	-2.3%
Transportation and Warehousing	1.0%	0.4%	6.9%	0.3%	1.3%	0.0%	1.8%

Construction	4.4%	0.4%	4.1%	3.5%	4.5%	3.3%	2.3%
Professional and Technical Services	1.1%	-1.3%	1.7%	-0.8%	-0.6%	2.4%	0.4%
Public Administration	2.9%	-19.4%	3.2%	5.0%	2.5%	4.4%	3.4%

The following sections provide detailed analysis of key sectors driving Indiana's economy:

Manufacturing

The Midwest is synonymous with manufacturing and Indiana is no exception. In 2024, the manufacturing sector represented the greatest share of the Hoosier workforce with 523,152, or 16.5% of all jobs. This represents a decrease of 10,426 jobs from 2023 but is projected to increase by 1.9% over the next ten years, adding over 9,990 jobs to the Hoosier economy. According to the Quarterly Census of Employment and Wages (QCEW) data, manufacturing jobs decreased 1.9% from 2023-2024. In comparison, Wisconsin, which has the next highest percentage share of manufacturing jobs in the Midwest, had a 1.9% increase in manufacturing jobs from 2022-2024. Nationally, manufacturing employment had a decrease of 1.0%.

Health Care and Social Assistance

Health care and social assistance employment grew by 3.3% from 2019 to 2024 with an increase of 37,198 jobs. This sector growth includes physicians' offices, hospitals, and a wide range of providers. Wages in this industry increased by 3.4% in 2024 to an average weekly wage of $1,232 for an annual wage of $64,064.

Retail Trade

Similar to national trends, retail trade in Indiana has remained among one of the top sectors in the State by employment count. The 2024 employment size for the sector was 314,731. From 2019-2023 employment fell by 2,348 for a decline of -0.7 and stands at 314,736. Retail is also one of the lower paying industries with an average weekly pay of $721, an increase of 3.1% since 2023.

Accommodation and Food Services

Accommodation and food services employed 272,567 Hoosiers in 2024. in jobs. However, it is also associated with the lowest average annual salary of any other sector in the State at $23,452.

Educational Services

This sector lost employment by 1,298 from 2019-2024 for an increase of 0.5% as an industry for Indiana. In 2024 the employment level was at 252,292. This industry's wages increased by 7.4% to an average weekly wage of $1,030 or $53,560 annually in 2024.

Administrative and Support and Waste Management and Remediation Services

From 2019-2024 employment lost 17,265 jobs for a decrease of 9.1%. This industry had an average weekly pay of $911 or 3.6% increase from 2023.

Transportation and Warehousing

Transportation and Warehousing grew by 27,059 from 2019-2024 for a total employment of 185,192. This industry has also been a target for economic development for several years. This industry grew by 17.1% during this five-year period. The average weekly wages for Transportation and Warehousing grew by 2.6% to $1,140 or $59,280 annually for 2024.

Construction

The construction sector employed 169,546 Hoosiers in 2024. The Construction industry grew by 23,636 or 16.2% between 2019 and 2024. The average annual wages for this industry are $77,792 for 2024, an increase of 6.7% from 2023.

Professional, Scientific, and Technical Services

With an employment size of 150,099 in 2024, the professional, scientific, and technical services sector is among the highest paid top sectors, earning an average annual salary of $97,812 and has demonstrated continual growth over the last ten years. Jobs in this sector require a high degree of expertise and training and perform services such as architectural and engineering design services; computer services; legal advice and representation; accounting, bookkeeping, and payroll services; etc.

Public Administration

Public Administration employment data, provided by Indiana Department of Workforce Development, excludes public sector education and hospital employment. The sector had 134,887 jobs in 2024.

Existing Occupational Demand (2-digit SOC)

The top occupations in Indiana by base employment in 2021 are detailed in Table 5: Occupations by Employment in Indiana, 2021, 2-digit SOC. Annual exits are defined as annual exits from the occupation, leaving the labor force. Annual transfers are defined as annual transfers from occupation to another. Annual openings are defined as the annual number of openings for that occupation.

Table 5: Occupations by Employment in Indiana, 2021, 2-digit SOC (source: Quarterly Census of Employment and Wages 2022)

SOC	Occupation	2021 Employment	Annual Exits	Annual Transfers	Annual Openings
43-0000	Office and Administrative Support Occupations	375,641	20,094	24,693	43,392
51-0000	Production Occupations	365,463	15,723	25,984	41,823
53-0000	Transportation and Material Moving Occupations	348,145	18,737	30,499	52,032
41-0000	Sales and Related Occupations	289,296	16,902	21,923	38,462
35-0000	Food Preparation and Serving Related Occupations	259,697	23,697	27,404	53,455
11-0000	Management Occupations	251,496	9,887	12,831	23,679
29-0000	Healthcare Practitioners and Technical Occupations	195,256	6,198	5,919	13,843
25-0000	Educational Instruction and Library Occupations	152,520	7,116	7,104	15,279
13-0000	Business and Financial Operations Occupations	143,603	4,571	8,597	14,234
49-0000	Installation, Maintenance, and Repair Occupations	142,996	5,382	8,728	14,905
47-0000	Construction and Extraction Occupations	142,764	4,960	9,110	14,398
31-0000	Healthcare Support Occupations	114,117	8,069	10,131	19,866
37-0000	Building and Grounds Cleaning and Maintenance Occupations	101,643	6,462	7,640	14,637
39-0000	Personal Care and Service Occupations	66,382	4,952	7,281	13,066
15-0000	Computer and Mathematical Occupations	65,359	1,560	3,402	5,976
21-0000	Community and Social Service Occupations	63,278	2,659	3,765	7,062
33-0000	Protective Service Occupations	58,693	3,102	3,696	6,932
17-0000	Architecture and Engineering Occupations	50,588	1,440	2,367	4,142
27-0000	Arts, Design, Entertainment, Sports, and Media Occupations	45,254	2,044	2,891	5,207
19-0000	Life, Physical, and Social Science Occupations	21,262	501	1,621	2,319
23-0000	Legal Occupations	20,559	702	866	1,820
45-0000	Farming, Fishing, and Forestry Occupations	18,483	974	2,042	3,102
	Total	**3,292,495**	**1,657,314**	**228,494**	**409,631**

Rounding out the top five occupations in Indiana by employment size are:

Office and Administrative Support Occupations

With 375,641 jobs in 2021, this occupation represents the largest share of jobs in Indiana at the 2-digit SOC level. In 2021, Office and Administrative Support Occupations had the second highest total of annual exits from the labor force and faced significant transfers, or movement to a different occupation. The total annual openings in 2021 for Office and Administrative Support Occupations

was 43,392, which was the third most of any occupational group. The typical entry-level education for Office and Administrative Support Occupations is a high school diploma or equivalent. Less than 5 years of work experience is typically required for this occupation and little to no on-the-job training is required. The national annual median salary for Office and Administrative Support Occupations was $38,050 in May 2021, which was lower than the national annual median salary for all occupations of $45,760 and lower than the State annual median salary of $42,100.[1]

Office and Administrative Support Occupations in Indiana are concentrated in the following industry sectors: Government (56,850 jobs; 15.1% of total), Health Care and Social Assistance (55,619 jobs; 14.8% of total), Finance and Insurance (41,018 jobs; 10.9% of total), and Manufacturing (36,225 jobs; 9.6% of total).[2]

Production Occupations

Production Occupations represented 365,463 jobs in 2021 in Indiana. Among the top five occupations, Production Occupations has the lowest number of annual exits from the labor force (15,723 workers). The annual number of transfers for Production Occupations was 25,984 workers. This represents the number of workers choosing to leave this occupation annually. The total annual openings for Production Occupations in Indiana in 2021 was 41,823. The typical entry-level education for this occupation group is a high school diploma or equivalent. Less than 5 years of work experience is typically required for this occupation and little to no on-the-job training is required. The national annual median salary for Production Occupations was $37,710 in May 2021, which was lower than the national annual median salary for all occupations of $45,760 and lower than the State annual median salary of $42,100.[3]

Production Occupations in Indiana are concentrated in Manufacturing (306,657 jobs; 84.8% of total), Administrative and Support and Waste Management and Remediation Services (17,817 jobs; 4.9% of total), Wholesale Trade (7,416 jobs; 2.1% of total), and Retail Trade (6,714 jobs; 1.9% of total).[4]

Transportation and Material Moving Occupations

The 2021 employment size for Transportation and Material Moving Occupations was 348,145. With 30,499 workers, this occupation represents the largest number of annual transfers of any other occupation in Indiana and has the second greatest number of annual total openings (52,032 openings). The typical entry-level education for Transportation and Material Moving Occupations is a high school diploma or equivalent. Less than 5 years of work experience is typically required for this occupation and little to no on-the-job training is required. The national annual median salary for this group was $36,860 in May 2021, which was lower than the national annual median salary for all occupations of $45,760 and State annual median salary of $42,100.[5]

Transportation and Material Moving Occupations in Indiana are concentrated Transportation and Warehousing (121,067 jobs; 34.9% of total), Retail Trade (55,839 jobs; 16.1% of total), Manufacturing (48,590 jobs; 14.0% of total), and Administrative and Support and Waste Management and Remediation Services (36,220 jobs; 10.5% of total).[6]

Sales and Related Occupations

Sales and Related Occupations are the fourth largest occupation group at the 2-digit SOC level in Indiana in 2021 with 289,296 jobs. Among the top five occupations, Sales and Related Occupations had the lowest number of annual transfers, or movement to a different occupation (21,923 transfers). The annual total number of openings for this occupation group in 2021 was 38,462. The typical entry-level education for Sales and Related Occupations is a high school diploma or equivalent. Less than 5 years of work experience is typically required for this occupation and little to no on-the-job training is required. The national annual median salary for Sales and Related Occupations was $30,600 in May 2021, which was lower than the national annual median salary for all occupations of $45,760 and State annual median salary of $42,100.[7]

Sales and Related Occupations in Indiana are concentrated in Retail Trade (162,928 jobs; 58.7% of total), Wholesale Trade (28,839 jobs; 10.4% of total), Finance and Insurance (20,344 jobs; 7.3% of total), and Manufacturing (14,565 jobs; 5.2% of total).[8]

Food Preparation and Serving Related Occupations

The 2021 employment size for Food Preparation and Serving Related Occupations was 259,697 workers. This occupation group had the greatest number of annual exits (23,697) and second greatest number of annual transfers (27,404). Food Preparation and Serving Related Occupations had the greatest share of annual total openings among all 2-digit SOC occupations in Indiana in 2021 (13.0%; 53,455 openings). The typical entry-level education for Food Preparation and Serving Related Occupations is a high school diploma or equivalent. Less than 5 years of work experience is typically required for this occupation and little to no on-the-job training is required. The national annual median salary for Food Preparation and Serving Related Occupations was $28,400 in May 2021, which was lower than the national annual median salary for all occupations of $45,760 and lower than the State annual median salary of $42,100.[9]

Food Preparation and Serving Related Occupations in Indiana are concentrated in Accommodation and Food Services (208,450 jobs; 80.4% of total), Health Care and Social Assistance (13,922 jobs; 5.4% of total), Government (10,962 jobs; 4.2% of total), and Retail Trade (10,574 jobs; 4.1% of total).[10]

[1] Source: U.S. Bureau of Labor Statistics, Occupational Outlook Handbook

[2] Source: Lightcast 2023.3, Inverse Staffing Patterns, Office and Administrative Support Occupations

[3] Source: U.S. Bureau of Labor Statistics, Occupational Outlook Handbook

[4] Source: Lightcast 2023.3, Inverse Staffing Patterns, Production Occupations

[5] Source: U.S. Bureau of Labor Statistics, Occupational Outlook Handbook

[6] Source: Lightcast 2023.3, Inverse Staffing Patterns, Transportation & Material Moving Occupations

[7] Source: U.S. Bureau of Labor Statistics, Occupational Outlook Handbook

[8] Source: Lightcast 2023.3, Inverse Staffing Patterns, Sales & Related Occupations

[9] Source: U.S. Bureau of Labor Statistics, Occupational Outlook Handbook

[10] Source: Lightcast 2023.3, Inverse Staffing Patterns, Food Preparation & Serving Related Occupations

ii. Emerging Demand Industry Sectors and Occupations

Emerging Demand in Existing Industry Sectors

The top projected industry sectors in Indiana by 2033 mirror those in 2023, with the several sectors remaining the largest employed sectors in both years: manufacturing; health care and social assistance; retail trade; accommodation and food services; educational services; and administrative and support and waste management and remediation services.

Over the ten-year period, sectors that are projected to see greatest increase in employment include health care and social assistance (+43,910 jobs); accommodation and food services (+ 16,202 jobs); professional, scientific, and technical services (+23,333 jobs); transportation and warehousing (+10,286 jobs); and educational services (+7,553 jobs).

Sectors with the greatest percent change between 2023-2033 include professional, scientific, and technical services (+15.8%); arts, entertainment, and recreation (+9.2%); and health care and social assistance (+9.6%).

NAICS Code	NAICS Title	2033 Projection Employment	2023-2033 Change	2023-2033 Change %
310000	Manufacturing	543,166	9,990	1.87
620000	Health Care and Social Assistance	503,868	43,910	9.55
440000	Retail Trade	304,818	-11,036	-3.49
720000	Accommodation and Food Services	289,162	16,202	5.94
670	Self-Employed and Unpaid Family Workers, All Jobs	256,528	-1,434	-0.56
610000	Educational Services	255,392	7,553	3.05

Table 6: Top Industry Subsectors by Employment in Indiana, 2033, 2-digit NAICS

560000	Administrative and Support and Waste Management and Remediation Services	187,063	6,659	3.69
480000	Transportation and Warehousing	183,911	10,286	5.92
540000	Professional, Scientific, and Technical Services	170,996	23,333	15.8
230000	Construction	169,955	7,347	4.52
900000	Government	169,501	194	0.11
810000	Other Services (except Government)	160,391	7,132	4.65
420000	Wholesale Trade	137,039	3,521	2.64
520000	Finance and Insurance	105,848	2,296	2.22
710000	Arts, Entertainment, and Recreation	44,297	3,716	9.16
530000	Real Estate and Rental and Leasing	37,883	1,134	3.09
550000	Management of Companies and Enterprises	36,276	1,462	4.2
510000	Information	28,512	1,814	6.79
110000	Agriculture, Forestry, Fishing and Hunting	28,089	1,542	5.81
220000	Utilities	13,865	798	6.11
210000	Mining, Quarrying, and Oil and Gas Extraction	4,764	-730	-13.29
0	Total All Industries	3,631,324	135,689	3.88

Drilling deeper into the 3-digit NAICS level (i.e., subsectors), the top projected subsectors by 2033 employment include food services and drinking places (262,648 jobs); Educational Services (255,392); Ambulatory health care services (190,415 jobs); and Administrative and Support Services (175,115)

Table 7: Top 20 Industry Subsectors by Employment in Indiana, 2033, 3-digit NAICS

NAICS Code	NAICS Title	2033 Employment	2023-2033 Change	Percent Change	% of 2033 Occupations
722000	Food Services and Drinking Places	262,648	14,015	5.64	7.23
611000	Educational Services	255,392	7,553	3.05	7.03
621000	Ambulatory Health Care Services	190,715	22,830	13.6	5.25
561000	Administrative and Support Services	175,115	5,736	3.39	4.82
541000	Professional, Scientific, and Technical Services	170,996	23,333	15.8	4.71
622000	Hospitals	158,601	7,425	4.91	4.37
336000	Transportation Equipment Manufacturing	126,708	-4,643	-3.53	3.49
238000	Specialty Trade Contractors	106,731	4,666	4.57	2.94
930000	Local Government, Excluding Education and Hospitals	100,144	2,001	2.04	2.76
423000	Merchant Wholesalers, Durable Goods	90,418	2,485	2.83	2.49
623000	Nursing and Residential Care Facilities	81,563	4,958	6.47	2.25
813000	Religious, Grantmaking, Civic, Professional, and Similar Organizations	80,980	3,604	4.66	2.23
455000	General Merchandise Retailers	77,384	-1,854	-2.34	2.13
624000	Social Assistance	72,989	8,697	13.53	2.01

493000	Warehousing and Storage	69,956	5,135	7.92	1.93
332000	Fabricated Metal Product Manufacturing	56,879	268	0.47	1.57
484000	Truck Transportation	55,710	779	1.42	1.53
524000	Insurance Carriers and Related Activities	51,500	1,555	3.11	1.42
441000	Motor Vehicle and Parts Dealers	45,457	88	0.19	1.25
445000	Food and Beverage Retailers	42,548	-2,890	-6.36	1.17
0	Total All Industries	3,631,324	135,689	3.88	100

The top projected occupations at the 2-digit SOC in Indiana by 2031, as detailed in Table 8, include transportation and material moving occupations (376,107 jobs); production occupations (366,626 jobs); office and administrative support occupations (361,695 jobs); sales and related occupations (285,665 jobs); and food preparation and serving related occupations (283,240 jobs).

From 2021-2031, all occupation groups at the 2-digit SOC level are projected to experience an increase in jobs, with the exception of office and administrative support occupations (-13,946 jobs) and sales and related occupations (-3,631 jobs) – both of which are among the largest occupation groups in the State. Occupation groups with the largest projected increase in the ten-year period include transportation and material moving occupations (+27,962 jobs); food preparation and serving related occupations (+23,543 jobs); healthcare practitioners and technical occupations (+17,263 jobs); healthcare support occupations (+16,663 jobs); and business and financial operations occupations (+10,662 jobs).

The automation index score is provided via Lightcast which analyzes the potential automation risk of occupations based on job task content, derived from O*NET. Index scores above 100 have an above average risk of automation while occupations with an automation index below 100 have a below average risk of automation.[1] Having a higher-than-average risk of automation means that a relatively high percent of workers' time and tasks will be spent using, managing, and maintaining computerized and/or automated processes and systems. Occupations in Indiana (at the 2-digit SOC level) that are at highest risk of automation include food preparation and serving related occupations (125.4); construction and extraction occupations (123.1); building and grounds cleaning and maintenance occupations (122.5); production occupations (113.6); and transportation and material moving occupations (111.0) – the occupational group with the greatest projected employment in 2031.

[1] Lightcast combines data with the Frey and Osborne findings at the occupation level and identifies which job tasks are 'at risk' and which are resilient. Lightcast incorporates data to identify where occupations cluster in industries facing disruption, and where workers' skills mean their nearest job options are also facing automation risk.

Table 8: Occupations by Employment in Indiana, 2031, 2-digit SOC (source: Quarterly Census of Employment & Wages 2022)

SOC	Occupation	2031 Employment	2021-2031 Change	2021-2031 % Change	Automation Index
53-0000	Transportation and Material Moving	376,107	27,962	8.03%	111.0
51-0000	Production	366,626	1,163	0.32%	113.6
43-0000	Office and Administrative Support	361,695	-13,946	-3.71%	98.3
41-0000	Sales and Related	285,665	-3,631	-1.26%	94.8
35-0000	Food Preparation and Serving Related	283,240	23,543	9.07%	125.4
11-0000	Management	261,109	9,613	3.82%	84.9
29-0000	Healthcare Practitioners and Technical	212,519	17,263	8.84%	88.4
25-0000	Educational Instruction and Library	163,108	10,588	6.94%	85.8
13-0000	Business and Financial Operations	154,265	10,662	7.42%	89.4
49-0000	Installation, Maintenance, and Repair	150,945	7,949	5.56%	108.7
47-0000	Construction and Extraction	146,043	3,279	2.30%	123.1
31-0000	Healthcare Support	130,780	16,663	14.60%	95.0
37-0000	Building and Grounds Cleaning and Maintenance	106,997	5,354	5.27%	122.5
15-0000	Computer and Mathematical	75,501	10,142	15.52%	83.4
39-0000	Personal Care and Service	74,708	8,326	12.54%	96.7
21-0000	Community and Social Service	69,656	6,378	10.08%	82.4
33-0000	Protective Service	60,034	1,341	2.28%	98.9
17-0000	Architecture and Engineering	53,934	3,346	6.61%	87.0
27-0000	Arts, Design, Entertainment, Sports, and Media	47,970	2,716	6.00%	89.8
19-0000	Life, Physical, and Social Science	23,235	1,973	9.28%	84.7
23-0000	Legal	23,077	2,518	12.25%	84.0
45-0000	Farming, Fishing, and Forestry	19,348	865	4.68%	109.9

Table 9 details the top 20 projected occupations by employment in Indiana at the 6-digit SOC level. Top occupations at this level by employment in 2031 include laborers and freight, stock, and material movers, hand (103,717 jobs); fast food and counter workers (93,052 jobs); retail salespersons (81,988 jobs); miscellaneous assemblers and fabricators (80,980 jobs); and registered nurses (70,629 jobs).

Among all subsectors, those that are projected to see the greatest increase in employment between 2021-2031 include home health and personal care aides (+9,523 jobs); laborers and freight, stock, and material movers, hand (+9,285 jobs); cooks, restaurants (+8,816 jobs); fast food and counter workers (+5,047 jobs); and registered nurses (+3,940 jobs). Fast food and counter worker occupations are projected to have the greatest number of annual openings among all subsectors (20,075), followed by laborers and freight, stock, and material movers, hand (14,811 openings). However, the latter is projected to experience the greatest number of exits annually from the workforce (9,816).

Over the ten-year period, DWD also tracks the total number of annual transfers, or the number of estimated workers who leave an occupation to enter a different occupation. Occupations that are projected to have the greatest number of annual transfers from 2021-2031 include fast food and counter workers (9,754 transfers); laborers and freight, stock, and material movers, hand (9,082 transfers); retail salespersons (6,685 transfers); miscellaneous assemblers and fabricators (5,860 transfers); and cashiers (5,697 transfers). With the exception of miscellaneous assemblers and fabricators, each of these occupations require no formal educational credential or work experience. As these workers continue to gain on-the-job experience and upskilling opportunities, they become more qualified for more technical occupations that are associated with higher salaries.

Table 9: Top 20 Occupations by Employment in Indiana, 2031, 6-digit SOC (source: Quarterly Census of Employment & Wages 2022)

SOC	Occupation	2031 Employment	2021-2031 Change	2021 Annual Exits	2021 Annual Transfers	2021 Annual Total Openings
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	103,717	9,285	4,801	9,082	14,811
35-3023	Fast Food and Counter Workers	93,052	5,047	9,816	9,754	20,075
41-2031	Retail Salespersons	81,988	-1,019	5,301	6,685	11,884
51-2090	Miscellaneous Assemblers and Fabricators	80,980	-1,281	3,569	5,860	9,301
29-1141	Registered Nurses	70,629	3,940	2,201	1,705	4,300
43-9061	Office Clerks, General	70,190	-3,203	4,529	4,518	8,727
11-9013	Farmers, Ranchers, and Other Agricultural Managers	69,889	-5,043	5,054	2,566	7,116
53-3032	Heavy and Tractor-Trailer Truck Drivers	59,997	2,357	2,733	4,161	7,130
11-1021	General and Operations Managers	59,530	3,631	1,326	3,676	5,365
41-2011	Cashiers	58,381	-6,331	5,912	5,697	10,976
53-7065	Stockers and Order Fillers	55,482	3,910	3,430	5,688	9,509
37-2011	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	51,256	2,040	3,489	3,526	7,219
43-4051	Customer Service Representatives	50,996	-1,677	2,857	4,427	7,116
31-1120	Home Health and Personal Care Aides	49,316	9,523	3,612	3,120	7,684
35-3031	Waiters and Waitresses	43,388	3,090	3,540	4,943	8,792
49-9071	Maintenance and Repair Workers, General	40,110	1,866	1,607	2,179	3,973
35-2014	Cooks, Restaurant	35,121	8,816	2,120	2,594	5,596
41-4012	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	33,255	1,362	1,119	2,154	3,409
31-1131	Nursing Assistants	32,491	1,218	2,087	2,699	4,908
43-3031	Bookkeeping, Accounting, and Auditing Clerks	29,835	-1,237	2,040	1,707	3,623

Emerging Demand based on Federal Investments

Indiana is expecting unprecedented levels of federal investment in infrastructure, transportation, clean energy, and semiconductor manufacturing from the Infrastructure Investment and Jobs Act, known as the Bipartisan Infrastructure Law (BIL) (including the Broadband Equity Access & Deployment (BEAD) Program), and the Creating Helpful Incentives to Produce Semiconductors (CHIPS) and Science Act, and the Inflation Reduction Act (IRA).

While the exact funding levels and the resulting economic and workforce impact of these investments is still being evaluated, we know that we currently have a high baseline of demand for the workers that will be most critical to deploying these funds across the State even before factoring in the impact of these investments.

Infrastructure Investment and Jobs Act, known as the Bipartisan Infrastructure Law (BIL)

There are currently over 450,000 workers in the industries that are most closely associated with infrastructure projects. The five most critical occupations for deploying infrastructure investments account for 56% of the employment in these industries. The infrastructure sector will need to compete with all other industries across the economy for these workers.

Table 10: Top Occupations Needed for Infrastructure Investments, Baseline Projections, 2022 - 2033 (source: Lightcast)

SOC	Occupation	2022 Jobs	Growth Rate	Prep. Needed	Average Annual Job Openings	Share of Workers Aged 55+	Higher than Average Risk of Automation
47-2061	Construction Laborers	30,769	9%	Some	3,058	17%	✔
47-2073	Operating Engineers and Other Construction Equipment Operators	10,286	8%	Some	1,007	26%	✔
47-1011	First-Line Supervisors of Construction Trades and Extraction Workers	15,532	4%	Medium	1,372	28%	✔
53-3032	Heavy and Tractor-Trailer Truck Drivers	62,728	5%	Some	7,230	35%	✔
11-9021	Construction Managers	9,408	14%	Considerable	832	32%	✗

These occupations account for a significant number of jobs and are projected to grow over the next decade, with the average number of job openings ranging from around 1,000 per year up to over 7,000. Retirement risk is relatively low among these occupations, but automation risk is higher than average. These occupations have minimal education and training requirements, but it is likely that employers would value soft skills and digital literacy training.

Indiana is also poised to receive part of a $1 billion investment, via the BIL, into hydrogen production through the Midwest Alliance for Clean Hydrogen. The Midwest Hub includes Indiana, Illinois, and Michigan and these states could see additional investments from the private sector as well as 13,600 direct jobs. Indiana will produce hydrogen as a fuel source near BP's refinery in Whiting, Indiana. Technical occupations that will be critical to this project include machinists, industrial machinery mechanics, industrial engineers, maintenance and repair workers, general, and industrial production managers.

Inflation Reduction Act (IRA)

There are currently an estimated 684,959 workers employed in clean energy industries across the State. Among the forty-four occupations that are most critical to clean energy, the top five account for 28% of employment.

Table 12: Top Occupations Needed for Clean Energy Investments, Baseline Projections, 2022 - 2033 (source: Lightcast)

SOC	Occupation	2022 Jobs	Growth Rate	Prep. Needed	Average Annual Job Openings	Share of Worker Aged 55+	Higher than Average Risk of Automation
47-2111	Electricians	15,920	10%	Medium	1,669	21%	✓
47-1011	First-Line Supervisors of Construction Trades and Extraction Workers	15,532	4%	Medium	1,372	28%	✓
47-2152	Plumbers, Pipefitters, and Steamfitters	13,306	4%	Medium	1,257	20%	✓
49-9021	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	8,310	8%	Medium	804	19%	✓
49-9051	Electrical Power-Line Installers and Repairers	3,779	13%	Some	375	17%	✓

The top 5 occupations are all experiencing growth, ranging from 4% to 13% over the next decade and are projected to have a significant number of job openings each year due to economic growth and job replacements due to churn and retirement. The clean energy sector will face competition from other sectors for these workers. Each of these occupations have a higher-than-average risk of automation, which means that a relatively high percent of workers' time and tasks will be spent using, managing, and maintaining computerized and/or automated processes and systems. This will likely result in an increased demand for technical and digital skills among these workers. Most of these occupations require a high school diploma or equivalent and short-term training or a registered apprenticeship. However, it is worth noting that although these occupations are at-risk of automation, they will not be going away anytime soon.

iii. Employers' Employment Needs

Table 13 details the educational attainment requirement, work experience requirement, and job training requirements for each of the top 20 projected occupations in Indiana. Most of the top occupations do not require any work experience, except for farmers, ranchers, and other agriculture managers; and general and operations managers both require 5 years of experience or more. The occupational group, cooks, restaurant, requires less than 5 years of experience.

Additionally, nearly all occupations require some level of job training experience, whether that is short-term or moderate-term on-the-job training experience. Only registered nurses; farmers, ranchers, and other agricultural managers; and general and operations managers do not require job training experience. It is worth noting, however, that registered nurses and general and operations managers require additional training post-employment to attain competency in the skills needed in these occupations, which is why there are no job training requirements listed.

Table 13: Educational Attainment Requirement, Work Experience Requirement, and Job Training Requirement for Top 20 Occupations by Employment in Indiana, 2031, 6-digit SOC (source: Quarterly Census of Employment & Wages)

SOC	Occupation	2031 Employment	Education Value	Work Experience Value	Job Training Value
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	103,717	No formal educational credential	None	Short-term on-the-job training
35-3023	Fast Food and Counter Workers	93,052	No formal educational credential	None	Short-term on-the-job training
41-2031	Retail Salespersons	81,988	No formal educational credential	None	Short-term on-the-job training
51-2090	Miscellaneous Assemblers and Fabricators	80,980	High school diploma or equivalent	None	Moderate-term on-the-job training
29-1141	Registered Nurses	70,629	Bachelor's degree	None	None
43-9061	Office Clerks, General	70,190	High school diploma or equivalent	None	Short-term on-the-job training
11-9013	Farmers, Ranchers, and Other Agricultural Managers	69,889	High school diploma or equivalent	5 years or more	None
53-3032	Heavy and Tractor-Trailer Truck Drivers	59,997	Postsecondary non-degree award	None	Short-term on-the-job training
11-1021	General and Operations Managers	59,530	Bachelor's degree	5 years or more	None
41-2011	Cashiers	58,381	No formal educational credential	None	Short-term on-the-job training
53-7065	Stockers and Order Fillers	55,482	High school diploma or equivalent	None	Short-term on-the-job training
37-2011	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	51,256	No formal educational credential	None	Short-term on-the-job training
43-4051	Customer Service Representatives	50,996	High school diploma or equivalent	None	Short-term on-the-job training
31-1120	Home Health and Personal Care Aides	49,316	High school diploma or equivalent	None	Short-term on-the-job training
35-3031	Waiters and Waitresses	43,388	No formal educational credential	None	Short-term on-the-job training
49-9071	Maintenance and Repair Workers, General	40,110	High school diploma or equivalent	None	Moderate-term on-the-job training
35-2014	Cooks, Restaurant	35,121	No formal educational credential	Less than 5 years	Moderate-term on-the-job training
41-4012	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	33,255	High school diploma or equivalent	None	Moderate-term on-the-job training
31-1131	Nursing Assistants	32,491	Postsecondary non-degree award	None	None
43-3031	Bookkeeping, Accounting, and Auditing Clerks	29,835	Some college, no degree	None	Moderate-term on-the-job training

Figure 2 details the educational attainment requirements for all occupations at the 6-digit SOC level in Indiana. Nearly 40% of all occupations in Indiana require a high school diploma or equivalent and 28% require a 2-year or 4-year degree. Only 6% of occupations require a post-secondary non-degree award compared to 1% that require some college, no degree. However, since the data does not include industry-recognized credentials, registered apprenticeships, or other short-term training that is not provided by a registered academic institution, the share of jobs that require technical training is likely undercounted. The percentage of occupations in the State that do not require any formal educational credential (even a high school diploma) is 13%.

Figure 2: Education Attainment Requirement for All Occupations at the 6-digit SOC level (source: Quarterly Census of Employment & Wages)
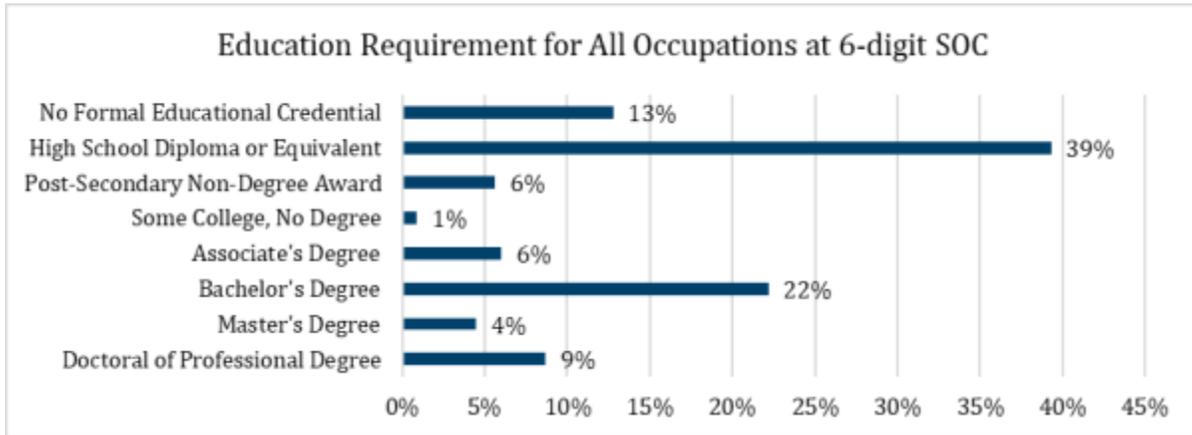
Indiana collected job posting analytics data provided by Lightcast's dataset of job posting profiles by employers.[1] Tables 14, 15, and 16 detail the top advertised specialized skills, commons skills, and qualifications for the top five industry sectors in Indiana at the 2-digit NAICS level in 2031. The skills and qualifications listed are associated with a percentage. This reflects the percent of job postings, collected, gleaned, and documented by Lightcast, that have those skills and qualifications listed for each respective industry sector (Tables 14, 15, and 16) and occupations (Tables 17, 18, and 19) from January 2021 to January 2023.

[1] Data Methodology: https://kb.lightcast.io/en/articles/6957446-job-posting-analytics-jpa-methodology

Table 14: Top Advertised Specialized Skills for Top 5 Industry Sectors in Indiana, 2031 (source: Lightcast)[1]

NAICS	Sector	Specialized Skills
31	Manufacturing	• Project Management (10%) • Auditing (9%) • Forklift Truck (9%) • Warehousing (9%) • Good Manufacturing Practices (7%)
62	Health Care and Social Assistance	• Nursing (26%) • Nursing Care (7%) • Medical Records (6%) • CPR (6%) • Caregiving (5%)
44	Retail Trade	• Merchandising (39%) • Selling Techniques (15%) • Cash Register (14%) • Product Knowledge (10%) • Inventory Management (9%)
72	Accommodation and Food Services	• Restaurant Operation (43%) • Food Safety and Sanitation (13%) • Cash Handling (8%) • Food Preparation (8%) • Food Services (8%)
61	Educational Services	• Marketing (8%) • Student Services (6%) • Nursing (6%) • Lesson Planning (6%) • Project Management (5%)

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[1] Source: Lightcast 2023.3, Job Posting Analytics, January 2021 – January 2023

Table 15: Top Advertised Common Skills for Top 5 Industry Sectors in Indiana, 2031 (source: Lightcast)[1]

NAICS	Sector	Common Skills
31	Manufacturing	• Communications (39%) • Management (27%) • Operations (23%) • Leadership (21%) • Problem Solving (20%)
62	Health Care and Social Assistance	• Communications (29%) • Customer Service (16%) • Management (13%) • Leadership (11%) • Planning (9%)
44	Retail Trade	• Customer Service (59%) • Sales (48%) • Communications (39%) • Management (32%) • Leadership (21%)
72	Accommodation and Food Services	• Customer Service (37%) • Communications (31%) • Management (24%) • Cleanliness (17%) • Operations (16%)
61	Educational Services	• Communications (40%) • Teaching (27%) • Management (18%) • Leadership (18%) • Writing (17%)

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1 Source: Lightcast 2023.3, Job Posting Analytics, January 2021 – January 2023

Table 16: Top Advertised Qualifications for Top 5 Industry Sectors in Indiana, 2031 (source: Lightcast)[1]

NAICS	Sector	Common Skills
31	Manufacturing	• Valid Driver's License • Security Clearance • Master Of Business Administration (MBA) • Forklift Certification • Commercial Driver's License (CDL)
62	Health Care and Social Assistance	• Registered Nurse (RN) • Basic Life Support (BLS) Certification • Valid Driver's License • CPR Certification • Licensed Practical Nurse (LPN)
44	Retail Trade	• Valid Driver's License • Certified Pharmacy Technician • Registered Pharmacist (RPh) • Automotive Service Excellence (ASE) Certification • CDL Class A License
72	Accommodation and Food Services	• Valid Driver's License • ServSafe Certification • Food Safety Certification • Food Handler's Card • CPR Certification
61	Educational Services	• Valid Driver's License • Teaching Certificate • Registered Nurse (RN) • CPR Certification • Board Certified/Board Eligible

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1 Source: Lightcast 2023.3, Job Posting Analytics, January 2021 – January 2023

Drilling deeper, Tables 17, 18, and 19 detail the top advertised specialized skills, common skills, and qualifications for the top five occupations in Indiana at the 6-digit SOC level in 2031.

Table 17: Top Advertised Specialized Skills for Top 5 Emerging Occupations in Indiana, 2031 (source: Lightcast)[1]

SOC	Occupation	Specialized Skills
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	• Warehousing (66%) • Forklift Truck (27%) • Palletizing (17%) • Pallet Jacks (13%) • General Mathematics (9%)
35-3023	Fast Food and Counter Workers	• Restaurant Operation (38%) • Food Services (24%) • Food Safety & Sanitation (22%) • Cash Register (13%) • Food Preparation (13%)
41-2031	Retail Salespersons	• Merchandising (48%) • Selling Techniques (26%) • Cash Register (18%) • Cash Handling (14%) • Stocking Merchandise (13%)
51-2090	Miscellaneous Assemblers and Fabricators	• Hand Tools (24%) • Assembly Lines (16%) • Power Tool Operation (13%) • Machinery (8%) • Warehousing (7%)
29-1141	Registered Nurses	• Nursing (52%) • Nursing Care (17%) • Intensive Care Unit (11%) • Medication Administration (9%) • Home Health Care (8%)

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[1] Source: Lightcast 2023.3, Job Posting Analytics, January 2021 – January 2023

Table 18: Top Advertised Common Skills for Top 5 Emerging Occupations in Indiana, 2031 (source: Lightcast)1

SOC	Occupation	Common Skills
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	• Loading & Unloading (29%) • Lifting Ability (29%) • Communications (19%) • Detail Oriented (13%) • Packaging & Labeling (13%)
35-3023	Fast Food and Counter Workers	• Customer Service (44%) • Communication (26%) • Sanitation (21%) • Cleanliness (15%) • Management (14%)
41-2031	Retail Salespersons	• Sales (78%) • Customer Service (72%) • Communications (38%) • Retail Sales (28%) • Management (25%)
51-2090	Miscellaneous Assemblers and Fabricators	• Lifting Ability (23%) • Detail Oriented (16%) • Communications (15%) • Operations (12%) • Packaging And Labeling (9%)
29-1141	Registered Nurses	• Communications (18%) • Planning (10%) • Management (9%) • Coordinating (8%) • Teaching (8%)

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1 Source: Lightcast 2023.3, Job Posting Analytics, January 2021 – January 2023

Table 19: Top Advertised Qualifications for Top 5 Emerging Occupations in Indiana, 2031 (source: Lightcast)[1]

SOC	Occupation	Common Skills
53-7062	Laborers and Freight, Stock, and Material Movers, Hand	• Valid Driver's License • Forklift Certification • Commercial Driver's License • Security Clearance • CDL Class A License
35-3023	Fast Food and Counter Workers	• Valid Driver's License • Food Handler's Card • ServSafe Certification • Food Safety Certification • CPR Certification
41-2031	Retail Salespersons	• Valid Driver's License • Automotive Service Excellence (ASE) Certification • Cosmetology License • Esthetician License • Registered Nurse (RN)
51-2090	Miscellaneous Assemblers and Fabricators	• Valid Driver's License • Security Clearance • Forklift Certification • Linux Certified Instructor • Commercial Driver's License (CDL)
29-1141	Registered Nurses	• Registered Nurse (RN) • Basic Life Support (BLS) Certification • Advanced Cardiovascular Life Support (ACLS) Certification • CPR Certification • Advanced Life Support

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[1] Source: Lightcast 2023.3, Job Posting Analytics, January 2021 – January 2023

B. _Workforce Analysis_: _The Unified or Combined State Plan must include an analysis of the current workforce in the State and within various state regions, including for populations with barriers to employment described in the first paragraph of Section II. Analysis must include-_

i. _Employment and Unemployment_: _Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State._

ii. _Labor Market Trends_: _Provide an analysis of key labor market trends, including across existing industries and occupations._

iii. _Education and Skill Levels of the Workforce_: _Provide an analysis of the educational and skill levels of the workforce._

iv. _Comparison of Economic and Workforce Analytical Conclusion_: _Describe areas of opportunity for meeting hiring, education, and skills needs identified in the economy compared to the assets available in the labor force in the state._

  i.   **_Employment and Unemployment_:** _Provide an analysis of current employment and unemployment data, including labor force participation rates, and trends in the State._

Labor Force size in Indiana has continually increased over the last ten years, with the exception of 2020 amid the height of the global COVID-19 pandemic. The average annual employment size in Indiana in 20254 was 3,489,204.

Figure 3: Average Annual Employment Size in Indiana, 2020 - 2025 (source: Bureau of Labor Statistics)
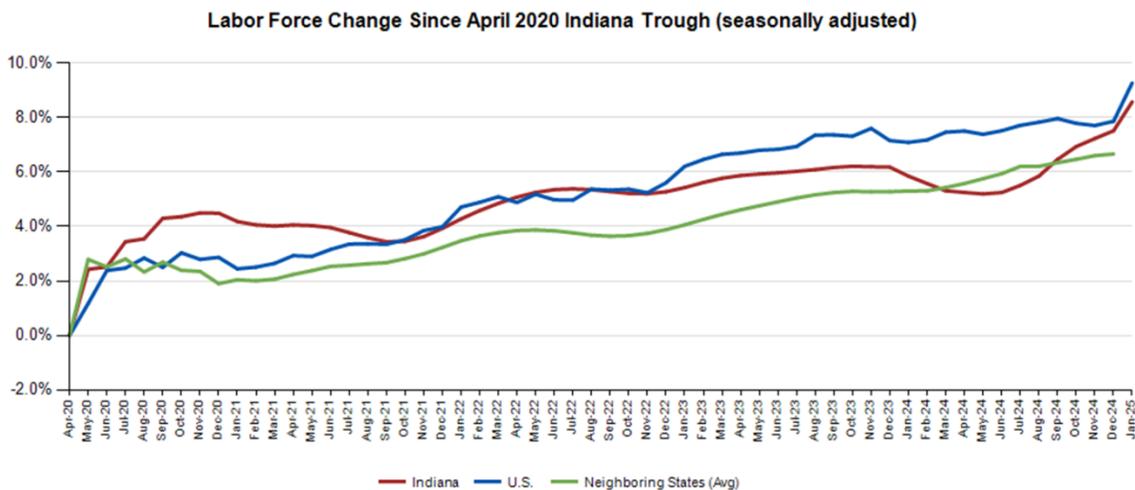
The employment-population ratio represents the number of employed people as a percentage of the civilian non-institutional population. In other words, the percentage of the population that is currently working is calculated as: (Employed ÷ Civilian Noninstitutional Population) x 100. From 2012 to 2018, the employment-population ratio steadily increased, demonstrating an increase in employment by the State's population. Since the Pandemic, the total Labor Force has resumed growing and the employment to population ratio has stabilized. Indiana is tracking at or near the U.S. and above neighboring states in Labor Force growth.

Figure 4: Employment-Population Ratio in Indiana, 2015 – June 2025 (source: Bureau of Labor Statistics)

Employment to Population Ratio
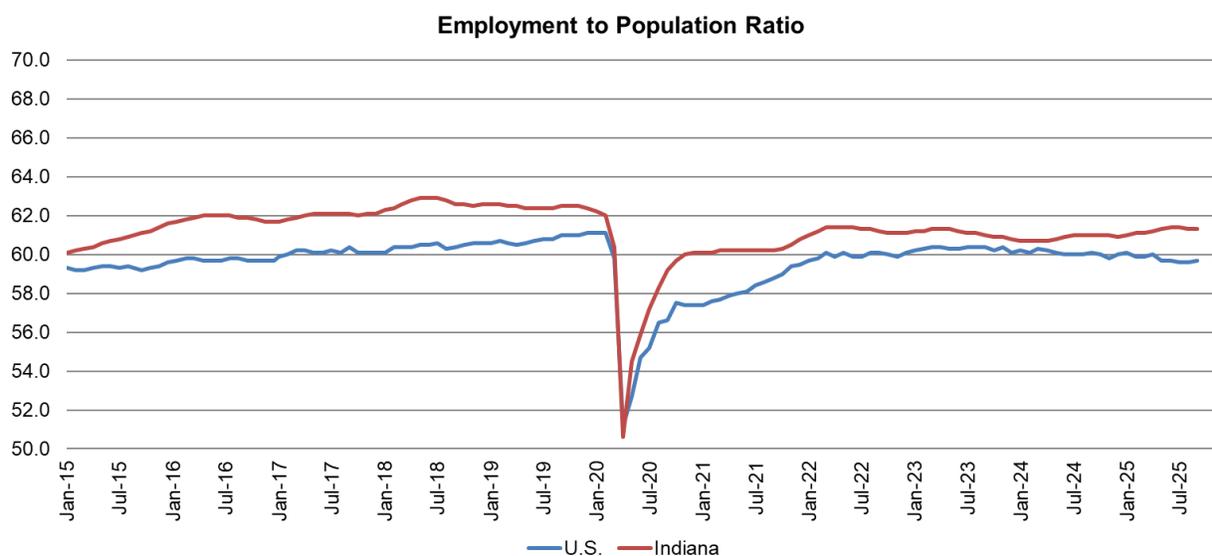
The average annual unemployment rate in Indiana has followed national trends. Since the pandemic Indiana's unemployment rate has typically run below the U.S. and neighboring border states. Indiana's rate briefly was higher than the U.S. in late 2024 but currently is below the U.S. rate.

Figure 5: State & National Unemployment Rate, 2021 - 2025 (source: Bureau of Labor Statistics)

Unemployment Rate 2021 - 2025 (seasonally adjusted)
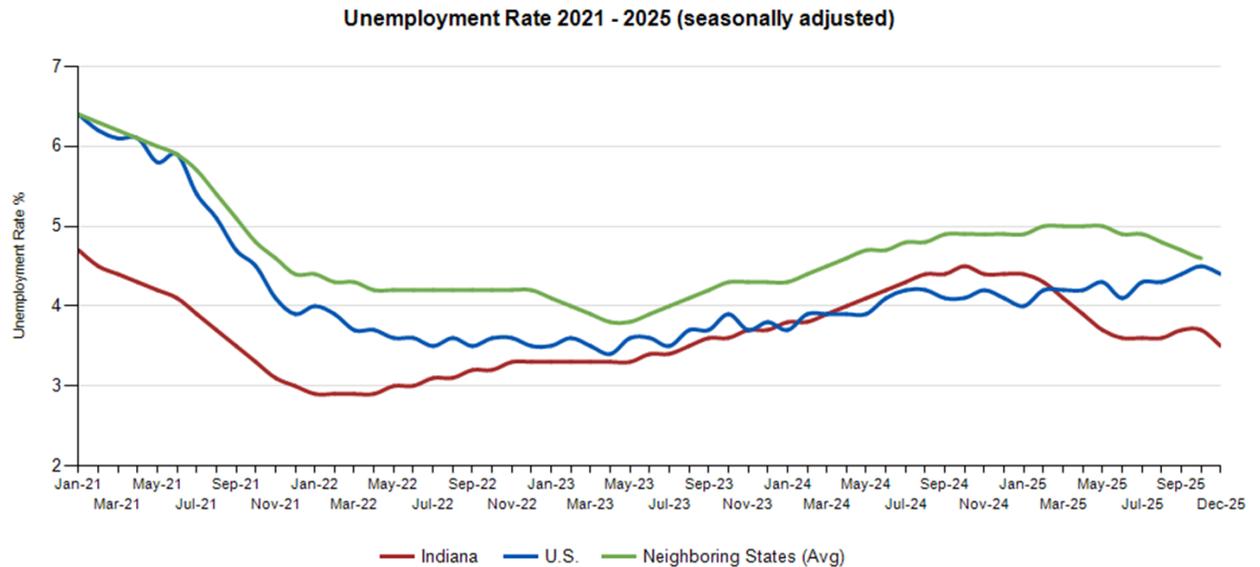
As depicted in Table 20, the lowest annual unemployment rate in 2024 was in Indiana Economic Growth Region (EGR) 11 at 3.8% which encompasses Dubois, Gibson, Knox, Perry, Pike, Posey, Spencer, Vanderburgh, and Warrick counties. The highest annual unemployment rate was in EGR 1 (5.2%) which encompasses the northwestern counties of Jasper, Lake, LaPorte, Newton, Porter, Pulaski, and Starke. For a full map of the EGRs, please see https://www.in.gov/dwd/about-dwd/regional-maps/.

Table 20: Regional Labor Force by Indiana Economic Growth Regions 2024 (States Indiana)				
Geography	Labor Force	Employment	Unemployment	Unemployment Rate
Economic Growth Region 1	418,902	397,014	21,888	5.2
Economic Growth Region 2	300,842	286,430	14,412	4.8
Economic Growth Region 3	392,888	377,083	15,805	4
Economic Growth Region 4	256,472	245,332	11,140	4.3
Economic Growth Region 5	613,052	591,452	21,600	3.5

Economic Growth Region 6	155,367	148,547	6,820	4.4
Economic Growth Region 7	101,571	97,163	4,408	4.3
Economic Growth Region 8	160,613	154,273	6,340	3.9
Economic Growth Region 9	167,095	160,586	6,509	3.9
Economic Growth Region 10	159,252	153,064	6,188	3.9
Economic Growth Region 11	217,017	208,715	8,302	3.8
Economic Growth Region 12 (Marion Co)	512,930	491,338	21,592	4.2

From 2001 to 2009, Indiana's labor force participation rate was higher than the national labor force participation rate, however 2009's Great Recession impacted the State's labor force greater than the nation. In 2013, Indiana mirrored national labor force participation rates and it has had a higher labor force participation rate than the nation ever since. Even during the COVID-19 pandemic, Indiana's labor force participation rate remained more resilient than the nation's labor force participation rate. In 2025, Indiana's labor force participation rate was 63.6% compared to the national rate of 62.5% - a difference of 1.2 percentage points.

Figure 6: Labor Force Participation Rate, 2001-2025, Indiana & U.S. (source: Bureau of Labor Statistics)
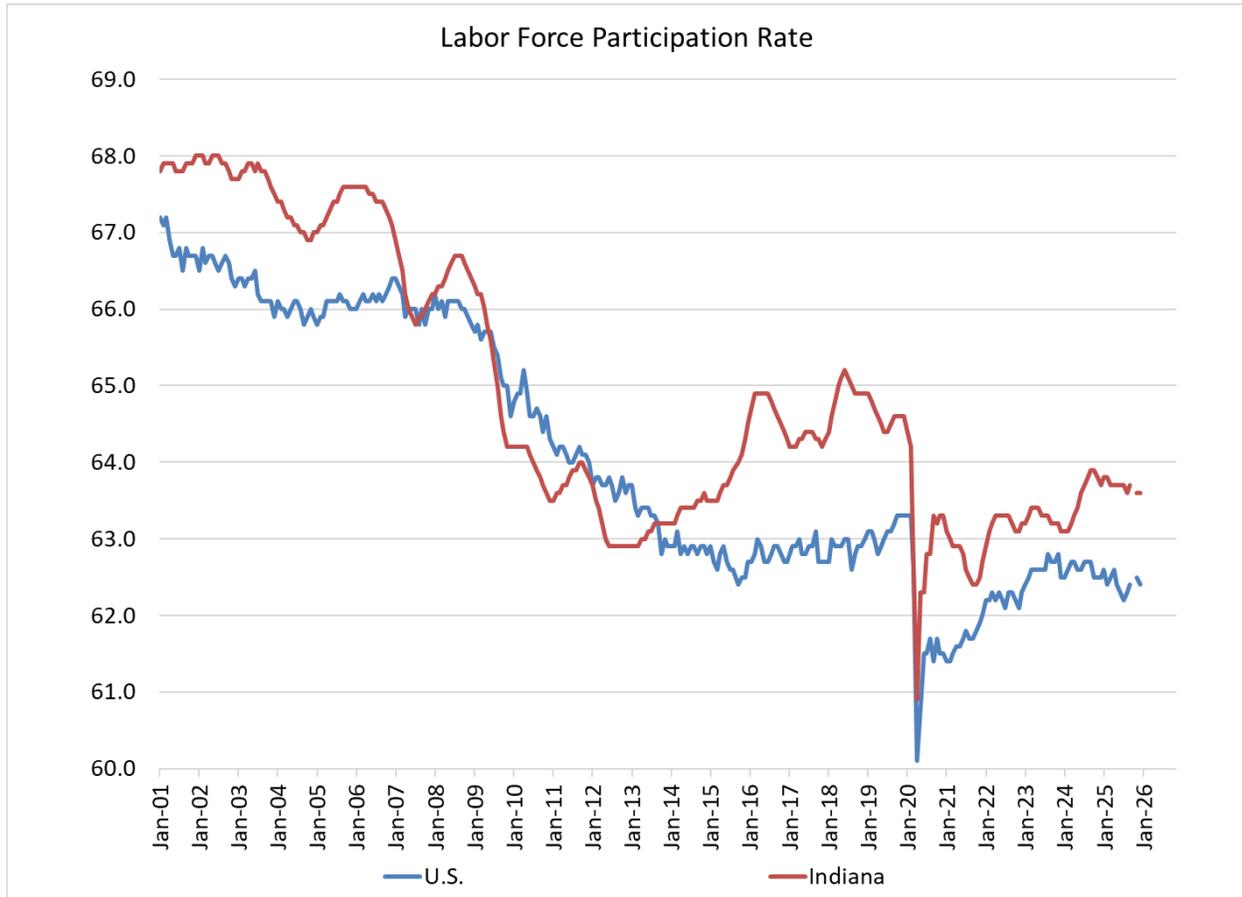
Ensuring opportunities for populations with barriers to employment is critical to ensuring Indiana has a strong labor market and economic opportunities for all. The next section focuses on identifying demographics that are more likely to be unemployed or to have dropped out of the labor force.

Table 21 shows labor force demographics by sex and race/ethnicity. In 2024, 65.2% of civilian non-institutionalized men were in the labor force, compared to 55.2% of civilian non-institutionalized women.[1] Employment within a population group by race/ethnicity is highest among Hispanic or Latino men (75.5%), followed by White men (67.9%). Employment by race/ethnicity group is lowest among White women (56.7%) Unemployment is lowest among White men (3.7%) and White women (3.5%). Asians as an overall group have an unemployment rate of 3.5%. [1] Source: U.S. Bureau of Labor Statistics, Current Population Survey, 2024

	Percent of Population Group in the Labor Force 2024	2024 Employment to Population	2024 Unemployment Rate
White	62.2	60.0	3.6
White, men	67.9	65.4	3.7
White, women	56.7	54.7	3.5
Black or African American	63.0	59.2	6.0
Black or African American, men	65.9	61.7	6.4
Black or African American, women	60.5	57.1	5.6
Asian	65.0	62.7	3.5
American Indian and Alaska Native	61.1	57.1	6.5
Hispanic or Latino ethnicity	67.2	63.8	5.1
Hispanic or Latino ethnicity, men	75.5	71.9	4.8
Hispanic or Latino ethnicity, women	58.9	55.8	5.4

Using a different dataset, the U.S. Census' American Community Survey allows for another cut of employment statistics by demographic, including populations more likely to face barriers to participating in the labor force. Overall, the labor market is tight, with the vast majority of working aged adults already participating in the labor force. There are pockets of workers in the labor force, including among disadvantaged and underserved populations, that would benefit from targeted programs to remove barriers and provide opportunities to work, including teens and young adults, individuals who have not earned a high school diploma or equivalent, individuals below the poverty line, and individuals with disabilities. Note this data cannot be cross-tabulated as the population included varies (e.g., full population 16 + or just the population aged 25 – 64) and individuals may fall into multiple categories (i.e., an individual who is not participating in the labor force may identify as male, two or more races, and below the poverty line, with no one of those identities explaining why that person is not employed).

Figure 7 shows Indiana's employment by age for the civilian labor force population over the age of 16. The overall Labor Force Participation rate is 64.2%36% of the population 16 years and older not participating in the labor force, but it varies widely by age. Overall, unemployment is low but tends to be highest among young adults. Among the prime working age population (25 to 54), 84% are employed, 4.3% are unemployed, and 16% are not participating in the labor force. This relatively low share of adults not participating in the labor force are likely not participating by choice (e.g. stay at home parents) or have high barriers preventing them from participating. Over half of teens and nearly a quarter of young adults under the age of 25 do not participate in the labor force, reflecting long-term national trends prioritizing education and college. Only 39% of seniors and those likely to retire in the next ten years (55 years and older) are currently employed, and the 61% who are not participating in the labor force are likely doing so due to retirement.

Figure 7: Employment by Age, Civilian Population Aged 16+, 2023 (source: US Census, American Community Survey)

Indiana Labor Force Distribution by Age Group
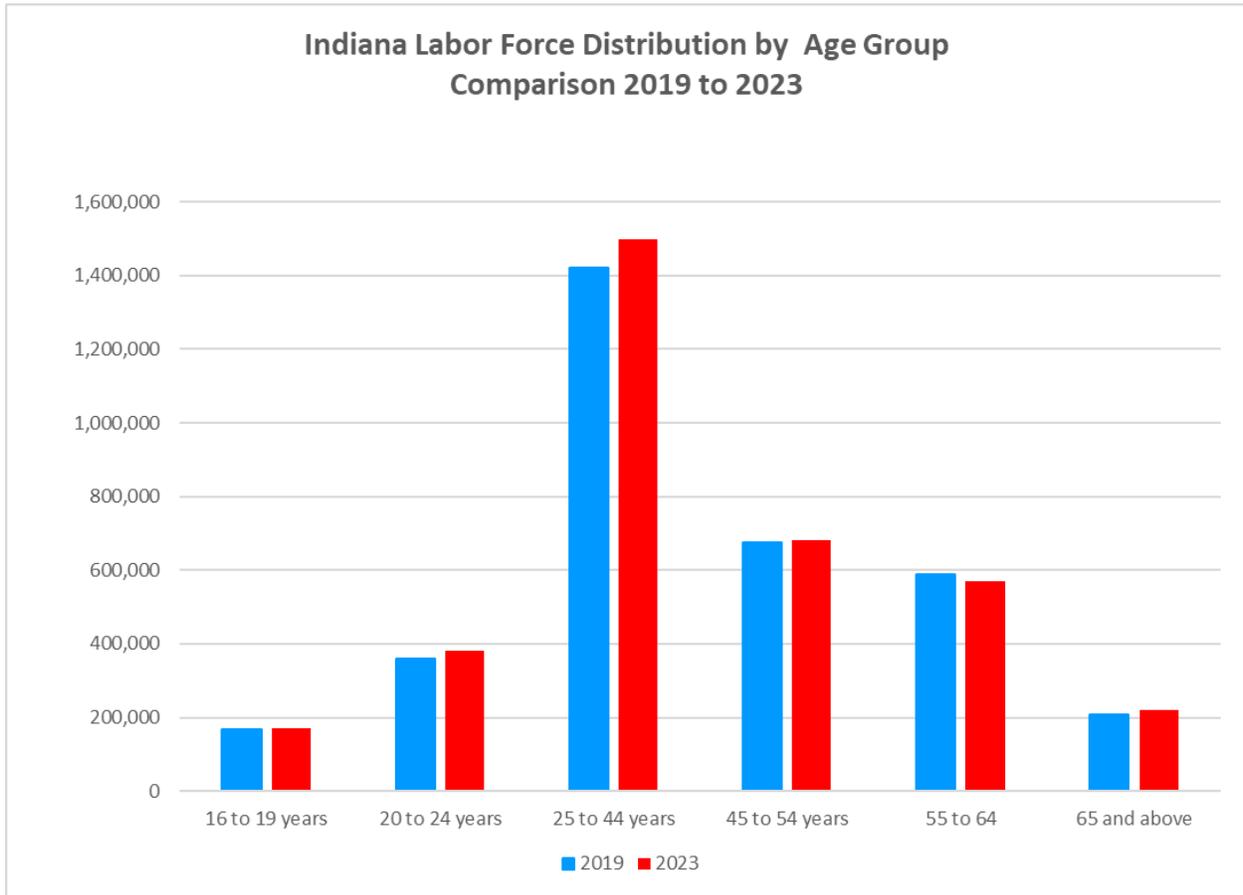Comparison 2019 to 2023

Figure 8: Employment by Race, Civilian Population Age 16+, 2022 (source: US Census, American Community Survey, S2301, 1-year estimates)

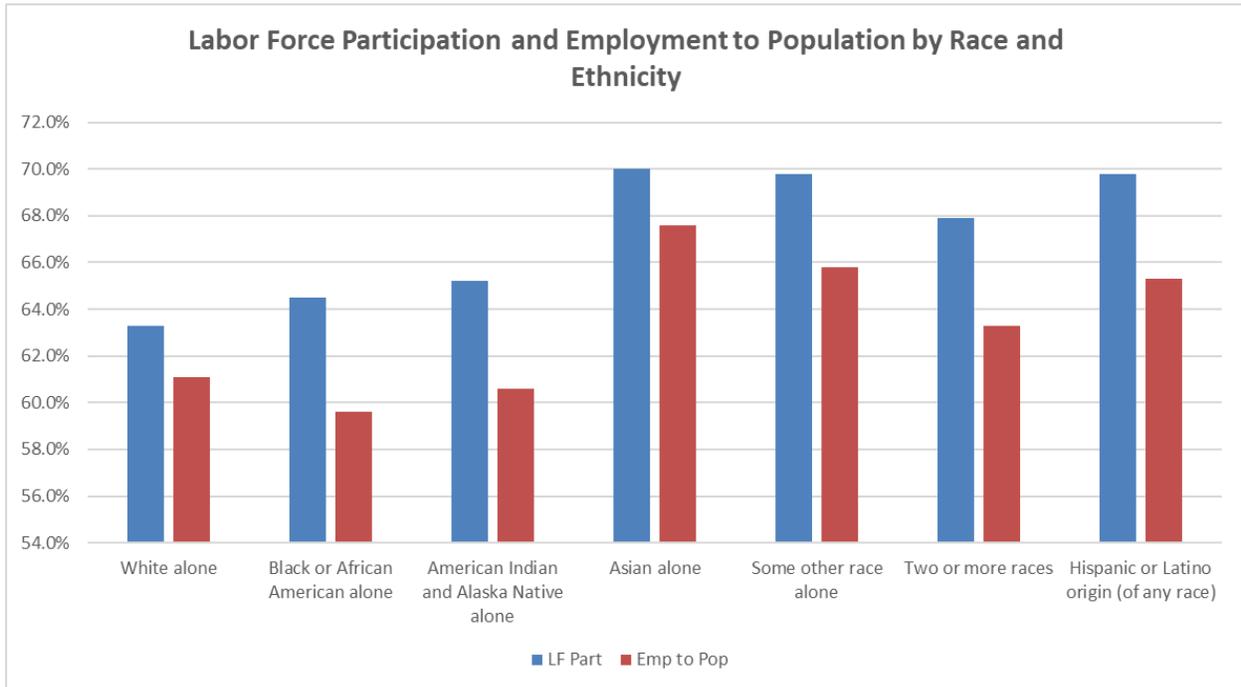Figure 8 shows Indiana's employment by race for the civilian population over the age of 16. The vast majority of the population and workforce in Indiana identifies as White alone has a 63.3% Labor Market participation rate.   Asian, Hispanic and "Some other race alone all of Labor Force Participation rates at or slightly below 70%.

Employment statistics by educational attainment for the civilian population between the ages of 25 and 64 are shown in Figure 9. Overall, 77% of the population aged 25 – 64 are employed, 2% are unemployed, and 20% are not participating in the labor force. About 10% of this population have less than a high school diploma, while 29% have earned a high school diploma or equivalent. Another 29% have completed some college or two-year degree, and 32% have a four-year degree or higher. Labor force participation increases, and unemployment decreases as educational levels rise. Nearly half of individuals that did not graduate high school are either unemployed or not participating in the workforce.

Figure 9: In Labor Force by Educational Attainment, Civilian Population Aged 25-64, 2022 (source: U.S. Census, American Community Survey, S2301, 1-year estimates)
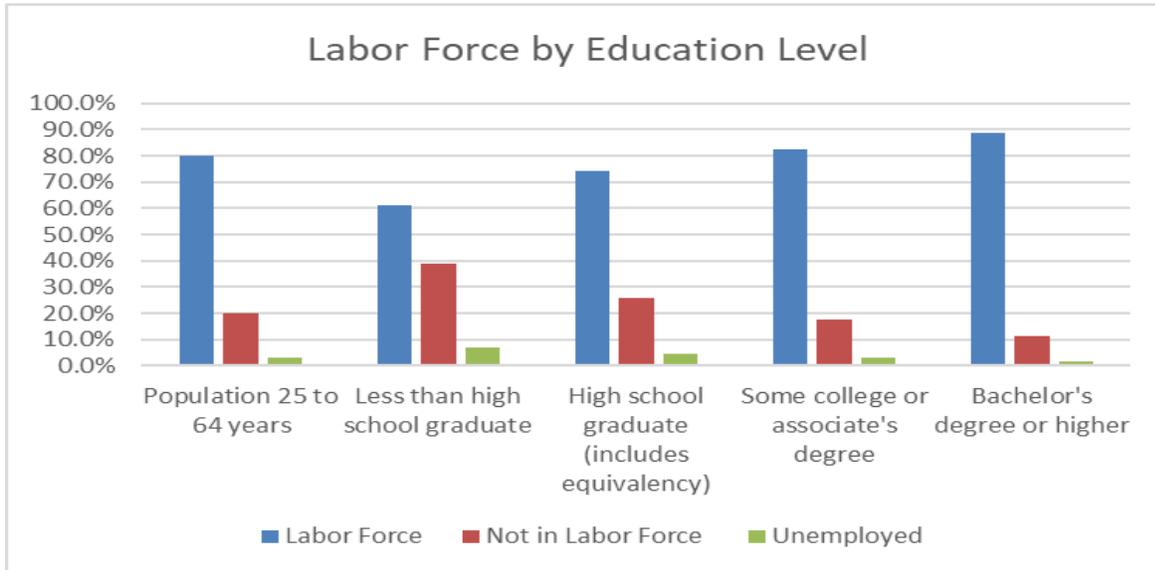
Employment by sex is shown in Figure 10 for the population between the ages of 20 and 64. While males and females each account for 50% of the population in this age range, males account for a slightly larger share of the employed (52%). Women have slightly lower unemployment, but they participate in the labor force by 6 percentage points less than men.

Figure 10: Employment by Sex, Civilian Population Aged 20-65, 2022 (source: U.S. Census, American Community Survey, S2301, 1-year estimates)
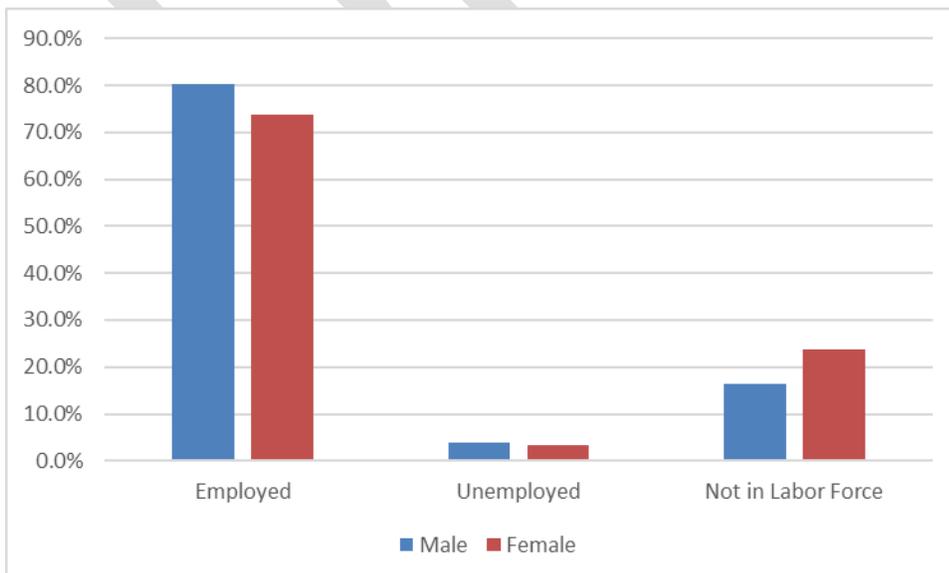
Figure 11: Employment by Other Demographics, Civilian Population Aged 20-65, 2022 (source: U.S. Census, American Community Survey, S2301, 1-year estimates)
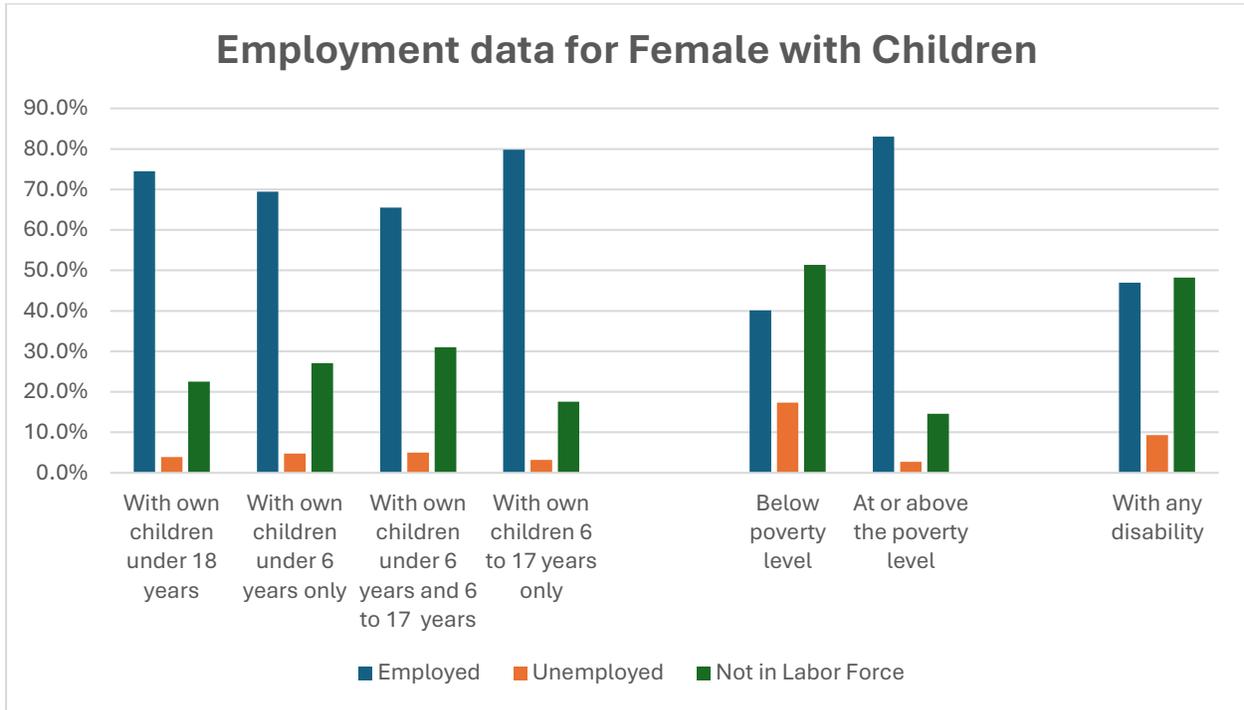
Figure 11 shows employment statistics by parental, poverty, and disability status for the population aged 20 to 65. Females living with their own children account for about 26% of the female population, and counter to conventional thinking about females in the workforce, they are more likely to be participating in the labor force than the broader population of females (17% are not in the labor force compared to 22% for females overall as shown in Figure 11 and compared to 20% for the overall population aged 20-65). However, having younger children under the age of 6 does appear to impact labor force participation among females compared to having older children, although this group accounts for a relatively small number of people. Individuals below the poverty line have the highest unemployment rates of any demographic at 16%. They also have one of the highest rates of not participating in the labor force at 52%. Half of individuals with any type of disability do not participate in the labor force, likely in part due to the risk of losing disability benefits.

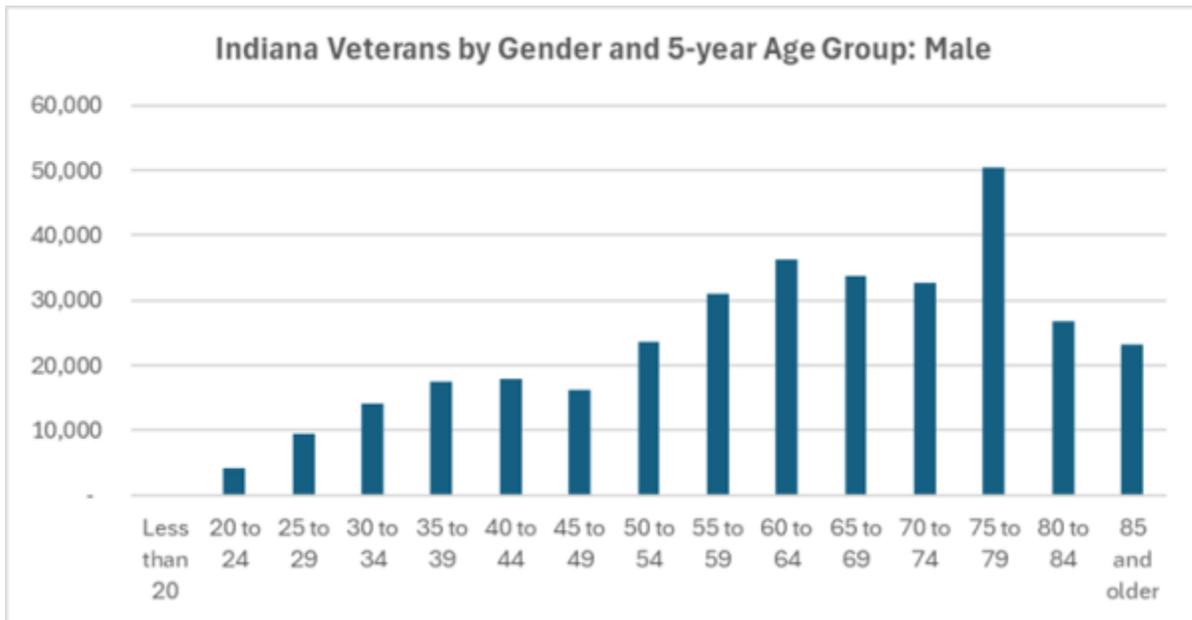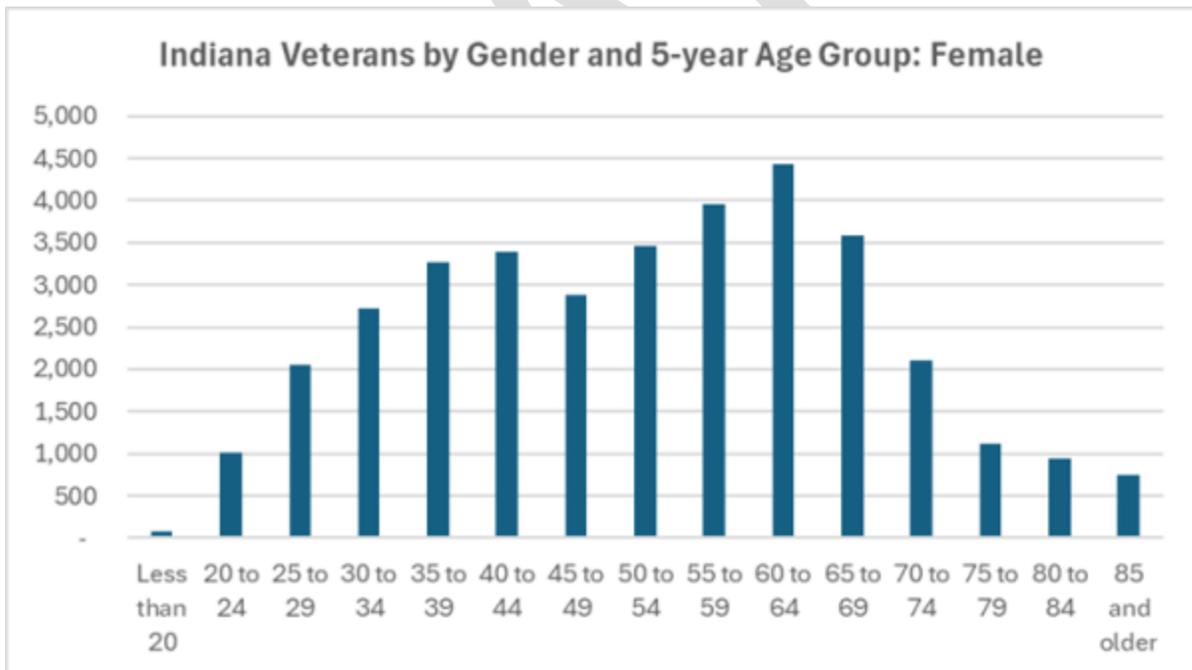**Figure 12: Indiana Veterans by Gender and Age, Male**

Figure 13: Indiana Veterans by Gender and Age, Female

Source: US Department of Veterans Affairs, Living Veterans Projections by State, 2024

In 2024, 372,484 Veterans are estimated as living in Indiana, which is 7% of the state's adult resident population. 2.9% was the annual average unemployment rate for Veterans in 2023. Female Veterans make up 10% of total Veterans. Male Veterans aged 60+ make up 55% of the total Veteran population in Indiana.

ii. _Labor Market Trends:_ *Provide an analysis of key labor market trends, including across existing industries and occupations.*

The workforce demographics of Indiana's labor market have changed from 2000 to 2024. The greatest percentage increase of any population cohort was concentrated in Asian populations (+347.3%), followed by two or more race populations (+306.7%), and Hispanic or Latino populations (+290.3%). While Indiana's population has become more diverse over the past two decades, white populations continue to represent the greatest share with 76.1%.

Indiana Populaton by race 2023

- White alone
- Black or African American alone
- American Indian and Alaska Native alone
- Asian alone
- Some other race alone

3.4% — 2.5% — 0.4% — 0.1% — 2.8% — 9.1% — 76.1%
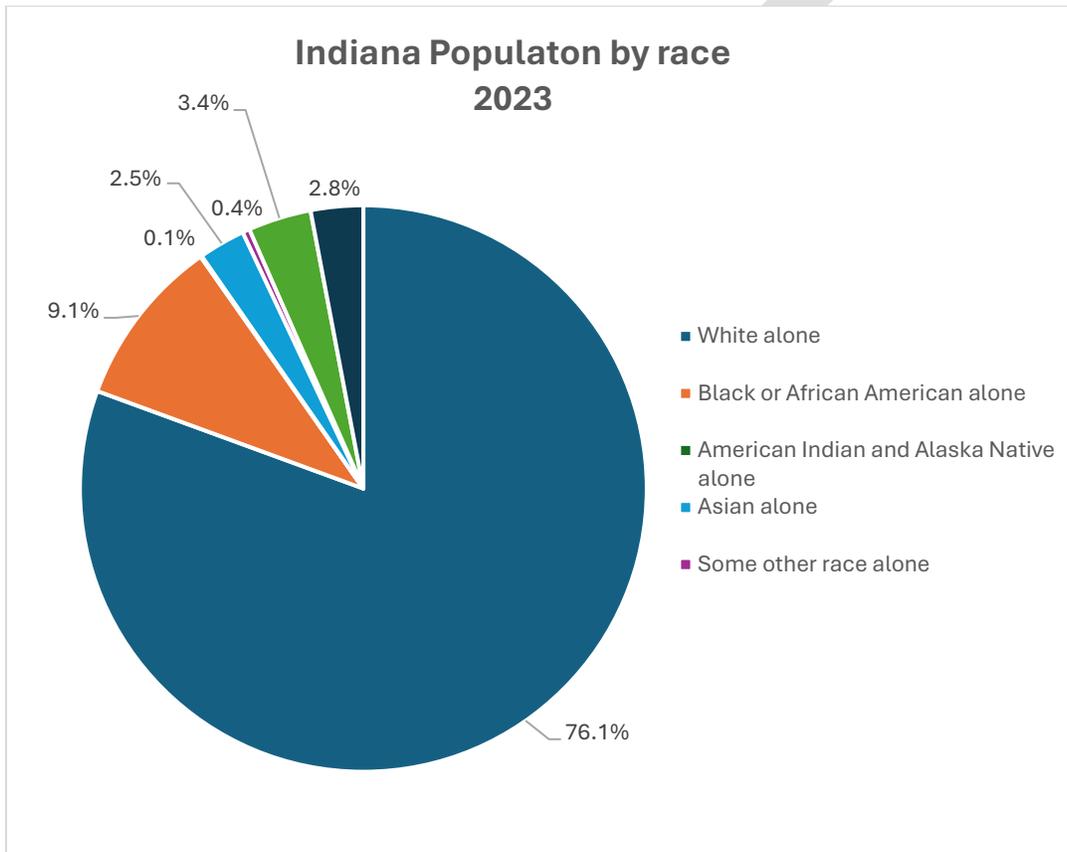
Table 23 details the population share by age statewide and nationally in 2002 and 2022, respectively. Indiana's population by age composition closely mirrors that of the nation. According to U.S. Census Bureau's American Community Survey 1-Year Estimates, individuals between the ages of 55-64 represent nearly 17% of the State's total population in 2022.[1] As this population cohort prepares to exit the workforce in the next five years (due to retirement), it will be critical to ensure a pipeline of talent is generated to backfill the workforce demand by employers.

[1] Source: U.S. Census Bureau, American Community Survey, Table S0101, 2022

Table 23: Population Shar by Age (Source U.S. Census Bureau)

	2024		2005	
	Indiana	USA	Indiana	USA
0-4	5.9%	5.5%	6.8%	6.7%
5 to 17	17.0%	16.0%	18.5%	18.1%
18-24	9.7%	9.2%	10.2%	10.0%
25-44	25.9%	27.0%	27.3%	28.0%
45-64	23.9%	24.2%	24.8%	24.7%
65 and older	17.5%	18.0%	12.4%	12.4%

Table 24 shows Agriculture, Forestry, Fishing and Hunting employs the largest share of workers over the age of 55 (29%), followed by the Other Services (28%); and Wholesale Trade (27%). For individuals between the ages of 25-34 (i.e., recently graduated from post-secondary education and/or been engaged in the workforce post high school), the top sectors for employment include Professional, Scientific, and Technical Services (25%) and Administrative and Support and Waste Management and Remediation Services (24%).

Table 24: Workforce Demographics by Age, 2- Digit Industry (NAICS) 2025 (Source Lightcast)

NAICS	Job Title	2025 Jobs	14-18	19-24	19-21	22-24	25-34	35-44	45.54	55-64	65+
31	Manufacturing	523,418	1%	8%	3%	5%	21%	22%	23%	20%	6%
62	Health Care and Social Assistance	461,256	1%	10%	4%	6%	22%	22%	21%	16%	7%
90	Government	447,636	1%	10%	5%	5%	21%	22%	23%	16%	7%
44	Retail Trade	313,710	7%	18%	10%	8%	20%	17%	15%	14%	9%
72	Accommodation and Food Services	272,832	18%	22%	13%	9%	19%	15%	11%	8%	6%
23	Construction	176,058	2%	12%	6%	6%	23%	22%	21%	15%	6%
48	Transportation and Warehousing	175,649	1%	12%	5%	7%	23%	22%	20%	16%	6%
56	Administrative and Support and Waste Management and Remediatio	170,372	1%	12%	5%	7%	24%	22%	18%	14%	8%
54	Professional, Scientific, and Technical Services	150,909	1%	8%	2%	5%	25%	24%	20%	16%	7%
81	Other Services (except Public Administration)	150,548	4%	13%	7%	6%	18%	19%	18%	17%	11%
42	Wholesale Trade	136,117	1%	7%	3%	4%	20%	23%	23%	20%	7%
52	Finance and Insurance	114,002	0%	6%	2%	4%	20%	24%	23%	20%	6%
61	Educational Services	77,225	3%	13%	8%	6%	19%	21%	19%	16%	9%
71	Arts, Entertainment, and Recreation	42,642	13%	16%	8%	8%	21%	15%	14%	12%	10%
53	Real Estate and Rental and Leasing	38,496	1%	8%	3%	5%	20%	21%	22%	18%	9%
55	Management of Companies and Enterprises	35,652	2%	8%	3%	5%	21%	23%	22%	18%	5%
51	Information	26,625	3%	8%	3%	5%	21%	23%	22%	17%	5%
11	Agriculture, Forestry, Fishing and Hunting	18,962	4%	9%	4%	5%	20%	20%	17%	16%	13%
22	Utilities	13,320	0%	4%	1%	3%	19%	27%	26%	20%	5%
21	Mining, Quarrying, and Oil and Gas Extraction	5,027	0%	7%	3%	4%	22%	22%	23%	19%	6%

Table 25 details the top 20 occupations by employment in Indiana and the age cohorts that make up each occupational group at the 5-digit SOC level. The percentage share depicts how each population cohort stacks up among the top 20 occupations.

Among the top 20 occupations, retirement risk (a large share of the workforce above the age of 55) is highest among Bookkeeping, Accounting and Auditing Clerks (40%), Secretaries and Administrative Assistants (35%), Heavy and Tractor-Trailer Truck Drivers (33%), and Retail Salespersons (26%). In comparison, prime working age individuals (between the ages of 25-54) are largely concentrated in General and Operations Managers (74%), Registered Nurses (70%), and Miscellaneous Assemblers and Fabricators (66%).

Table 25: Workforce Demographis of Top 20 Occupations by Employment in Indiana, 2025, 6 digit SOC (Source Lighcast)

SOC	Job Title	2025 Jobs	14-18	19-24	25-34	35-44	45-54	55-64	65+
35-302	Fast Food and Counter Workers	100,666	28%	28%	16%	10%	8%	6%	4%
51-209	Miscellaneous Assemblers and Fabricators	95,595	1%	11%	23%	22%	21%	17%	5%
53-706	Laborers and Freight, Stock, and Material Movers, Hand	95,113	3%	18%	25%	19%	16%	13%	5%
41-203	Retail Salespersons	81,061	7%	21%	18%	13%	13%	14%	12%
29-114	Registered Nurses	70,589	0%	6%	23%	24%	23%	19%	6%
43-906	Office Clerks, General	70,163	3%	14%	17%	17%	19%	19%	11%
41-201	Cashiers	66,400	15%	24%	17%	13%	12%	11%	8%
31-112	Home Health and Personal Care Aides	61,935	1%	11%	19%	19%	20%	18%	11%
53-706	Stockers and Order Fillers	61,888	6%	21%	21%	17%	15%	13%	7%
53-303	Heavy and Tractor-Trailer Truck Drivers	57,711	0%	5%	17%	21%	24%	23%	10%
37-201	Janitors and Cleaners, Except Maids and Housekeeping Cleaners	50,407	3%	10%	16%	19%	22%	20%	11%
11-102	General and Operations Managers	50,135	0%	2%	18%	29%	27%	19%	6%
43-405	Customer Service Representatives	48,125	2%	13%	25%	20%	18%	15%	6%
35-303	Waiters and Waitresses	43,054	17%	31%	22%	13%	8%	5%	3%
25-109	Postsecondary Teachers	40,191	0%	10%	20%	18%	22%	16%	14%
49-907	Maintenance and Repair Workers, General	36,815	1%	6%	16%	21%	24%	23%	9%
41-401	Sales Representatives, Wholesale and Manufacturing, Except Technical and	33,124	0%	4%	18%	23%	24%	22%	9%
31-113	Nursing Assistants	32,461	2%	22%	22%	20%	17%	13%	5%
43-303	Bookkeeping, Accounting, and Auditing Clerks	29,704	0%	4%	13%	18%	24%	25%	15%
43-601	Secretaries and Administrative Assistants, Except Legal, Medical, and Execu	29,211	1%	7%	15%	18%	24%	23%	12%

In 2020, Indiana had 148,169 individuals employed in the State but living outside the State. In comparison, 189,046 individuals lived in the State but were employed outside of the State, making Indiana a net exporter of talent (-40,877 workers).[1] A majority of Indiana's outflow workers were between the ages of 30-54 (54.0%), followed by 55 years or older (24.2%), and 29 years or younger (21.9%). A majority of workers in-flowing into Indiana were between the ages of 30-54 (50.7%), followed by 29 years or younger (25.2%), and 55 years or older (24.1%). For comparison, the majority of workers that live and work in Indiana are between the ages of 30-54 (51.4%), 29 years or younger (25.0%), and 55 years and older (23.6%).

Leveraging commuting data from the U.S. Census Bureau's American Community Survey, workforce migration in each of the Economic Growth Regions is detailed in Table 26.

[1] Source: OnTheMap, U.S. Census Bureau, 2020 (most recently available data)

Table 26: Commuting Patterns in Economic Growth Regions, 2020 (source: Indiana Business Research Center)

EGR	Commuting FROM this Region TO	Commuting TO this Region FROM
EGR 1	• Cook, IL (14.04%) • Will, IL (1.65%) • St. Joseph, IN (1.20%)	• White, IN (9.60%) • Benton, IN (8.31%) • Fulton, IN (5.99%)
EGR 2	• Berrien, MI (0.83%) • LaGrange, IN (0.62%) • Cass, MI (0.61%)	• Cass, MI (39.44%) • Starke, IN (29.99%) • LaGrange, IN (26.25%)
EGR 3	• Elkhart, IN (1.96%) • Kosciusko, IN (1.49%) • Marion, IN (0.34%)	• Blackford, IN (28.23%) • Paulding, OH (21.20%) • Jay, IN (12.30%)
EGR 4	• Marion, IN (2.09%) • Hamilton, IN (1.63%) • Boone, IN (1.25%)	• Pulaski, IN (14.86%) • Parke, IN (8.47%) • Newton, IN (6.26%)
EGR 5	• Marion, IN (34.95%) • Batholomew, IN (1.06%) • Delaware, IN (0.75%)	• Rush, IN (30.88%) • Tipton, IN (26.78%) • Henry, IN (21.66%)
EGR 6	• Madison, IN (3.81%) • Marion, IN (3.16%) • Hancock, IN (1.81%)	• Preble, OH (8.33%) • Madison, IN (6.91%) • Franklin, IN (5.64%)
EGR 7	• Marion, IN (3.16%) • Hendricks, IN (2.42%) • Montgomery, IN (0.95%)	• Clark, IL (12.33%) • Greene, IN (11.68%) • Edgar, IL (9.67%)
EGR 8	• Marion, IN (2.47%) • Dubois, IN (1.82%) • Bartholomew, IN (1.22%)	• Pike, IN (7.57%) • Crawford, IN (7.55%) • Morgan, IN (6.20%)
EGR 9	• Hamilton, OH (7.51%) • Boone, KY (1.73%) • Marion, IN (1.48%)	• Brown, IN (20.17%) • Trimble, KY (18.94%) • Scott, IN (18.83%)
EGR 10	• Jefferson, KY (26.43%) • Jackson, IN (1.18%) • Orange, IN (0.50%)	• Orange, IN (8.37%) • Jefferson, IN (7.60%) • Meade, KY (3.45%)
EGR 11	• Henderson, KY (0.87%) • Daviess, KY (0.81%) • Daviess, IN (0.60%)	• Wabash, IL (31.08%) • Henderson, KY (24.77%) • Lawrence, IL (24.47%)
EGR 12	• Hamilton, IN (6.74%) • Hendricks, IN (4.38%) • Johnson, IN (2.75%)	• Hendricks, IN (42.87%) • Hancock, IN (41.86%) • Johnson, IN (39.88%)

Indiana is tracking the potential risk automation may have on occupations across the State. Using Lightcast's U.S. Automation Index analysis, occupations that are "at risk" have an automation index score above 100, whereas those "below risk of automation" have an index score below 100.[1]

At the 2-digit SOC level, occupations most at risk of automation include Food Preparation and Serving Related Occupations (125.4); Construction and Extraction Occupations (123.2); Building and Grounds Cleaning and Maintenance Occupations (122.5); Production Occupations (113.6);

Transportation and Material Moving Occupations (111.0); Farming, Fishing, and Forestry Occupations (109.9); and Installation, Maintenance, and Repair Occupations (108.8).

The impact that these occupations have on Indiana's industries is significant. The industries most impacted by occupations at-risk of automation include Accommodation and Food Services (89.6% of jobs); Transportation and Warehousing (81.9% of jobs); Mining, Quarrying, and Oil and Gas (81.5% of jobs); Construction (75.5% of jobs); and Manufacturing (75.5% of jobs).

It is worth noting, however, that automation does not necessarily equate to job losses. Job displacement may occur during the transition to automation; however, there will be a need to upskill the workers in impacted industries and occupations to be able to monitor, troubleshoot, and repair the automated processes they oversee. The greatest risk, as it relates to automation, is that the workforce may not be ready to perform the required tasks – not that jobs will disappear entirely. The State of Indiana recognizes that social benefits may occur with automation trends. For example, some of the sectors that have higher likelihood of automation (e.g., Accommodation and Food Services, Transportation and Warehousing, etc.) do not pay living wages. These are the jobs employers struggle to fill and most likely to be disproportionately staffed by underserved communities and women. Indiana is driven to ensure workers have the foundational skills needed for a new kind of entry-level job, one that likely requires more technological skills.

Figure 14: Percent of Total Jobs by Industry At-Risk of Automation (source: Lightcast)[2]
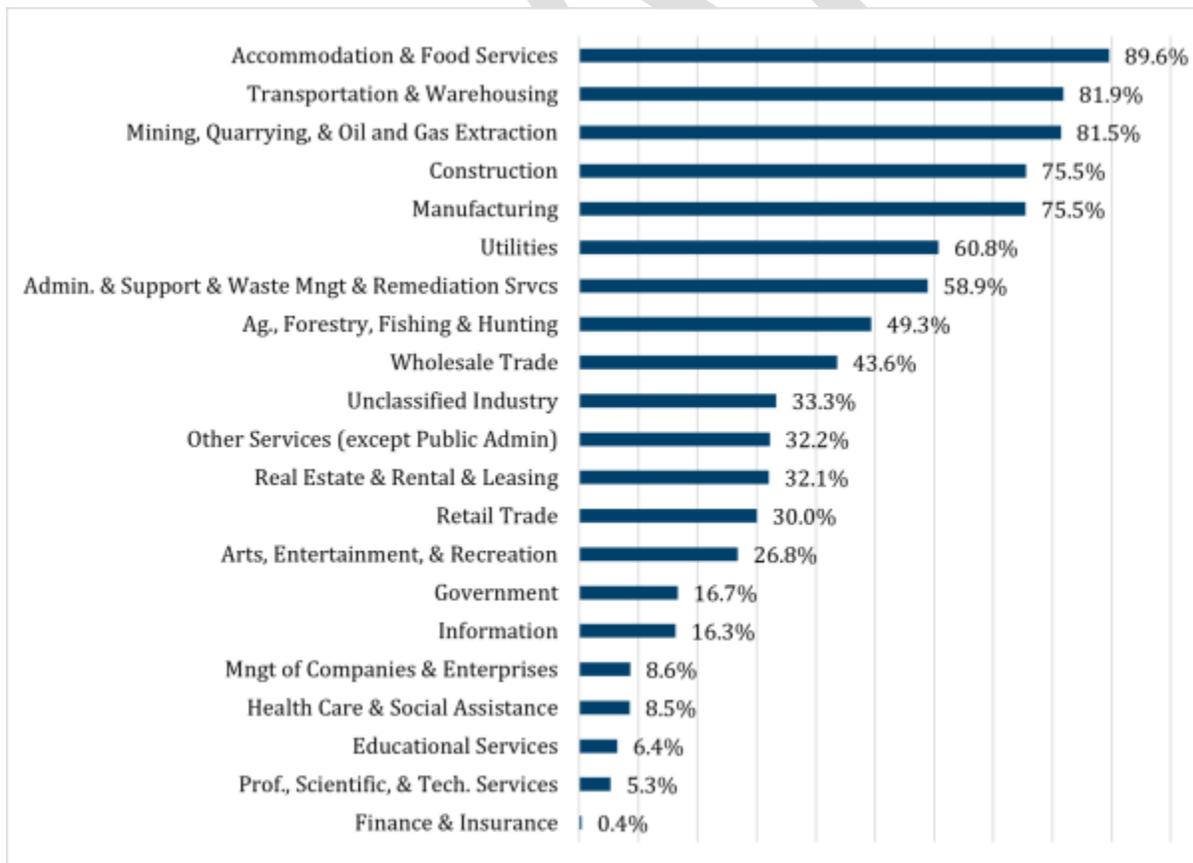
[1] Lightcast combines data with the Frey and Osborne findings at the occupation level to identify which job tasks are "at risk" and which are resilient. Lightcast also incorporates data to identify where occupations cluster in industries facing disruption, and where workers' skills mean their nearest job options are also facing automation risk. This is a 100-based index.

[2] Source: Lightcast 2023.2, Inverse Staffing Patterns with manual calculation & analysis

When considering the future workforce that may be impacted by occupations most at-risk of automation (ages 14-34), Food Preparation and Serving Related Occupations poses the greatest risk. These entry-level occupations do not require extensive training or experience. While these occupations have not traditionally provided competitive wages, they have provided younger workers with initial workforce experience. With automation impacting these occupations, Indiana will need to align with workforce and education and training partners to get younger populations into a work-based learning experience (e.g., registered apprenticeship program, internship, etc.) where they can earn hands-on experience and industry-recognized credentials into Indiana's emerging and existing industries.

Table 27: Age of Current Workforce of Occupations Most At-Risk of Automation, 2022 (source: Lightcast)[1]

SOC Code	Occupation At-Risk of Automation	Age 14-18	Age 19-24	Age 25-34	Age 35-54	Age 55-64	Age 65+
35-0000	Food Preparation & Serving Related	21.4%	22.3%	18.9%	25.0%	8.2%	4.3%
37-0000	Building & Grounds Cleaning & Maintenance	2.9%	10.7%	17.2%	41.0%	18.9%	9.3%
45-0000	Farming, Fishing, & Forestry	6.0%	10.6%	22.1%	36.9%	15.3%	9.0%
47-0000	Construction & Extraction	1.3%	10.4%	21.9%	45.3%	16.2%	5.0%
49-0000	Installation, Maintenance, & Repair	1.1%	8.0%	19.5%	45.1%	20.3%	6.0%
51-0000	Production	1.1%	9.2%	20.9%	44.6%	19.3%	4.9%
53-0000	Transportation & Material Moving	3.6%	16.5%	25.7%	24.0%	21.2%	8.9%

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[1] Source: Lightcast 2023.2, Occupation Demographics Table

iii. _Education and Skill Levels of the Workforce:_ *Provide an analysis of the educational and skill levels of the workforce.*

In 2021, Indiana's educational attainment followed national trends with a few notable exceptions. The State lags behind the nation in the share of residents with a graduate degree or higher, 11.2% compared to 14.7%, and it had a slightly smaller proportion of its population end their education prior to completing high school. This indicates that Indiana has a large share of "middle skill" workers, which is in keeping with its strong manufacturing, transportation and logistics, and health care industry base.

Aligning with trends related to "middle-skill" job growth, Ivy Tech Community College's statewide Skills Training (or industry-aligned, non-credit courses) courses have witnessed a rapid increase in employer demand for custom training. As of 02/12/2024, 15,049 students are currently enrolled in Skills Training courses, which is a 43% point in time increase from the same time period in 2023. The increased demand for Skills Training follows ongoing employer Skills-Based Hiring trends as well.

Adults Age 18 to 64 without a High School Diploma or HSE, 2024

Indiana = 415,896 adults
(10.1% of total age group)

Number of Adults

- 253 – 1,500 (29)
- 1,501 – 3,000 (32)
- 3,001 – 5,000 (12)
- 5,001 – 74,937 (19)
- Economic Growth Region

Labels also show the percent of adults in this age group without a high school diploma or high school equivalency (HSE).

Map produced by the Indiana Business Research Center, using the American Community Survey 2020-2024 five-year estimates that were released by the U.S. Census Bureau in January 2026.

Indiana counties that have the largest share of adults (ages 18-64) without a high school diploma or high school equivalency (HSE) are concentrated in LaGrange (46.4%), Daviess (28.2%), Elkhart (19.8%), and Noble (17.5%) counties. Indiana is home to 19.0% of the nation's Amish population (ranking third after Pennsylvania and Ohio), and these populations are largely concentrated within these counties. Traditional Amish schools complete education in the eighth grade, which skews the high school graduation or HSE rates in these counties.

The Indiana Department of Education (IDOE) released data related to the State's graduation rate. In 2024, the State graduation rate was 90.2%, up from recent prior years. Graduation rates in 2024 for traditional public-school corporations were 92.5% whereas the graduation rate for charter schools was 58.6%.

As the statewide graduation rate rose in 2024, overall, as many students continued to recover from the academic impacts of pandemic-related learning disruptions, there were successful outcomes from the 2024 graduation data. Statewide graduation rates increased between 2022 and 2024 for.

- Black students: increased from 77.5% to 83.9%

- Hispanic students: increased from 82.7% to 87.8%

- English Learners: increased from 85.0% to 89.5%

- Special education students: increased from 76.4% to 85.3%

- Students receiving free and reduced-price meals: increased from 83.7% to 91.5%

Despite these successes, Indiana recognizes the need to increase the statewide high school graduation rate and propel students toward a career path beyond high school.

Education requirements by employers vary among industry sectors. In June 2022, Conexus Indiana released its *State of Indiana's Advanced Manufacturing Workforce* report. Upon surveying hundreds of advanced manufacturing organizations of varying sizes across the State, they discovered 77.0% of organizations require a high school diploma or equivalent for positions. These positions were concentrated in production and machine operators. Just 16.6% of positions require a bachelor's degree or higher, with many of these positions in engineering, IT, administration, and leadership, followed by 4.8% of positions requiring a two-year degree, and 1.6% of positions requiring a vocational trade certificate.[3]

The life sciences industry, like manufacturing, is an economic driver for the State of Indiana, especially with pharmaceutical giant, Eli Lilly, Inc. headquartered in Indianapolis. BioCrossroads, a life sciences initiative that advances Indiana's signature strengths in the life sciences by connecting with corporate, academic, and philanthropic partners, developed a 2022 report titled, *BioCrossroads and the Indiana Life Sciences Ecosystem: Tracking Two Decades of Progress and Charting a Path for Sustained Success*. Through data research and analysis via Lightcast, BioCrossroads discovered that Indiana's life sciences sector remains heavily oriented around not only well-educated scientists and medical doctors, but also many in production and technician positions that are considered "middle-skill" occupations. Life sciences companies rely heavily on a workforce of skilled technicians (both in engineering and scientific domains), production workers with varied skills, transportation and material moving occupations, and others, such as installation, maintenance, and repair. These middle-skill occupations represent well over one-third of jobs in the life sciences sector (42%), compared to just 32% for all other industries in the State.[4]

According to BioCrossroads 2020 Report, the number of graduates with an associate's degree or higher in health and clinical sciences fields was 10,331. The number of bioscience graduates in 2020 was 1,617 and the number of enrolled medical students was 365 in 2020.[5]

As Indiana rebounds from the COVID-19 pandemic, the demand for post-secondary credentials increases. As detailed in Figure 13, over the next ten years (2022-2032), jobs that require an

Associate's degree (10.3%), Bachelor's degree (11.9%), Master's degree (15.2%), and Doctoral or professional degree (7.9%) are projected to increase.[6] Jobs that do not require postsecondary education remain critically important to the Hoosier economy, however, an increasing share of jobs will require a postsecondary credential as an entry-level requirement.

Figure 15: Percent Jobs Change by Education Levels in Indiana, 2022-2032 (source: Lightcast)
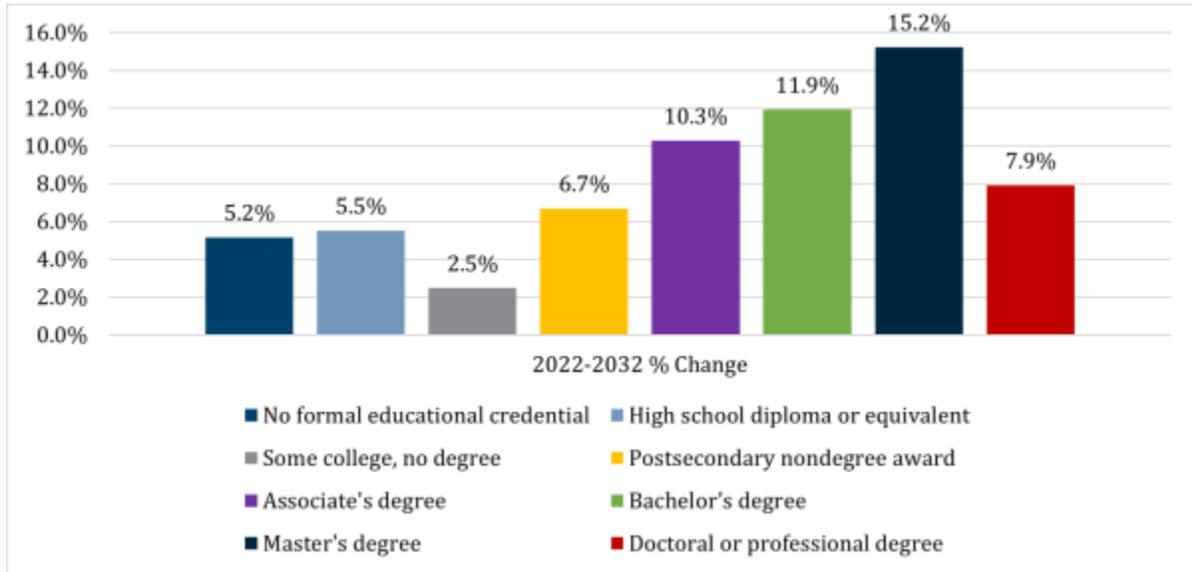
Jobs with lower education requirements are more susceptible to disruption from automation than jobs requiring bachelor's and graduate degrees. Because Indiana's Black and Hispanic/Latino residents earn postsecondary credentials at lower rates and disproportionately work in jobs with lower educational requirements, it follows that Hispanic/Latino and Black workers would be at greater risk for automation than White or Asian workers.[1] The available data on automation risk, when broken out by race/ethnicity, shows this to be the case for Indiana's Hispanic/Latino workers, American Indian or Alaskan Native workers, Native Hawaiian or Other Pacific Islander workers, Black workers, and male workers. This data was compiled by occupation employment numbers in Indiana by demographics (gender and race/ethnicity) and calculated to determine automation risk. Automation risk is categorized as Low (72-94), Intermediate (95 - 116), and High (117 - 139).

[1] Note: data provided for Native Hawaiian or Other Pacific Islander and Two or More Races was a small sample size.

Figure 16: Employment Demographic in Jobs by Automation Risk, Indiana, 2022-2032 (source: Lightcast)
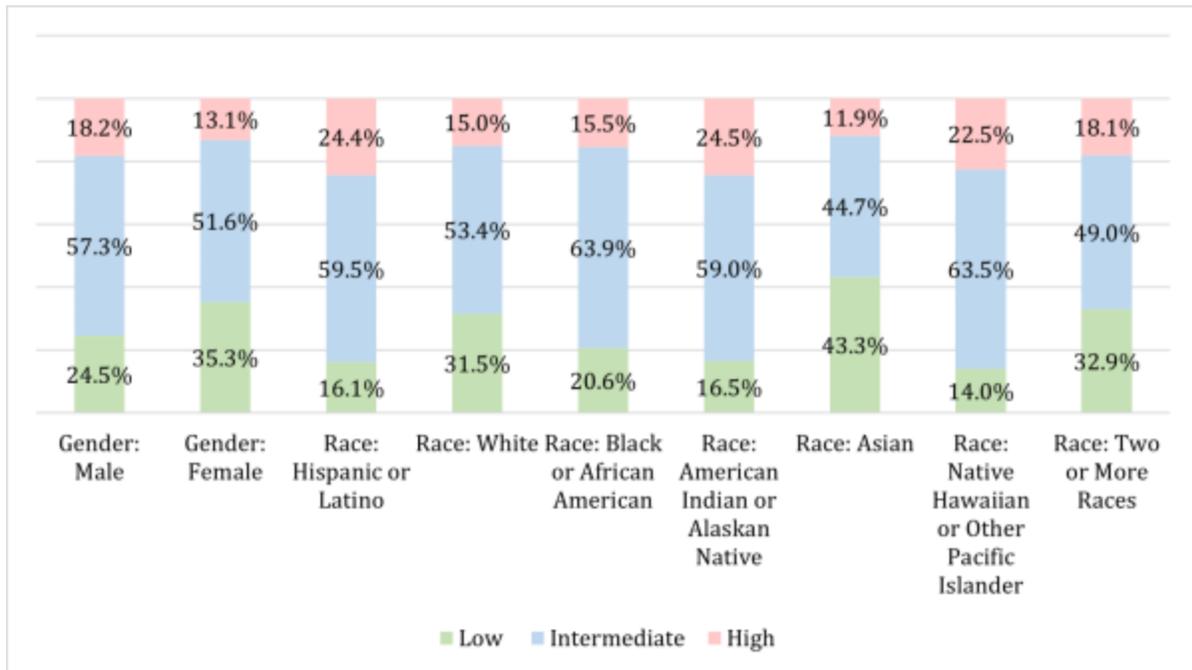
[1] Source: Indiana Department of Education, 2022 Federal Graduation Rate Data

[2] Source: Indiana Department of Education, 2022 Federal Graduation Rate Data

[3] Source: https://www.conexusindiana.com/wp-content/uploads/2022/07/AMW-FINAL-PDF-1.pdf

[4] Source: https://www.cicpindiana.com/wp-content/uploads/2022/10/BioCrossroads-Ecosystem2022-webready.pdf

[5] Source: https://www.cicpindiana.com/wp-content/uploads/2022/10/BioCrossroads-Ecosystem2022-webready.pdf

[6] Source: Lightcast 2023.3, Occupational Staffing Patterns by Entry-Level Education Requirements

With the continued incorporation of automation into the workplace comes with it the demand for increased digital skills among Hoosier workers. TechPoint, the growth initiative for Indiana's digital innovation economy, released a 2023 report titled *Seismic Shifts in the Talent Landscape: 2023 TechPoint Indiana Tech Workforce Report,* which revealed hiring trends by employers seeking tech talent across all industries. The most in-demand technical skills sought after by employers include agile methodology, automation, software development, and software engineering.[1] SQL programming language remains the most referenced technical software skill, but Python programming language and Amazon Web Services have increased significantly since 2021.

Indiana employers continue to significantly restrict their talent pools by over relying on bachelor's degrees and years of experience as a proxy for skills and competency. Across tech roles, 47.6% of job listings called for a bachelor's degree in 2022 and 24.6% called for an associate degree. Only 33.6% of job descriptions in 2022 did not call for a specific degree requirement or accepted a high school diploma as a minimum requirement. By focusing on degrees and years of service, companies significantly reduce their pools of candidates, eliminating many who have the skills and competencies to fill the positions, but get screened out. In 2022, 29.8% of descriptions listed no specific number of years required. Nearly 8 percent required one year of experience.[2] Through the collaborative partnerships of TechPoint, the Markle Foundation, and other TechPoint partners, TechPoint has begun reducing Indiana tech employers' reliance on degrees, credentials, and year of experience.

[1] Source: https://techpoint.org/wp-content/uploads/2023/01/2023-TechPoint-Tech-Workforce-Report.pdf (Job Postings Analysis)

[2] Source: https://techpoint.org/wp-content/uploads/2023/01/2023-TechPoint-Tech-Workforce-Report.pdf (data collected via Lightcast)

iv. _Comparison of Economic and Workforce Analytical Conclusion_: *Describe areas of opportunity for meeting hiring, education, and skills needs identified in the economy compared to the assets available in the labor force in the state.*

The State of Indiana, like other states, is grappling with the challenges of developing talent for the increasing and changing demands of a nimble workforce. Advances in technology and a rapidly evolving economy have led to historically low unemployment rates coupled with urgent questions about whether K-12 and post-secondary systems are truly preparing learners for the careers of today and tomorrow. Indiana is facing workforce challenges on multiple fronts, including a tight labor market, the ongoing retirement of the Baby Boomers, the relatively high and persistent demand in industries and occupations that do not require formal training beyond high school balanced with the need to upskill workers to compete for jobs that increasingly require digital skills, and competing demand for the skilled trades due to a once in a generation investment from the federal government. However, these challenges also present the State with opportunities. For example:

- As employers invest in automation to increase efficiency and mitigate long-term demographic shifts in the labor market, the State has the opportunity to focus on skill transformation to move workers into quality, family-sustaining jobs.

- The tight labor market and federal investment requirements will continue to incentivize employers to think outside the box in terms of activating disconnected and underserved workers and redefining what a "good job" looks like, including benefits, opportunities for advancement, and flexibility.

- Indiana's emerging industries and the workforce demand generated by new federal investments will necessitate a "yes, and…" approach to providing education and training to meet the full range of jobs that will be in demand, including the skilled trades, the social services sector, and STEM. The State will continue to build upon recent legislation to promote work-based learning, increase high school graduation and college-going rates, and incentivize training enrollment in high-demand fields.

The State is well-positioned to provide the education and skills in demand now and in the future due to its nationally recognized postsecondary education system, forward thinking sector and community partnerships, and state-level coordination around workforce planning to meet the demand generated by emerging opportunities and federal investments.

The collaborative spirit of workforce system partners contributes to the coordinated hiring, training, and placement of all Hoosiers. To strengthen this collaboration, additional areas for opportunity include:

- **Data Sharing**: allowing for better understanding of who the State serves, where they are being served, and how the State serves them.

- **Co-Enrollment**: packaging services that work together to meet Hoosiers' unique needs.

- **Co-Location**: improving customer service by strategically locating staff to help break down barriers for individuals when they access State services.

- **Cross-Training**: increasing State, local, and front-line staff knowledge across Indiana's talent development system to better serve Hoosiers.

- **Employer Engagement**: sharing information with Hoosier businesses about the benefits of Indiana's talent development system and encouraging them to engage with underserved and underrepresented populations.

2. Workforce Development, Education and Training Activities Analysis

The Unified or Combined State Plan must include an analysis of the workforce development activities, including education and training in the State, to address the education and skill needs of the workforce, as identified in (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) above. This must include an analysis of-

A. ***The State's Workforce Development Activities***: *Provide an analysis of the State's workforce development activities, including education and training activities of the core programs, Combined State Plan partner programs included in this plan, and required [6] and optional one-stop delivery system partners.[7]*

[6] Required one-stop partners: In addition to the core programs, the following partner programs are required to provide access through the one-stops: Career and Technical Education (Perkins), Community Services Block Grant, Indian and Native American programs, HUD Employment and Training programs, Job Corps, Local Veterans' Employment Representatives and Disabled Veterans' Outreach Program, National Farmworker Jobs program, Senior Community Service Employment program, Temporary Assistance for Needy Families (TANF) (unless the Governor determines TANF will not be a required partner), Trade Adjustment Assistance programs, Unemployment Compensation programs, and YouthBuild.

[7] Workforce development activities may include a wide variety of programs and partners, including educational institutions, faith- and community-based organizations, and human services.

A. The State's Workforce Development Activities

In late 2024, Governor Braun announced a new cabinet model, creating "verticals" within the administration for core governance areas. The Office of Commerce was established to oversee Indiana's workforce and economic development functions. The Indiana Department of Workforce Development (DWD) and the Indiana Economic Development Corporation (IEDC), along with several other entities, are housed with the Commerce Vertical, improving connection and aiming to increase efficiency and communication. As a result, DWD and IEDC are working closely together on various workforce and economic development initiatives.

The State Workforce Development Board (SWDB), reconstituted by Executive Order 25-77, replaces the Governor's Workforce Cabinet (GWC), which was dissolved by legislation effective July 1, 2025. The SWDB will bring together State agencies, employers, education and training providers, and other interested stakeholders with the intention of supporting the state's priorities of wage growth and job creation. State government representatives from WIOA's core programs are represented on the SWDB, with three of the four titles operated by Indiana Department of Workforce Development (WIOA Titles I, II, and III) and Title IV operated by the Family and Social Services Administration's Bureau of Rehabilitation Services.

Indiana's current workforce system operates in 12 geographically defined regions, with plans to realign regions consistent with Executive Order 25-45 (https://www.in.gov/gov/files/EO-25-45.pdf) during PY2026-2027. More information about this realignment project can be found in Sections II(c)(2) and VI(a)(1). To date, there are 19 comprehensive offices known as WorkOne Centers (Indiana's term for American Job Centers) throughout the State. In addition to the comprehensive offices, Indiana has more than 70 WorkOne affiliate sites and access points across the State. Some

counties with lower population totals utilize mobile services and rotating staff, which strategically travel across regions to best reach the individuals in need of services.

Each region currently includes one local workforce development area (LWDA) with a local workforce development board (LWDB) and a designated regional chief elected official. The board in each LWDA oversees local programs and funding needs and manages allocations and programs to meet the needs of their specific area. One goal of the LWDBs is to use the funding and services across Core and Partner Programs in the most efficient manner to best provide individuals with a quality outcome. The LWDBs also serve employers within the region by helping meet their talent needs. LWDB training was developed by Indiana Department of Workforce Development (DWD) and implemented in 2022 The training will be reviewed and refreshed as part of the implementation and transition process during regional realignment to assist LWDB members in better understanding the potential of their role and the responsibilities the board holds within the workforce system.

There are a number of regional and local programs that also operate within the workforce system and broader talent development system as a whole. By modeling better cross-agency collaboration and program integration at the State level, it is our goal for there to be better awareness and seamless delivery of the various activities and programs for individuals and employers at the local level.

Core Programs: A brief overview of each core program is outlined below. Additional information on each program can be found throughout the plan.

- <u>Title I – Adult</u>: Adult services funding is allocated to Indiana's LWDBs, and services are provided in three categories: basic career services, individualized career services, and follow-up services. Based upon the needs of the individual, the State of Indiana uses the appropriate activities to engage and/or re- engage a person into the workforce system. The adult program is available to anyone 18 years and older, with priority service given to those with barriers to employment (e.g., low income, long-term unemployment, ex-offender, public assistance recipient, etc.).

- <u>Title I – Dislocated Worker</u>: Dislocated Workers include workers that have been terminated or laid off, or have received a notice of termination or layoff from employment; are eligible for or have exhausted unemployment insurance; have demonstrated an appropriate attachment to the workforce, but is not eligible for unemployment insurance and is unlikely to return to a previous industry or occupation; have been terminated or laid off or received notification of termination or layoff from employment as a result of a permanent closure or substantial layoff; are employed at a facility where the employer has made the general announcement that the facility will close within 180 days; were self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community or because of a natural disaster; or are a displaced homemaker who is no longer supported by another family member.

- Title I – In-School Youth: In-school youth are classified as youth who are attending secondary or postsecondary schools, not younger than the age of 14 and not older than 21 (unless an individual with a disability who is attending school under State law) at time of enrollment. These youth are from low income backgrounds and may be basic skills deficient, an English language learner, an offender, a homeless individual or runaway, an individual in foster care or who has aged out of the foster care system, or has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under the social security act, an individual who is pregnant or parenting, an individual with a disability or an individual who requires additional assistance to complete an educational program or to secure or hold employment.

- Title I – Out-of-School Youth: Out-of-School youth are classified as youth who are not attending any school (as defined under State law), not younger than 16 nor older than 24 at the time of enrollment. These youth may be a school dropout, a youth who is within the age of compulsory school attendance but has not attended school for at least the most recent complete school year calendar quarter; a recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either basic skills deficient or an English language learner; an offender; a homeless individual, a homeless child or youth, or a runaway; an individual in foster care or who has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under the social security act, or in and out-of- home placement; an individual who is pregnant or parenting; an individual with a disability; or a low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

- Title II – Adult Education and Family Literacy Act: Adult education in Indiana ensures individuals have access to educational and career services. Through foundational skills development, adult education provides the remediation and advancement in academic competencies that allow Hoosiers the prospect of social and economic mobility.

- Title III – Wagner-Peyser: Wagner-Peyser funds provide State staff in the WorkOne Centers to support jobseekers, to provide employer engagement and recruitment services, and to fund the labor exchange/job matching system. Employer services are also provided through an online labor exchange system or through business service staff in WorkOnes. The goal of the Wagner-Peyser program is to bring together individuals seeking employment with employers seeking workers.

- Title IV – Vocational Rehabilitation: Vocational Rehabilitation services provide quality individualized services to enhance and support people with disabilities to prepare for, obtain or retain employment. Indiana Vocational Rehabilitation (VR) is a program for high school students and adults with disabilities. VR counselors can help eligible individuals with an identified disability (IEP or a 504 plan or with other physical, mental health, or learning concerns) gain skills, find a job, and start a career.

Partner Programs: A brief overview of partner programs is outlined below. Additional information regarding Core and Partner program collaboration is included throughout the Plan.

- Senior Community Service Employment Program (SCSEP): The Senior Community Service Employment Program is a community service and work-based job training program for older Americans. Participants must be at least 55 years old, unemployed, and have a family income of no more than 125 percent of the federal poverty level. Enrollment priority is given to veterans and qualified spouses, then to individuals who are over 65 years of age, have a disability, have low literacy skills or limited English proficiency, reside in a rural area, are homeless or at risk of homelessness, have low employment prospects, or have failed to find employment after using services through the WorkOne.

- Carl D. Perkins: Career and technical education programs authorized under the Carl D. Perkins Career and Technical Educational Act and is a funding pool provided to secondary and post-secondary career and technical education programs. Recipients in Indiana are Career and Technical Education (CTE) Districts, Vincennes University, and Ivy Tech Community College.

- Trade Adjustment Assistance (TAA): TAA assists workers who have been dislocated due to foreign trade impacts. The goal of the TAA program is to help each worker participating in the program obtain suitable employment whenever possible and return to employment as quickly as possible. The TAA Program provides trade-affected workers with opportunities to obtain the skills, credentials, resources, and support necessary to become reemployed in a good job. Together with its workforce development partners in the one-stop delivery system authorized under the Workforce Innovation and Opportunity Act (WIOA), the TAA Program helps retrain, retool, and rebuild the American workforce. As of June 30, 2022, the TAA program entered into Sunset termination (TEGL 14-22). Under the phased termination of the TAA program, the State is only able to serve and conduct outreach to individuals who had a TAA certification occurring prior to the termination of the program.

- Jobs for Veterans State Grant Programs (JVSG): JVSG funds are provided to states to fund two staff positions: the Disabled Veterans' Outreach Program Specialist (DVOP) and the Local Veterans' Employment Representative (LVER). These positions are fully integrated into the WorkOne offices. The DVOP's role is to provide individualized career services to veterans and other eligible persons with significant barriers to employment through case management. The LVER's role is to facilitate employment opportunities and advocate on behalf of veterans with employers.

- Unemployment Insurance (UI): In the State of Indiana, an individual is eligible for UI after submitting a claim through either the internet or through the nearest full service WorkOne Career Center. Information required to complete a claim includes the last employer's name, mailing address, phone number, and the dates of employment. Additionally, an individual must submit their address, social security number, and a telephone number.

- Temporary Assistance for Needy Families (TANF) Program: TANF provides financial assistance to families in need. To receive TANF benefits you must be a family in-need with a dependent child (a person under the age of 18, or 18 if a full-time student in secondary school). These individuals/families must meet income requirements which vary dependent on the size of the assistance group. Individuals must meet State residency, citizenship/immigration status, employment, and child support assignment requirements.

- Supplemental Nutrition Assistance Program (SNAP E&T) and Temporary Assistance for Needy Families (TANF): Indiana Manpower Placement and Comprehensive Training (IMPACT) provides services designed to help recipients of SNAP and TANF achieve economic self-sufficiency through education, training, job search and job placement activities. IMPACT offers much more than a job training services because it seeks to address a broad range of barriers that may inhibit individuals from seeking and maintaining employment.

B. *The Strengths and Weaknesses of Workforce Development Activities*: *Provide an analysis of the strengths and weaknesses of the workforce development activities identified in (A), directly above.*

Strengths:

Indiana's workforce system has many strengths that allow for flexibility to respond to the ever-changing economy to serve individuals and employers.

Promoting Skill Development, Increasing Wages, and Removing Barriers through Complementary Programs

Indiana strengthens workforce development through job training programs and complementary programs that provide training, wage growth, and barrier removal.

- Power Up Initiative and other Job Training Programs: Offers tuition-free training for short-term credentials and company specific training in high-demand fields.

  o Workforce Ready Grant (WRG): Covers approved certificate programs in sectors like advanced manufacturing, health sciences, IT, and logistics for residents with a high school diploma but no degree.

  o Power Up Indiana: Reimburses employers up to $5,000 per trained employee (max $50,000 annually) in high-demand sectors with a focus on wage growth following training.

- Work-Based Learning & Apprenticeship : Expands registered apprenticeships, develops scalable programs, and builds public-private partnerships.

- Additional State-Supported Programs:

- o Career Scholarship Account (CSA): $5,000 annually for high school students to pursue work-based learning and credentials.

    - o Adult Student Grant: $2,000 for working adults completing degrees or certificates.

    - o Hoosier Initiative for Re-Entry (HIRE): Employment-focused program for justice-involved individuals; over 18,000 placed since 2012.

- Technology & Digital Readiness:

    - o PIVOT: AI tool connecting UI claimants to training.

    - o WIN Career Readiness: Digital skills training; nearly 40,000 adults served in 5 years.

- Access to Credentials of Value:

    - o WRG funding tripled to $12M in 2024; over 47,000 Hoosiers trained since 2017.

    - o Early childhood education added to job training programs.

    - o Career Scholarship Account and CTE grants incentivize credential completion in high school.

Indiana's Nationally Acclaimed Colleges and Universities

Indiana is home to seven public postsecondary institutions, comprised of nationally recognized research institutions, including three 'R1' designated research institutions, affordable four-year colleges and universities, and the state's oldest public institution, Vincennes University, which offers both two- and four-year degrees. Indiana also contains the nation's largest singly accredited community college system, Ivy Tech Community College. Alongside public institutions, the state is home to over 30 private colleges and universities.

Affordability is a cornerstone of Indiana's postsecondary system. Each year, the state makes available over $400 million in financial aid. Indiana is ranked first in the Midwest and fifth in the nation in providing need-based aid. The state ranks sixth in the nation in holding the line on tuition and mandatory fee increases.

Philanthropic and Sector Partnerships

Another unique strength of Indiana's workforce development activities is the philanthropic and sectoral partnerships that exist, providing Indiana with an opportunity to leverage public and private philanthropic partnerships in a way that few states can. This provides Indiana the ability to better understand national best practices, innovate through pilot programs, and braid resources to scale promising practices. These partnerships allow for Hoosiers across the State, regardless of if they live in rural, suburban, and urban areas, additional opportunities to receive the support necessary to better their lives.

The SWDB can provide these philanthropic and sector partnership organizations with a single-entry point into the talent development system. Listed below are just a few that the State works with to continually strengthen the statewide workforce development system:

- The **Lumina Foundation** is an independent, private foundation in Indianapolis that is committed to making opportunities for learning beyond high school clearer and more accessible for everyone. Lumina Foundation works in partnership with education and business leaders, civil rights organizations, policymakers, and individuals who want to reimagine how and where learning occurs. The foundation envisions a system that is easy to navigate, delivers fair results, and meets the nation's need for talent through a broad range of credentials. Working with governmental, nonprofit, and private-sector organizations to bring about change, Lumina relies on communications outreach, meetings, and events that engage and mobilize people, State and Federal policy outreach, investments in proven and promising practices, and targeted efforts to measure and evaluate progress.

- The **Lilly Endowment Inc.** is a private philanthropic foundation based in Indianapolis, created by pharmaceutical giant Eli Lilly and Company. The Endowment helps organizations realize their community development and education potential by providing funding, consulting and technical assistance, research and evaluation support, and connections to other organizations with relevant aims and experience. State workforce development efforts are greatly impacted by the investment and support of the Endowment.

- **Central Indiana Corporate Partnership (CICP)** fosters growth and innovation in crucial sectors in Indiana's economy and brings together leaders from many of the State's corporations, foundations, and universities while encouraging conversation and collaboration. CICP has identified and supports five talent and industry sector initiatives, focused on agbiosciences, talent and workforce development, life sciences, advanced manufacturing and logistics, and technology. CICP has created an advanced industry initiative for each of these sectors and each initiative supports the growth of its respective industry. Lilly Endowment Inc. provides financial support for the CICP Foundation's 2charitable, educational, and scientific activities:

  - **AgriNovus Indiana** is a nonprofit coalition of leaders across industry, academia, and government focused on growing Indiana's agbioscience economy across food, animal health, plant science, and agtech.

  - **Ascend Indiana** is committed to making Indiana a place of economic opportunity for all. It connects jobseekers to good and promising career opportunities through an innovative job matching platform, the *Ascend Network*; catalyzes partnerships with universities and employers, provides consulting services to meet high-demand workforce needs; and conducts research to enable systems-level change that positively impacts individuals throughout the State.

- **BioCrossroads** is Indiana's initiative to grow the life sciences, a public-private collaboration that supports the region's research and corporate strengths while encouraging new business development. BioCrossroads provides funding and support to life science businesses, launches new life science enterprises, expands collaboration and partnerships among Indiana's life science institutions, expands science education, and markets Indiana's life sciences industry. The initiative has formed several new nonprofit organizations including Indiana Health Information Exchange, BioCrossroadsLINX, OrthoWorx, Datalys Center, and the Indiana Biosciences Research Institute.

- **Conexus Indiana** maintains and grows Indiana's competitive advantage as a global advanced manufacturing powerhouse and logistics hub. Since 2007, Conexus Indiana has engaged thousands of industry, academic, public- sector and philanthropic leaders to develop skilled talent, as well as identify and create opportunities for future business growth. Conexus has developed and delivered several programs, such as high school curriculum, internship programs, and convened industry councils to move the needle forward in the manufacturing industry.

- **TechPoint** is the industry-led growth initiative for Indiana's digital innovation economy and overall tech ecosystem. The team is focused on working with public, private and industry partners to expand tech talent pipeline, enhance resource connectivity for enterprise organizations and startups alike, and elevate the industry by activating the community and amplifying stories of success. TechPoint recently launched Mission41K, a collaborative movement to address tech employer talent needs through skills-based hiring, inclusive pathways, and apprenticeships to grow Indiana's tech workforce by 41,000 workers by 2030.

- **Credential Engine** aims to ensure the economic stability and prosperity of Indiana. Through analyzing the workforce needs of Indiana employers, as well as the skills necessary for individuals to find living-wage employment, Credential Engine provides the foundation for important tools for both employers and students to obtain the information they need to make strategic decisions about credential and career pathways. One of the most important aspects of Credential Engine has been the construction of agreed-upon competencies between post-secondary institutions. This has led to a statewide general education core, where, if a student earns the required courses, those courses are accepted to any Indiana postsecondary institution. Collaborative data sharing agreements from the Eligible Training Provider List through the Indiana Department of Workforce Development have expanded the credential engine database to include additional skills-based credential offerings.

- **Rework America Alliance** is a nationwide partnership of civil rights groups, nonprofits, private sector employers, labor unions, educators, and others, working to get people without a college degree into better-paying jobs with opportunities for career growth,

particularly women, Black, and Latino workers. In 2023, Jobs for the Future (JFF) acquired this program from the Markle Foundation. Under JFF, the Alliance will provide opportunities for career growth and advancement into quality jobs for people without a college degree, particularly women of all racial backgrounds, and Black and Latino people. The Alliance will continue to partner with Indiana to support this work by (1) providing free access to a full virtual training program for career coaches focused on human-centered, equity-driven, and skills-based practices, (2) providing access to skills-based tools for jobseekers, including the Skill My Resume and Job Progression tools, and (3) continuing its partnership with the Indiana Chamber to provide support to employers transitioning to skills-based talent management through the Skillful Talent Series. The work of the Alliance will strengthen existing partnership JFF has in Indiana, including the Youth Apprenticeship Intermediary Site with Horizon Education Alliance, the Job Quality Academy with EmployIndy and Northern Indiana Workforce Board, the Community College Workforce Consortium member of Ivy Tech Community College, and more.

- **Central Indiana Community Foundation** mobilizes people, ideas, and investments to make this a community where all individuals have the opportunity to reach their full potential. The foundation has existed for more than 100 years. In that time, they have created lasting and truly meaningful change in (central) Indiana. They continue to study and focus on: wage disparity; breaking the cycle of generational poverty by supporting youth; and access to opportunities. CICF administers general grant application rounds each year. During these open application windows, eligible 501(c)(3) organizations may submit a request for consideration. Each request submitted will be assigned to a community leadership officer, assessed, and then aligned with the fund or funds deemed most appropriate for consideration. These may include community endowed funds, donor-advised funds, field-of-interest funds, or major funds held at CICF. Alignment will be determined by staff and only after an application has been fully completed and submitted for consideration.

- The **Center of Excellence in Leadership of Learning (CELL)** at the University of Indianapolis is a leader in partnering with secondary and postsecondary schools to provide early college models for students. The Center of Excellence in Leadership of Learning at the University of Indianapolis provides leadership that is both cutting-edge and action oriented. CELL currently has a network of 100+ high schools across the state trained in the Early College model and in varying degrees of implementation. CELL is establishing a Rural Early College Network (RECN) 2.0 through a federal Education Innovation and Research (EIR) program administered by the U.S. Department of Education's Office of Elementary and Secondary Education. The RECN 2.0 will help rural Indiana schools more quickly implement the Early College (EC) high school model. Early College targets underserved students and allows them to earn both high school diplomas and up to two years of credits toward bachelor's or associate degrees through rigorous dual credit classes supported by wrap-around services.

- **Goodwill of Central & Southern Indiana's Excel Center's** mission is to change lives every day by empowering people to increase their independence and reach their potential through education, health, and employment. The Excel Center is operated by Goodwill Education Initiatives, Inc., a not-for-profit organization formed by Goodwill of Central & Southern Indiana. Recognizing that nearly a half million working-age Hoosiers lack a high school diploma, Goodwill opened The Excel Center for adults in 2010. The Excel Center is a tuition-free public high school for adults offering an Indiana Core 40 high school diploma. There are currently eighteen locations throughout central and southern Indiana, serving more than 4,200 students annually. Students at The Excel Center have "coaches" who help address challenges with transportation, childcare, health, and family situations — circumstances that can hinder progress in school. Free childcare is provided on-site for the young children of students while they are in class. The Excel Center's locations are open year-round, mornings through evenings.

- **Strada Education Foundation** supports programs, policies, and organizations that strengthen connections between postsecondary education and opportunity nationally and in its home State of Indiana, with a focus on helping people who face the greatest challenges. Strada advances its mission through research, grantmaking, and social impact investments, public policy solutions, and Strada-supported nonprofit organizations, including:

  - CAEL: helps organizations succeed among accelerating changes reshaping education and employment landscapes. They build and lead inclusive partnerships that result in agile, responsive pathways linking learning and work. By helping diverse organizations find common cause in adult learners and workers, CAEL keeps education and training providers aligned in real time, sustain healthy talent pipelines, and support enrollment in education and training programs, from badges and micro credentials to certificates and advanced degrees.

  - InsideTrack: partners with higher education institutions, workforce partners and employers to empower individuals to overcome educational and career barriers, close the widening post-secondary completion gap, bring stopped-out learners back to school, and reskill and upskill workers.

  - Roadtrip Nation: creates and distributes best-in-class career exploration content, products, and experiences to help individuals pursue fulfilling careers based on what's important to them.

Weaknesses:

Indiana aspires to continually improve how workforce activities are being carried out across the State. Some of the most prevalent weaknesses and contributing hurdles include the following:

Barriers to Alignment and Integration Across Programs & Systems:

- Data system non-integration in case management systems in part due to information privacy standard protections.

- Unfamiliarity with, and/or limited collaboration between, partner programs and systems, contributing to disconnected jobseeker referrals within the one-stop system.

- Limited opportunities for one-stop staff and partner cross-training to increase capacity, expertise, and efficiency.

Limited Awareness of Workforce System Activities & Services:

- Identified need for outreach to (1) inform Hoosiers of available workforce and supportive services and (2) elevate local best practices for statewide replications due to limited dedicated state and regional allocated funding for marketing purposes.

- Difficulty reaching "untapped" populations, especially during low unemployment, to get them upskilled and placed in a self-sustaining career.

Low Enrollment in Postsecondary Education & Training Programs:

- Limited capacity and awareness of training grants for many eligible Hoosiers to help offset the cost of training.

- Misconceptions about job quality for high-demand, high-wage occupations including socio-economic benefits for training and education beyond high school such as increased lifetime earnings, job stability, resiliency to economic downturns, and adaptability to changes in technology disruption, and more.

- Traditional training program structures that struggle to accommodate adults balancing work and life activities.

- Indiana's strong manufacturing sector may adversely affect the degree-seeking rate of Indiana high school students due to available opportunities upon high school graduation. Indiana is ranked Top 10 in the nation for secondary outcomes yet ranks in the Bottom 10 nationally for residents 25-64 holding an associate degree or higher.

Stagnant Labor Force Growth Due to Baby Boomer Retirements and Declining Birth Rate:

- As Baby Boomers age out of the workforce, Indiana will struggle to replace these workers, particularly in critical need industries such as education and healthcare & social assistance. As the population ages and lives longer, workforce shortages in Indiana's healthcare and social assistance industry, for example, will be felt more profoundly.

- The State must adequately embrace automation to increase productivity.

- Retention strategies and development of meaningful connections with employers for K-12 and post-secondary students, increasing attraction strategies for in-migration of new workers, as well as barrier assistance strategies to help historically marginalized population

groups and under employed individuals to enter or reenter the labor force will bolster labor force participation.

Indiana is working to address weaknesses through our defined goals and strategies, as detailed in Section II.b. and c.

C. _State Workforce Development Capacity_: *Provide an analysis of the capacity of State entities to provide the workforce development activities identified in (A), above.*

The strength of Indiana's workforce system is exemplified through the collaboration among partners, including those from Core and Partner Programs. In keeping with the vision of WIOA, State entities work together to increase access and opportunities to employment, education, training, and support services to employment. Indiana has championed stronger alignment of workforce, education, vocational rehabilitation, and other human services systems to improve the structure and delivery of services to Hoosiers.

Collaboration in Indiana has never been better – State agencies, industry, education, community and philanthropic partners are working together more than ever before. Partners are challenged to think globally, plan regionally, and act locally when delivering workforce development activities. The coalition of partners driving the State's workforce system will continue to work with one another to achieve successful outcomes.

B. State Strategic Vision and Goals

The Unified or Combined State Plan must include the State's strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency. This must include-

*1. **Vision:** Describe the State's strategic vision for its workforce development system.*

*2. **Goals:** Describe the goals for achieving this vision based on the analysis in (a) above of the State's economic conditions, workforce, and workforce development activities. This must include-*

(A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment[8] and other populations.[9]

(B) Goals for meeting the skilled workforce needs of employers.

[8] Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible migrant and seasonal farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families Program; single parents (including single pregnant women); and long-term unemployed individuals.

[9] Veterans, unemployed workers, and youth and any other populations identified by the State.

*3. **Performance Goals:** Using the tables provided within each Core Program section, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)*

*4. **Assessment:** Describe how the State will assess the overall effectiveness of the workforce development system in the State in relation to the strategic vision and goals stated above in sections (b)(1), (2), and (3) and how it will use the results of this assessment, which may include evaluation findings, and other feedback to make continuous or quality improvements.*

1. Vision

Indiana will be a national workforce leader, prioritizing wage growth and job creation to drive economic mobility and opportunity for all Hoosiers and Hoosier employers.

2. Goals

(A) Goals for preparing an educated and skilled workforce, including preparing youth and individuals with barriers to employment and other populations.

(B) Goals for meeting the skilled workforce needs of employers.

Under Governor Braun, Indiana's workforce and economic development systems have an enhanced focus on wage growth and job creation. Mandated by Executive Order 25-44 and reiterated through Braun's 2026 Freedom and Opportunity Agenda, Indiana's Office of Commerce is prioritizing jobs and wages to help Hoosiers advance in their careers while ensuring businesses have the talent they need to grow. These priorities carry through all levels of our workforce development system, from providing support to the diverse range of job seekers WIOA aims to serve, to offering businesses a wide range of no-cost services designed to build a skilled, reliable workforce.

With these priorities in mind, Indiana is well-aligned to advance the goals of America's Talent Strategy (ATS). Many of Indiana's current and anticipated workforce development strategies already correlate with ATS's plan to address employers' workforce needs, upskill workers, integrate systems to maximize efficiency and effectiveness, and prioritize training program and performance accountability.

To support state and federal priorities, the Indiana Department of Workforce Development (DWD) has established an agency strategic plan (DWD Plan) to deliver a proactive, outcome-driven workforce system. DWD's Plan aligns investments around three agency-specific goals: (1) improving the efficiency and reach of programs; (2) maturing data practices; and (3) simplifying customer experience and service delivery. Over the next two Program Years, components of DWD's Plan will serve as the basis for Indiana's overall workforce development strategy. DWD will collaborate with the Indiana Family and Social Services Administration's (FSSA) Bureau of Rehabilitation Services (BRS) to align WIOA Core Program strategies under two overarching goals:

GOAL 1: PREPARE FUTURE SKILLED WORKERS AND UPSKILL INCUMBENT WORKERS

Serving the Hoosier workforce is at the heart of Indiana's mission. The workforce investment system is strengthened by understanding workforce needs, aligning resources, and providing access to services, empowering Hoosiers to thrive in an ever-changing economy. The charge is simple: meet employers and jobseekers where they are, remove duplication, and scale what works.

Priorities:

- Incumbent worker training
- Occupational skills training

- Quality employment services

GOAL 2: IMPROVE SYSTEM EFFICIENCY AND SIMPLIFY SERVICE DELIVERY

Indiana aims to make our workforce system more efficient, easier to use, and better aligned with economic development. Through the statewide regional and local area realignment project, Indiana will modernize our workforce structure, promote a more balanced participant distribution, and position the state to deliver consistent, scalable, and responsive services to job seekers and employers. As our workforce system structure changes, we will evaluate service delivery models to gain efficiency and explore innovative solutions.

Priorities:
- Workforce system structure and governance
- Efficient and innovative service delivery

Collectively, these goals and their associated priorities will support Indiana in preparing an educated and skilled workforce (including youth and individuals with barriers to employment and other populations) and in meeting the skilled workforce needs of employers in alignment with the State's priorities and the ATS pillars. Strategies for achieving the above goals are detailed in Section II.c.2.

3. Performance Goals

See the Performance Indicator Appendix / Core Program tables for Indiana's performance goals.

4. Assessment

Indiana will assess the overall effectiveness of the workforce development system in the State through the following resources, ensuring data is captured, evaluated, and used to make continuous improvements:

Management Performance Hub

Indiana has been at the forefront of administrative data collection, data sharing, governance, and linked records access to allow for outcomes-based program research and evaluation through the Management Performance Hub (MPH). In addition to assessing program metrics related to federal performance goals, wages, employment, and post-secondary enrollment, industry and occupation-based analysis can be performed leveraging the MPH.

Defined Metrics

Indiana Adult Education has implemented a pay for performance funding allocation model to demonstrate the state's commitment to accountability. At the beginning of each program year, the state leadership team determines priorities aligned to state and federal goals. These goals are shared with the providers as part of the 'Programs of Excellence' initiative. Throughout the year, there is regular communication reinforcing the importance of metrics that can be tied to wage gain and increased employment. When determining the next program year's budget allocations, funding

is linked to student outcomes aligned to wage growth and employment metrics. Examples of this include completing short-term certifications, high school equivalencies attained, and incumbent worker training. By connecting program funding to workforce outcomes, Indiana is building a culture of accountability and student achievement and ensures that funding does not linger with poor performing grantees.

Labor Market Information

Indiana will use labor market indicators related to employment, unemployment, labor force participation, barriers to employment, industry growth, job postings and openings, and median wage earnings to measure progress.

Employer Feedback

Indiana will increase existing efforts to verify employer demand and talent pipeline fulfillment through direct contact with employers within sector partnerships, focus groups, business services metrics, and economic development partners to develop increased efficiencies through a systematic approach.

C. State Strategy

The Unified or Combined State Plan must include the State's strategies to achieve its strategic vision and goals. These strategies must take into account the State's economic, workforce, and workforce development, education and training activities and analysis provided in Section (a) above. Include discussion of specific strategies to address the needs of populations provided in Section (a).

1. Describe the strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D). "Career pathway" is defined at WIOA section 3(7) and includes registered apprenticeship. "In-demand industry sector or occupation" is defined at WIOA section 3(23)

2. Describe the strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available to the State to achieve fully integrated customer services consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2)

1. *Strategies the State will implement, including industry or sector partnerships related to in-demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D). "Career pathway" is defined at WIOA section 3(7) and includes registered apprenticeship. "In-demand industry sector or occupation" is defined at WIOA section 3(23).*

Upward mobility of Hoosier jobseekers and incumbent workers advances independent financial security, self-sustainability, and economic growth. Indiana is focused on addressing barriers for individuals including traditionally underserved populations, low-skilled adults, youth, and individuals with disabilities (as prescribed in WIOA Section 101(d)(3)(B)) while providing no cost or affordable career training pathways through registered apprenticeships and work and learn programs, skills-based training, career technical education, adult education, and post-secondary credentials. While there is no single state pathway for success, Indiana promotes high quality credential attainment as the primary driver of broad-based upward mobility. In addition, it is imperative that sector partnerships and employer signaling inform education and workforce training programs to keep pace with rapidly changing industry needs.

Career Pathways

Indiana recognizes the significant role of career pathway planning in helping Hoosier workers advance to better paying jobs by earning in-demand postsecondary credentials. Indiana prioritizes and encourages individuals to make informed decisions about their career pathway that (1) align with the skill needs of industry, (2) prepare them for work-based learning, skills-training or post-secondary education, (3) support their individual interest and aspiration, and (4) help them enter or advance within a specific occupation.

Over the last several years, workforce partners across the State have designed, coordinated, and launched successful career training pathway programs and resources, including but not limited to:

- Indiana Department of Workforce Development (DWD) provides Hoosier students, jobseekers, and incumbent workers with tools and resources to help guide them toward an appropriate career pathway, through tools such as **Indiana Career Explorer** (INCE) and **Top Jobs Indiana** (https://topjobs.dwd.in.gov/). INCE is a career and education and training navigator, career assessment, and graduation planning resource for K-12, young adults aged 16-24, and adults. Within INCE, individuals can take career interest and aptitude assessments, locate education and training providers by industry and occupation, and map graduation requirements needed for K-12 graduation pathways. Labor market information, including occupational demand, is embedded throughout the platform to quickly communicate Indiana's most in-demand jobs. *Tob Jobs Indiana* focuses on current and future high-demand, high-wage jobs. Individuals can access this online tool to determine which industries and occupations are most in-demand at the State, region, and county level. *Top Jobs Indiana* replaced Indiana's previous model for determining demand, *IN Demand Jobs*. Indiana adopted the INDemand Jobs system ("Flames") in 2017 to identify the in-demand occupations by state and region based on demand, growth, and earnings and subsequently used Flames to set policy across a range of workforce and education programs. HEA 1609-2023 required the Flames methodology to be reviewed and updated by January 1, 2025. The new in-demand occupation methodology, Top Jobs Indiana, went into effect in July 2025. One of the key changes to this new methodology is on new weighted indicators and additional descriptive indicators.

Weighted Indicators:

- Demand: Signals the likelihood that employment opportunities will be consistently available
- Retention: Indicates an occupation's stability and counteracts churn.
- Growth: Measures how quickly employer demand is growing.
- Earnings: Indicates the relative value employers place on an occupation.

Descriptive Indicators (not included in the actual Top Jobs score)
- Job Transferability: Indicates an occupation's adaptability across industries.
- Upward Skills Mobility: Indicates an occupation's potential for advancement.

-     o   Job Stability: Measures an occupation's resilience and likelihood of offering full-time hours and benefits.
-     o   Skill Change: Measures how "disrupted" an occupation is due to technological advancement and changing skills.

- **DWD's Work-Based Learning and Apprenticeship (WBLA) Program** coordinates efforts with the U.S. Department of Labor to develop and implement comprehensive work-based learning programs for youth and adults. As of February 2026, Indiana has 930 federally registered apprenticeship programs in high-demand sectors, including advanced manufacturing, construction, and building trades, as well as emerging sectors like cybersecurity and IT. DWD's WBLA Program also coordinates a network of partners that support and impact work-based learning programs and has managed more than $9.6 million in U.S. Department of Labor funding since its inception. Since 2018, Indiana has ranked, on average, in the Top 6 for the number of total apprentices, new apprentices, and completions among all states and territories. In fact, Indiana has ranked as high as #2 for both new apprentices and completions and is currently the #1 state for number of apprentices per capita.

- **Work and Learn Indiana** is a program that acts as a bridge connecting employers, learners, and educational institutions. It offers a user-friendly database, matching system, and reporting tools, along with valuable resources and expert guidance to support and empower Hoosiers to explore and pursue enriching work-based learning programs. *Work and Learn Indiana* is led by the Institute of Workforce Excellence, a subsidiary of the Indiana Chamber of Commerce.

- **Comprehensive Employer Consulting, Skills Training & Career Development Hub** – Established in 2018, Ivy+ Career Link operates workforce partnership and student support teams on each of Ivy Tech Community College's 19 statewide campuses. Each campus department is staffed with Executive Directors, Employer Consultants, Talent Connection Managers, Career Coaches and more. Career Link teams aligned Skills-Based hiring supports and training that enables employers to match with interested students and/or to develop incumbent training strategies to promote staff retention and advancement. Key employer partnerships at scale include collaborations with Lippert Components in South – Elkhart and Fort Wayne regions, Allison Transmission in the Indianapolis region, the TASUS Corporation in the Bloomington region and many more.

- **Industry 4.0** is a term used to acknowledge the fourth industrial revolution in advanced manufacturing and logistics (AML), signifying the adoption of machine learning, cloud computing, AI, and "smart" systems that refine and optimize processes. Conexus Indiana is working with Hoosier manufacturers to support their workforce and be a global leader in AML. Through its *Catapult Indiana* program, Conexus Indiana provides students with the opportunity to explore real-world programs in the AML sector. During the 160-hour programs, participants learn about and prepare for new careers through classroom work

and hands-on simulations. Catapult Indiana is available to unemployed, underemployed adults and high school students. In addition, Ivy Tech Community College successfully developed and scaled **Smart Manufacturing & Digital Integration** non-degree and degree programs statewide, utilizing several best-in-class 3rd-party industry recognized credentialing entities such as the Smart Automation Credentialing Alliance and more. In addition to offering short-term certificates and associate degrees in SMDI, Ivy+ Career Link departments also offer custom contract training programs to manufacturing employer partners ranging from robotics training, Programmable Logic Controls (PLC) training to even vendor specific robotic training on equipment types such as Allen Bradley, Fanuc and more.

- **Modern Apprenticeship** (MAP) is a three year-program designed to prepare Central Indiana high school students for the workforce with paid, hands-on experience that complements their traditional coursework. Apprentices begin their journey in their junior year and pursue jobs in growing fields, such as business, advanced manufacturing, and IT, propelling them on a pathway to continue their skill development either through postsecondary education or directly in the workforce. MAP is spearheaded by EmployIndy in partnership with Talent Bound and Ascend Indiana.

- The Indiana Department of Education (IIDOE) is partnering with educators and schools across the state to implement ***Indiana's Priorities for STEM Education*** in an effort to integrate science, technology, engineering, and mathematics through an engaging and motivating, student-centered pedagogy and curriculum. Students are engaged in solving real-world problems using inquiry-based learning, problem-based learning, and engineering design practices, which require critical thinking and collaboration. Integrated STEM Frameworks, or pathways, are available to students K-12.

- **Rethinking High School** In 2023, HEA 1002 included provision for $5,000 student Career Scholarship Accounts (CSA) to reduce work-related barriers for increased participation in work-based learning and training to promote career preparation during high school. CSAs via HEA 1002 help provide monetary support for career coaching, dual enrollment costs, transportation to/from work and other barriers that might prevent a student from working. Indiana already has a requirement that students show "demonstrable employability skills" as a graduation pathway standard to graduate from high school, but new requirements will be more work and skills focused. The CSA Program will also cover costs associated with enrolling in and attending IIDOE-approved course sequences and career courses and programs of study leading to industry recognized credentials. Ultimately, IIDOE can limit approval to course sequences and programs of study that culminate in a "credential of value" to ensure the programs are tailored to increase access to credentials of value rather than increase access to credentials generally. HEA 1002 will help shape a career navigation network, with the establishment of approved intermediaries. These intermediaries will meet with students and select individuals for thirty minutes to provide early career information, help establish job connections and advise on industry jobs, demand and training requirements.

Sector Partnerships

Indiana has a long history of coordination and cooperation among industry and workforce partners to meet the needs of employers, workers, and jobseekers. Building on this foundation, the state is taking deliberate steps to strengthen the connection between workforce development and economic development to ensure Indiana remains competitive in a rapidly evolving economy.

Through Indiana's Office of Commerce, DWD collaborates closely with the Indiana Economic Development Corporation (IEDC) to align talent strategies with business growth initiatives. This partnership ensures that workforce programs are not only responsive to current employer needs but also proactively support emerging industries and high-growth sectors identified by IEDC.

By integrating labor market intelligence, education and training resources, and employer engagement efforts into economic development planning, Indiana's intention is to create a unified approach that accelerates business attraction, expansion, and retention while preparing Hoosiers for quality careers.

Examples of this collaboration include joint efforts to strengthen talent pipelines in key industry sectors such as advanced manufacturing, life sciences, technology, and logistics. Additionally, Indiana is prioritizing the childcare workforce as a critical sector, recognizing that access to affordable, high-quality childcare is essential for enabling workforce participation and attracting businesses to the state. By investing in training and credentialing for childcare professionals and aligning these efforts with economic development strategies, Indiana addresses both a workforce development challenge and a business competitiveness issue.

2. *Describe the strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available to the State to achieve fully integrated customer services consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities in regard to weaknesses identified in section II(a)(2).*

GOAL 1: PREPARE FUTURE SKILLED WORKERS AND UPSKILL INCUMBENT WORKERS

ATS Alignment: Industry-driven strategies; Worker Mobility

Strategy 1(a): Incumbent Worker Training

Indiana will continue focusing on the training and development of incumbent workers to enhance their skills and productivity and support the needs of Hoosier employers. Key programs include Power Up Indiana and registered apprenticeships and pre-apprenticeships. DWD's focus on these areas aims to address lower enrollment in post-secondary education and training programs through connection of Hoosiers and Hoosier employers to these programs.

Strategy 1(a): Milestones/Success Measures

Milestones	Success Measures
Implement Apprenticeship Expansion Strategic Plan	• Increase in active and new apprentices • Increase Registered Apprenticeship Program (RAP) and pre-RAP participants in Advanced Manufacturing and Education • Establish Registered Apprenticeship Hubs for Advanced Manufacturing and Education
Develop upskilling grant strategy	• Monitor funding expenditures • Explore incumbent worker training waivers
Implement "Power Up Indiana" upskilling program	• Build/strengthen employer partnerships • Increase number of upskilling programs • Increase number of upskilling participants • Wage increases

Indiana's focus on incumbent worker training (IWT) will be designed to strengthen the state's workforce by scaling RAPs and pre-RAPs, increasing investments in existing IWT programs, and leveraging innovative approaches, including waivers, to upskill workers. The new Power Up Indiana initiative will further enhance upskilling opportunities, connecting workers to in-demand careers.

DWD Work-Based Learning and Apprenticeship will continue to advance strategies under the Apprenticeship Expansion Strategic Plan, deepening engagement with employers, training providers, and partners to grow high-quality registered apprenticeship pathways. Over the past year, Indiana secured $6,251,973 in federal funds through State Apprenticeship Expansion Grants (SAE Base and Competitive) to support the expansion and modernization of RAPs across the state. This includes base formula funding to bolster existing apprenticeship infrastructure and competitive funding to launch new apprenticeship models and reduce barriers for employers. These resources will enhance Indiana's apprenticeship ecosystem, accelerate outreach to industry partners and enhance the pipeline of workers equipped for in-demand careers.

Power Up Indiana is a new program driven by Indiana's Office of Commerce that catalyzes change in employer practices by supporting those who invest in upskilling their existing workforce. It recognizes and rewards companies that train, retain, and advance talent from within—and builds a culture of lifelong learning across the state. The purpose of Power Up is to:

- Celebrate companies already leading in upskilling.
- Shift Indiana's economic development focus toward talent capacity.
- Equip more employers to do the same through clear incentives and accessible tools.
- Strengthen regional and sector-based partnerships that can scale impact statewide.

Additionally, DWD is exploring IWT-related waivers under WIOA to provide additional flexibility for employers and training providers. Potential waiver strategies may include increasing allowable expenditure thresholds for IWT, expanding eligibility parameters to support small and mid-sized businesses, and streamlining administrative requirements to accelerate training delivery. These

flexibilities would allow Indiana to scale employer-driven upskilling more rapidly, respond to regional workforce needs, and maximize federal investments in high-demand industries.

Together, these efforts will aim to remove barriers to participation, expand access to training for incumbent workers and strengthen employer engagement across the state.

Strategy 1(b): Occupational Skills Training

This priority focuses on the reach of occupational skills training and aims to address limited awareness of workforce system activities and services. Key programs include Adult Education, Workforce Ready Grant (WRG), and data tools such as Pivot, Top Jobs Indiana, and Credentials of Value.

Strategy 1(b): Milestones/Success Measures

Milestones	Success Measures
Workforce Ready Grant strategy	• Increase WRG credentials
Elevate AE program awareness	• Increase AE pre-RAP partnerships • Increase WEI/IET participants • Meet or exceed AE Q2 and Q4 employment and wages post-exit metrics • Align credentials with field of employment • Increase % participants w/ wage increase post-training (WRG)
Increase HSE attainment through policy revisions	• Increase number of HSEs earned
Implement Top Jobs and Credentials of Value	• Increase % of UI claimants who explore a job via Pivot • Wage increases from Pivot recommended jobs

Increased employment and wage gains are state priorities and remain at the forefront of state workforce activities. Indiana has been able to connect both higher wages and a greater likelihood of employment with short-term career certification training, entry into pre-apprenticeships, and foundational education credentials, such as the high school equivalency diploma. While employment and wage gain data demonstrate overall gains in wage and employment for adults who complete industry recognized credentials, Indiana plans to conduct further analysis to better understand these data points in relation to specific industries and credentials. By leveraging internal resources around quarterly employment metrics, Indiana will ensure state resources and funding are committed to activities providing strong outcomes for Hoosier adults.

Strategy 1(c): Quality Employment Services

Building upon strides made through the Employment Services Innovation (ESI) project, Indiana will continue to refine employment services. DWD now oversees Wagner Peyser (WP) employment services and RESEA services in all local workforce development areas and is working to streamline

the referral process between Wagner Peyser and Title I. Service efforts are focused on addressing barriers to alignment and integration across programs and systems.

Strategy 1(c): Milestones/Success Measures

Milestones	Success Measures
Develop/implement virtual service delivery model	
Enhance existing customer feedback mechanisms and create new feedback loops	• Baseline service delivery volume and activity • Number of quality employment services provided • Reduce Failure to Participate (FTP) Rate/Number • Meet/exceed WP Q2 and Q4 Employment metrics • Meet/exceed WP Median Earnings metrics
Staff development in use of LMI and advising clients	
Implement WP operations dashboard	
Streamline referral process between WP/ES and Title I.	• Clear process developed and implemented.

Indiana's Employment Services strategy centers on delivering high-quality, timely employment services that help job seekers secure meaningful work and employers to access skilled talent. Building on the progress of the Employment Services Innovation (ESI) project, we are refining and modernizing service delivery, both in-person and virtual, while working to ensure alignment across all WIOA Title programs. A key priority is engaging job seekers sooner in their unemployment journey, so they receive support before barriers deepen and opportunities are missed.

To achieve this outcome, we will focus our efforts over the next year will be on streamlining referrals and strengthening partnerships between programs, creating a clear, efficient process that ensures individuals quickly access the right mix of services. This collaboration is critical for reducing duplication, maximizing resources, and improving outcomes across the system.

Our success will be measured by increased service delivery volume, reduced Failure to Participate (FTP) rates, and improved employment and earnings metrics. We are implementing tools like operations dashboards, enhancing customer feedback loops, and equipping staff with labor market insights to better advise clients. Ultimately, our goal is an integrated, proactive system where early engagement and strong program alignment drive better results for job seekers and employers alike.

GOAL 2: IMPROVE SYSTEM EFFICIENCY AND SIMPLIFY SERVICE DELIVERY

ATS Alignment: Integrated Systems; Accountability; Flexibility and Innovation

Strategy 2(a): Workforce System Structure and Governance

Indiana will implement directives summarized in Executive Order 25-45 (standardizing economic and workforce development regions) and 25-77 (State Workforce Development Board

reconstitution). Realignment aims to reduce duplication and increase efficiency, allowing Indiana to prioritize investments and resources capitalizing on the distinct regional strengths across the State. The State Workforce Development Board (SWDB), reconstituted pursuant to WIOA requirements, will ensure Indiana has a well-rounded strategy to prepare Indiana's workforce for effective participation in the competitive and global economy.

Strategy 2(a): Milestones/Success Measures

Milestones	Success Measures
Implement workforce region and local area realignment	• Transition framework and timeline established • Timely achievement of progress markers (e.g., new boards seated; elected officials and local board members trained) • Local area boundaries finalized and officially designated • Governance documents, contracts, grants, and agreements developed or transferred • State systems, processes, and policies are updated • System ready for funding allocations under new model
Reconstitute the SWDB in alignment with WIOA requirements	• WIOA-compliant SWDB structure • Members trained • Governance documents developed and adopted • Meetings routinely held

Through region and local area realignment, along with reconstitution of the SWDB, Indiana will strengthen the workforce development foundation statewide.

Realignment will establish new Workforce Development Region boundaries that align with Indiana's official economic planning region boundaries (READI), ensuring that workforce planning and economic development strategies are closely coordinated. By creating these coinciding boundaries, the State will facilitate more seamless collaboration between regional workforce entities, local economic development organizations, and key stakeholders, including employers, education providers, community partners, and job seekers. This structure will also enhance Indiana's ability to respond to local labor market demands efficiently, targeting both immediate and long-term workforce needs. Realignment will also result in new local workforce development area (LWDA) boundaries, which will allow local workforce boards to better identify high-demand sectors, tailor skills development initiatives, and optimize the use of both federal and state funding resources. Businesses will gain a clear point of contact for talent pipeline initiatives, while jobseekers will benefit from programs that are aligned with regional economic priorities.

The reconstituted SWDB will strengthen governance and strategic oversight of workforce programs with a renewed emphasis on the WIOA framework. The SWDB will provide statewide leadership and accountability, guiding the alignment of programs across WIOA Titles I – IV, including Title I Adult, Dislocated Worker, and Youth Service across Indiana's newly defined regions and local areas. The SWDB will also serve as a critical conduit for connecting local strategies with federal and state requirements, facilitating collaboration across regions and streamlining communication between the Governor's office, local workforce boards and local stakeholders.

Together, this realignment along with SWDB reconstitution will allow Indiana to take a more integrated, strategic approach to workforce development by ensuring regions can respond to immediate labor market needs while cultivating a sustainable talent pipeline that will support long-term economic growth and maximize state workforce investments.

Strategy 2(b): Efficient and Innovative Service Delivery

Indiana will improve its workforce administrative framework to increase system efficiency, enhance accountability, and simplify service delivery. As part of broader realignment efforts, the State will review internal structures, decision-making processes, and oversight functions to reduce duplication, clarify responsibilities, and better align fiscal and program operations with strategic workforce priorities. Improvements will be designed to support consistent, high-quality service delivery, and to promote data-informed, strategic decision-making.

This approach will emphasize integrated governance, standardized grant administration, and coordinated oversight as core elements of effective service delivery. By streamlining existing processes, boosting cross-program alignment, and building internal capacity, Indiana will decrease unnecessary complexity while preserving local flexibility to respond to regional labor market needs. Targeted innovations – including process improvements, service integration, and technology enabled solutions – will help to improve participant experience, accelerate engagement and ensure workforce investments are deployed efficiently and sustainability.

Strategy 2(b): Milestones/Success Measures

Milestones	Success Measures
Evaluate waiver flexibilities	• Waiver requests developed and submitted (e.g., traditional and Workflex Waiver Plan)
Standardize grant development and management processes	• Regular observation and routine oversight practices are established. • Timely guidance and technical assistance provided to grantees. • Sub-grantee performance expectations are clear and consistent, proactive accountability structures are developed.
Enhance cross program coordination across WIOA Core Programs	• Regular coordination occurs through meetings and documented strategies. • Opportunities are identified for smoother participant experiences and transitions.
Technology enables services	• Streamlined technology systems across program service delivery
Pilot innovative service delivery models and analyze AJC (WorkOne) Structure	• Traditional AJC service delivery reviewed, alternative approaches (e.g. virtual service delivery) tested and evaluated for expansion.

These coordinated efforts will focus on improving everyday program oversight, building stronger cross-team connections and using operational and performance data to guide strategic decision-

making. Standarized grant development and management processes will improve local administration and subgrantee performance, shared service approaches for intake and eligibility will reduce duplication and improve participant access and increases coordination across Titles to support smoother participant transitions.

Indiana will also explore innovative service delivery approaches, including examining the traditional brick-and-mortar structure of the AJCs (WorkOnes) and piloting virtual or alternative models. Lessons learned will inform broader implementation where appropriate, supporting continuous improvement and long-term sustainability of the workforce system.

Together, these actions will create a more connected, responsive and data-informed workforce system that streamlines service delivery, strengthens oversight, and supports staff and participants in achieving impactful outcomes.

III. Operational Planning Elements

The Unified or Combined State Plan must include an Operational Planning Elements section that supports the State's strategy and the system-wide vision described in Section II(c) above. Unless otherwise noted, all Operational Planning Elements apply to Combined State Plan partner programs included in the plan as well as to core programs. This section must include-

A. State Strategy Implementation

The Unified or Combined State Plan must include-

1. ***State Board Functions****: Describe how the State board will implement its functions under section 101(d) of WIOA (i.e., provide a description of Board operational structures and decision-making processes to ensure such functions are carried out).*

The State Workforce Development Board (SWDB), reconstituted by Executive Order 25-77, replaces the Governor's Workforce Cabinet (GWC), which was dissolved by legislation effective July 1, 2025. Indiana has been working to reconstitute the SWDB since that time. DWD, as the administering agency of the SWDB, and in alignment with Executive Order 25-77, completed the initial solicitation process to collect nominees for SWDB reconstitution. As of mid-February 2026, the nominee list is under review in preparation for the Governor's official member appointment determinations, anticipated to occur during February-March 2026. The proposed nominee list prioritizes required membership categories and minimum seats to expedite initial reconstitution of the SWDB. As nominees were solicited in accordance with WIOA membership requirements, Indiana will not be seeking to renew the previously approved structural waiver upon its June 2026 expiration. Membership will instead align with WIOA regulations (20 CFR 679.110). Following official SWDB appointments and designation of a SWDB Chair, DWD will coordinate the first meeting, with regular meetings likely thereafter. Initial SWDB activities will involve member training, establishment of bylaws, and creation of an Executive Committee. Additional committees may be established as the SWDB operations are further underway. These activities will well position the new SWDB to carry out its regulatory functions pursuant to 20 CFR 679.130.

The SWDB will be business led and comprised of leaders from business, workforce, state and local government, and lawmakers who represent key industries and programs throughout the state. Members of the SWDB are appointed by the Governor with terms staggered to ensure only a portion of membership expires in a given year. If necessary, the Governor will make an appointment to fill any vacancy on the SWDB, but only for the duration of the unexpired term.

The SWDB, similar to its predecessor GWC, is driven by its mission to ensure the workforce development system helps grow the State's economy. The SWDB will meet to discuss key workforce initiatives, strategies, opportunities, and challenges occurring in the State. As the predecessor

GWC intentionally convened its meetings in communities throughout the State, hosted by a workforce partner, SWDB leadership will evaluate the value in continuing that practice vs. holding meetings in a single location (e.g., Indianapolis).

Although the Governor has primary authority in WIOA local area governance, both the SWDB and Indiana Department of Workforce Development (DWD) have approval and signatory authority on behalf of the Governor for various WIOA local area governance activities. For local area governance activities requiring Governor-level approval:

- If activities are specifically outlined within U.S. Department of Labor regulation or guidance as State Board functions, the SWDB is authorized to approve/sign on behalf of the Governor (e.g., WIOA Local Plan approvals, Designation of Local Workforce Development Areas, etc.).

- If activities are operational or compliance-based, the DWD Commissioner is authorized to approve/sign on behalf of the Governor. DWD will issue guidance on, review, and make decisions regarding these activities, consulting with the SWDB as appropriate (e.g., WIOA Single Entity/Multiple Role structures, local WDB certifications, submission of bi-annual Nondiscrimination Plan, etc.).

- For any activities that may overlap the above designations of signatory authority, the SWDB and DWD collaborate and EITHER may approve/sign on behalf of the Governor. For example, the review process for Local Plans is conducted by DWD, with a recommendation provided to the SWDB for final approval. Written approval may then be signed/issued by DWD, on behalf of the SWDB, or may be issued directly from the SWDB.

2. *__Implementation of State Strategy__. Describe how the lead State agency with responsibility for the administration of each core program or a Combined Plan partner program included in this plan will implement the State's Strategies identified in Section II(c). above. This must include a description of-*
   A. ***Core Program Activities to Implement the State's Strategy****: Describe the activities the entities carrying out the respective core programs will fund to implement the State's strategies. Also, describe how such activities will be aligned across the core programs and Combined State Plan partner programs included in this plan and among the entities administering the programs, including using co-enrollment and other strategies, as appropriate.*

In alignment with the goals and strategies outlined in Section II.B., as well as the five pillars of America's Talent Strategy, Indiana has identified specific action steps where core and partner programs play a significant role in achieving successful outcomes.

Indiana Department of Workforce Development (DWD)

DWD oversees five of the six WIOA core programs: Adult, Dislocated Worker, Youth, Adult Education & Family Literacy, and Employment Service/Wagner Peyser. As such, DWD will have a lead role in implementing Indiana's strategic vision. In 2025, DWD established new agency goals and Workforce Operations objectives for Fiscal Years 2026 - 2029 that align with the Goals set forth in this Plan. DWD will continue to fund core program required activities and will strategically design complementary activities from a variety of funding streams to carry out or support the Plan's key action steps.

DWD prioritizes alignment across partners, programs, and funding streams. DWD will continue to emphasize the importance of such alignment in the implementation of the State's workforce development strategies. The examples below exhibit this alignment, both in current projects and in projects that will be operationalized under this Plan.

As discussed in II.b.:

QUEST Dislocated Worker Grant. DWD was awarded $10.8M in Quality Jobs, Equity, Strategy, and Training (QUEST) Dislocated Worker Grant funding in 2022. DWD utilized this funding to support multiple initiatives, including:

- Development and implementation of the Workforce Recommendation Engine (WRE, now known as Pivot)

- Piloting an alternative funding strategy for participant enrollment to support improved outcomes related to co-enrollment between Title I and Title II programs

- Partnerships outside of WIOA Core to ensure successful outreach and marketing

- Focus on building pathways and engaging participants and employers in priority industries, such as infrastructure and the care economy

Indiana's work with the QUEST DWG demonstrates effective cross-collaboration between multiple programs and partners, including Title I, Title II, Unemployment Insurance, local workforce development areas (LWDAs), and employers.

DWD's QUEST DWG is fully closed out and will no longer be an active funding source during this two-year plan modification period. Activities supported under QUEST DWG were concluded in accordance with federal requirements. Strategies previously advanced through QUEST may continue to inform the state's broader approach to serving dislocated workers, including sector-based training, employer-aligned skill development, and pathways to credential attainment and are now supported through other available WIOA and state workforce resources.

Systems Alignment and Integration. DWD has made significant strides in aligning and integrating systems to improve efficiency and enhance customer experience. One of the most impactful achievements has been the consolidation of multiple smaller program systems into our primary case management platform, Indiana Career Connect, powered by Geo Solutions. This integration now includes virtual engagement tools, the Work Opportunity Tax Credit (WOTC) program, and apprenticeship tracking, creating a more unified and streamlined system.

Looking ahead, Indiana will continue prioritizing system alignment with a strong focus on efficiency and user experience. Over the next year, we plan to further integrate Reemployment Services and Eligibility Assessment (RESEA) programming into Indiana Career Connect. These efforts aim to:

- Create operational efficiencies by reducing redundancies and simplifying workflows.

- Enhance customer experience through a single, user-friendly platform for accessing workforce services and job search.

- Improve data sharing and reporting to support better decision-making and program outcomes.

By leveraging technology and consolidating systems, DWD is building a more connected, responsive, and effective workforce development infrastructure that meets the needs of Hoosiers and employers alike.

Removing Barriers. Through coordination of funding streams, alignment in service delivery, and targeted use of funds, DWD will support the State's goals in removing barriers for workers. Indiana Adult Education, for example, now covers high school equivalency (HSE) testing fees for students enrolled in adult education programs, eliminating the barrier HSE testing fees impose on adult learners. This began as a pilot project during the pandemic in PY 2020. The response was so great that it was, and will be, continued in subsequent years using the non-match State adult education allocation, exhibiting coordination between Federal and State funding through complementary service approaches. The *Workforce Education Initiative* (WEI) is another example of continuing coordination and alignment. Many individuals who need adult education services must make the difficult choice between earning an income and returning to school. Through WEI, funding is made available to adult education providers to offer classes at employer work sites.

Work-Based Learning and Apprenticeship. DWD will continue to align initiatives to address employer talent needs and develop career pathways for workers in high growth sectors through continued Power Up and WRG funding opportunities. DWD will continue to encourage the use of Power Up funds toward Certified Pre-Apprenticeship (PRAP), and Registered Apprenticeship (RAP) programs. These models create a training system based on employer needs that prepares a skilled workforce for career pathways in high growth sectors. The DWD Work-Based Learning and Apprenticeships will also continue coordination of a partner network that supports and provides work-based learning programs, amplifying the impact of the workforce system through strategic collaboration and marketing. DWD manages and implements U.S. Department of Labor apprenticeship funding. Through this funding, DWD provides resources and encourages co-

enrollment and braided funding opportunities to serve more individuals as they enter strong career pathways.

DWD will continue to align initiatives to meet employer talent needs and strengthen career pathways in high-growth sectors through ongoing Power Up and WRG funding. DWD will encourage the use of Power Up funds to support Certified Pre-Apprenticeship (PRAP), and Registered Apprenticeship (RAP) programs—employer-driven models that prepare a skilled workforce aligned to industry demand.

DWD Work-Based Learning and Apprenticeship will continue to coordinate a statewide partner network that supports and expands work-based learning programs, amplifying the impact of the workforce system through strategic collaboration and marketing. The office also manages and implements U.S. Department of Labor apprenticeship funding and uses these resources to promote co-enrollment and braided funding strategies, enabling more individuals to access high-quality career pathways.

Vocational Rehabilitation Services (VR)

In partnership with DWD, FSSA will continue to enhance collaboration opportunities to improve employment outcomes for Hoosiers with disabilities. Through the VR program, collaboration at the local and statewide level will continue through VR team member participation on local workforce boards, collaboration on education and outreach events such as with local businesses and schools, and ongoing opportunities for cross-training opportunities as well as continued co-location around the state. Several VR initiatives – including provider performance incentive payments implemented in July 2023 and a shift in VR Counselor roles to identify dedicated VR Counselors to work with participants enrolled in postsecondary training – align directly with strategies outlined in this plan. Several goals and strategies outlined in the VR section of the State Plan are strategically aligned with overall goals and strategies (e.g., increasing work based learning opportunities and credential attainment, and improvement to pre-ETS).

> B. ***Alignment With Activities Outside of the Plan****: Describe how the activities identified in (A) will be aligned with programs and activities provided by required one-stop partners and other optional one-stop partners and activities provided under employment, training (including Registered Apprenticeships), education (including career and technical education), human services and other programs not covered by the plan, as appropriate, assuring coordination of, and avoiding duplication among these activities.*

Indiana has a talent development system comprised of wide-ranging and broad workforce development and education programs spanning Federal acts, State initiatives, and private investments. This has been beneficial for Hoosiers and Indiana employers, as there are multiple resources and supports available. Indiana will leverage work being done by and between our Core, required, and optional partners to drive our initiatives and coordinate alignment of new projects among partners.

Indiana recognizes that coordinated alignment among partners and activities is vital to ensuring an effective workforce system where activities are not duplicated. As a primary convener of Indiana's workforce system, the SWDB will drive collaboration and alignment among and across the State agencies and key stakeholders involved in carrying out the activities identified in this Plan. DWD and FSSA (i.e., VR), as the entities administering the core programs, will assist in cascading the Plan's goals, strategies, and action steps to their own partners, including partners within the LWDAs. Alignment will be achieved through a variety of strategies requiring cross-program and cross-partner collaboration, including:

- Cross-training

- Strategic co-enrollment

- Co-location

- Data sharing

- Cohesive outreach and engagement with individuals and employers

Several of the activities listed in III.a.2.A., along with the goals and strategies identified in Section II.b., involve significant alignment across a variety of partners and key stakeholders. Some examples include:

Pivot (previously known as the Workforce Recommendation Engine or WRE): Coordination among workforce partners is vital for the effectiveness of Pivot. Pivot leverages data the State already collects during daily governance activity to better serve workers. The goal is to use data in an algorithm to identify training programs and career pathways that align with an individual's educational and work background and desired future state (e.g., increased wages, length of training, cost of training, distance willing to travel for training, etc.) rather than asking citizens to take an assessment to provide us with this data. By streamlining this approach, Indiana hopes to reduce duplication of services among program partners and make coordinated recommendations using technology and data from unemployment insurance administrative records.

Digital Readiness: Alignment across partners and activities outside the Plan is also a necessary component for the State's digital readiness goals and strategies. As noted earlier, for example, Title II already has WIN as a resource available within DWD and LWDAs. Some LWDAs also have separate digital literacy tools to assess and assist their customers. In the space of digital literacy and readiness, it is important that Indiana's partners are mindful of current projects and efforts to determine where activities could be expanded or aligned.

High School Equivalency (HSE) Testing: To eliminate the barrier HSE testing fees impose on adult learners, Indiana Adult Education now covers HSE testing fees for students enrolled in adult education programs. This began as a pilot project during the pandemic in PY 20. The response was so great that it was continued in subsequent years using the non-match State adult education allocation. Efforts to remove this barrier for adult learners exhibit coordination between Federal and State funding through complementary service approaches.

Work-Based Learning (WBL) and Apprenticeship: Multiple partners are involved in successfully implementing WBL and apprenticeship throughout Indiana. DWD Work-Based Learning and Apprenticeships, for example, drives initiatives such as providing education and training to one-stop business service professionals and providing guidance and tools to assist with apprenticeship creation. Career coaches, counselors, and others involved in case management can access DWD training and resources to determine individual needs and offer WBL options and capture data and outcomes. Further, as DWD is the recipient of both WIOA Core Program funding and U.S. Department of Labor apprenticeship funds, strategies are aligned across programs and partners to encourage co-enrollment and provide funds for on-the-job training (OJT), related technical instruction (RTI), as well as to address supportive service needs.

Multiple partners contribute to the successful implementation of work-based learning (WBL) and apprenticeship across Indiana. DWD Work-Based Learning and Apprenticeship leads these efforts by providing education and training for one-stop business service professionals and offering guidance and tools to support apprenticeship development. Career coaches, counselors, and case management staff can access DWD training and resources to assess individual needs, connect participants to appropriate WBL options, and capture participation and outcome data.

As the recipient of both WIOA Core Program funding and U.S. Department of Labor apprenticeship funds, DWD aligns strategies across programs and partners to promote co-enrollment, support on-the-job training (OJT) and related technical instruction (RTI), and address participants' supportive service needs.

C. ***Coordination, Alignment, and Provision of Services to Individuals****: Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services (e.g. transportation), to individuals, including those populations identified in section II(a)(1)(B), and individuals in remote areas. The activities described shall conform to the statutory requirements of each program.*

High quality service delivery is implemented through various coordination and alignment activities among Indiana's WIOA Core and Partner programs. Through Indiana's workforce system partners, individuals have access to an array of customizable services, designed to meet them where they are according to their eligibility, needs, training, and/or employment goals.

Local Operations: A foundational component for ensuring coordination and alignment in service delivery starts at the local level. Each local workforce development area (LWDA) drives development and implementation of partner memorandums of understanding (MOUs) and infrastructure funding agreements (IFAs). MOUs are the avenue for local system partners to outline their collective vision for the one-stop system and commit to partnership under that vision. IFAs

further solidify those partnerships through development of negotiated budgets describing each partner's financial share of system costs. Each comprehensive and affiliate WorkOne center (Indiana's term for 'American Job Centers') is certified every three years via a thorough review process. These center certifications provide an additional layer of assurance for successful system operations on an office-by-office basis.

Service Navigation: Although Indiana's talent development system includes a broad range of programs and partners offering resources and opportunity for Hoosiers, it is vital that the system be navigable for those it serves. Ideally, there should be no wrong door for individuals to enter the system and receive customized services. Further cross-training of staff, increased and streamlined referrals, and co-location of partner staff, where feasible, will not only reduce potential duplication of services, but will also increase funding efficiency. Ultimately, these strategies will assist with a holistic view of individuals' needs.

When an individual connects with Indiana's workforce system, they are triaged to determine service level needs. Whether accessing self-services or seeking more in-depth assistance, and whether engaging virtually or in-person, individuals are met upfront with next steps. Veterans and eligible spouses are given service priority, and, when connecting to Title I Adult services, Adult Priority of Service provisions are implemented as appropriate.

Accessibility: Staff are trained to use multiple tools and resources to ensure accessibility to services when serving clients on-site. WorkOne offices, as well as DWD and LWDA websites and virtual service options, prioritize language, programmatic, and physical accessibility, with Equal Opportunity (EO) notices and related information prominently posted for Title I financially assisted programs and services. Indiana's WIOA State EO Officer and the LWDA Local EO Officers routinely educate and train staff regarding nondiscrimination provisions. Further, DWD and Vocational Rehabilitation Services (VR) have partnered on several occasions to cross-train staff on multiple disability-related topics. Most recently, DWD and VR, in partnership with U.S. Department of Labor, acquired a Learning Management System (LMS) to support cross agency training. Two modules have since been developed and successfully rolled out to staff focusing on workforce collaboration and integration: (1) Co-enrollment and Joint Case Management and (2) Indiana's Workforce System and WIOA Program Partners. DWD and VR also collaborated to pilot VR Navigators, who served as liaisons between WorkOne AJCs, VR staff, and shared customers.

Cross-training: Indiana will explore additional opportunities for cross-training among partners and programs to boost awareness and familiarity with program offerings and will encourage staff co-location when feasible. These strategies will support the State's goals by removing barriers for workers through enhancing referral processes and boosting co-enrollments. One of the State's goals is to develop a cross-system referral process for individuals with barriers to employment. To do this, partners must analyze current referral processes and collaborate to determine where efficiencies can be gained while working toward a consistent, more uniform process for cross-system referrals.

Co-enrollment: Similarly, co-enrollment will be emphasized across programs. Strategic co-enrollment is customer-centered and should be driven by the individual's unique barriers to employment. With adequate cross-training, staff will have the knowledge needed to review options with individuals and offer enrollment recommendations based on any programs for which the individual is eligible. Indiana's co-enrollment approach facilitates service delivery alignment and encourages braiding of resources to address the training and employment needs of jobseekers and business customers at the local level. Expanding co-enrollment efforts will help to maximize each program's efficiency and impact. Serving individuals through the programs most appropriate for their needs can reduce duplication of services, improve outcomes, and increase the number of participants that can be served through each funding stream.

Supportive Services: As individuals are enrolled in various programs, staff assess supportive service needs, and for co-enrolled participants, identify which program will fund supportive services. To effectively serve each individual and mitigate their barriers, staff document barriers and supportive services in participant files. Title I Adult and Dislocated Worker supportive services, as an example, must include file documentation of barriers, the plan for addressing those barriers, and information demonstrating need for any supportive services rendered. LWDAs have flexibility to establish limits on supportive services amounts and timeframes, so long as the services are reasonable and necessary.

Co-location: Staff co-location, when feasible, is another opportunity to reduce barriers for those accessing State services. Strategically locating staff will facilitate referrals and increase awareness and partnership among various programs. Whether this be through physical sharing of space or from partner staff presence on certain days and times in certain locations, through mobile services, or otherwise, co-location serves to increase variety and flexibility as to where, when, and how an individual can connect with our programs. Co-location also facilitates real-time information sharing, allowing staff to better align activities, leverage existing resources, and increase opportunities for collective innovation that may lead to better service delivery approaches.

Workforce Education Initiative (WEI): Another strategy in meeting individuals where they are is the WEI. Many individuals who need adult education services must make the difficult choice between earning an income and returning to school. Through WEI, funding is made available to adult education providers to offer classes at employer work sites. Last year adult education programming was offered in partnership with nearly 200 employers serving close to 3,500 students. These classes varied in form and included HSE prep, English Language Acquisition, and Integrated Education Training. Each curriculum was developed in partnership with and to meet employer needs. Offering classes at employer work sites also assists in reducing transportation concerns. When classes can be scheduled in alignment with an individual's work schedule, it reduces the need to arrange transportation to multiple locations.

Virtual Client Engagement: Indiana has made several tools available to virtually engage with individuals seeking services. For example, adult education and English as a Second Language (ESL)

programming are fully available online. DWD staff utilize Indiana Career Connect to schedule appointments, participate in meetings, transmit and sign documents, and track their engagements. This technology allows staff to deliver services virtually without a client necessarily needing to step foot into a One-Stop center. These tools are critical to engaging Hoosiers in this new workforce climate. Indiana continues to assess and evaluate these tools and their effectiveness with a focus on investment in tools that are maximizing engagement and connectivity with One-Stop Centers.

D. **_Coordination, Alignment, and Provision of Services to Employers:_** _Describe how the entities carrying out the respective core programs, any Combined State Plan partner program included in this plan, required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs and to achieve the goals of industry or sector partners in the state. The activities described shall conform to the statutory requirements of each program._

To create a more robust talent development system and advance Hoosiers toward economic mobility, Indiana must continue to foster action-oriented relationships between businesses, community partners, and government agencies. Indiana will continue to attract and support businesses of all sizes to our State. Our focus, however, is on identifying and developing the skilled workforce needed to maintain these businesses and the businesses already here. To accomplish this, we engage with businesses holistically rather than focusing solely on their current needs. We must also look for ways to expand hiring practices, access untapped populations, and develop strategic talent pipelines.

Building better connections to employers alongside our partners is a critical component of addressing the workforce challenges facing Indiana businesses. There is a need now, more than ever, to align resources and work strategically to develop talent pipelines. The following strategies outline how Indiana will continue coordinating activities and resources to provide comprehensive, high-quality services to employers to meet their current and projected workforce needs.

Indiana's talent development system must be responsive to the needs of employers, remain innovative, and provide real-time solutions to complex and pressing problems. Indiana faces a defining moment as it contemplates the future of work and the State's economy must respond to employer demand for a technically skilled, adaptable workforce. Amid a quickly evolving digital skills landscape with changing job requirements, and a limited labor market due to shifting demographics, there will be a need for a structured, unified framework for education and workforce alignment with employers regarding skills, credentials and hiring needs that will build upon existing employer engagement.

Engagement, Technical Assistance and Staff Training: Indiana will continue providing employer service-focused technical assistance and staff training through development opportunities for

State staff and partners, such as LWDA staff and local workforce development board (LWDB) members. Specific board training, as an example, has been developed and is available for LWDB members and staff to enhance knowledge, duties, and understanding of their responsibilities as to how the talent development system can connect with employers. Another example is continued evaluation of Local Veterans Employment Representative (LVER) integration with WorkOne AJC Employment / Business Services Teams (BSTs). Indiana aims to ensure that veterans are adequately represented in local employer engagement activities, with the LVER leading those efforts through advocating for all veterans for employment and training opportunities with businesses, industries, unions, and apprenticeship programs.

In 2024, VR implemented a pilot project to enhance its capacity to provide technical assistance to businesses with one of the largest counties in the State, Hamilton County. Through this partnership, Hamilton County leveraged its business networks to create more opportunities with local businesses to offer work-based learning and hiring opportunities for jobseekers with disabilities, including youth. Businesses received support with onboarding and training to promote a successful experience for both the employer and the jobseeker. VR will seek to expand this pilot opportunity in PYs 26-27 following a request for proposal process. VR aims to expand to additional communities beginning Fall, 2026 and refine targeted objectives and metrics to drive improved employment outcomes for VR participants.

While tremendous progress has been made in communication and coordination with partners, such as using technology to track and record employer engagements and activities, the landscape of workforce development has significantly changed in recent years. It is critical that Indiana reassess our coordinated employer service delivery approaches across core programs and partners. A better understanding of all resources – whether provided by WIOA core programs and offered within our WorkOnes, or through State funded programs, or via other services funded by Partner Programs – will allow State, partner, and local workforce staff to better connect resources and programs to the employers they serve in their communities. All workforce system staff and partners should be well-versed in the leading industry sectors in their region and the resources available to help employers develop the talent they need.

Economic and Employer Data: DWD Research and Analysis staff have developed regional dashboards for use by workforce and economic development partners, including the Management Performance Hub (MPH). MPH helps stakeholders identify and analyze data sets necessary to understand the intersection between education, workforce development, and social service systems. These tools are designed to increase awareness of economic and employer data with the goal of reaching a united understanding of the unique needs within each region. This data can be shared with partners across the workforce system to support the alignment of strategies and initiatives to support employers.

Current labor market analysis shows that Indiana is preparing to fill more than 4 million jobs by 2031, 154,000 of which are from growth, while 1.6 million represent labor force exits and 2.3 million from transfers. To prepare to meet this upcoming demand and secure a successful future for

Hoosiers, DWD plans to create more opportunities for discussions and joint presentations with the Indiana Economic Development Corporation (IEDC) and the Indiana Chamber of Commerce. By looking towards the future, our efforts will be focused on promoting increased dialogue and action around increasing the number of good jobs, diversifying the economy, and continuing to grow the State's global competitiveness. As a result, State and local partners will have more targeted and coordinated talent and business development strategies moving forward. The SWDB, DWD, and LWDAs will collaborate in these efforts to drive awareness and identify any workforce policy changes that may be necessary.

Training Resources for Employers: Another key strategy in Indiana is the deployment of Power Up, a funding initiative that supports employers investing in workforce training through the Next Level Jobs Program. Power Up uses a coordinated service delivery approach that brings state and local partners together to identify and respond to employer needs. Several million dollars have been invested in this skill advancement initiative, resulting in higher wages for Hoosiers and a more sustainable workforce for Indiana businesses.

Employers also benefit from the Workforce Education Initiative (WEI), as described in Section III.a.2., which delivers adult education classes directly at employer worksites. Curricula are developed in partnership with employers to address their specific workforce needs. In the past year, adult education programming was delivered in partnership with approximately 200 employers, serving nearly 3,500 adult learners.

The State of Indiana is supporting employers through our "Grow Your Own Talent" initiative and the Power Up reimbursement plays a key role in our success. Short-term, low-level business services, that have been very reactionary in nature over many years, are simply not providing the support that Hoosier businesses truly need. Taking a proactive approach and building sustainable talent pipelines through comprehensive programs will yield the individuals who have the knowledge, skills, and abilities that employers need.

Indiana is at full employment and growth now depends on the talent already on the job. Power Up Indiana repositions workforce development as a long-term business strategy. This initiative empowers employers to promote and train high-skill, high-wage jobholders, driving wage growth, leadership pipelines, and statewide prosperity. This is not a program of rewards; it's an investment in employer vision, workforce agility, and a stronger economic future for all Hoosiers.

Power Up Indiana is a direct tool to help employers advance the people already working in Indiana, those most likely to stay, grow, and lead. This initiative replaces labor attraction dependence with talent investment strategies.

Work-Based Learning: Work-based learning (WBL) remains a high priority strategy for Indiana as these activities allow our target populations to gain knowledge, skills, and experience as they earn an income, thus alleviating the education and life expenses tug-of-war that prevents individuals from pursuing educational opportunities. Seamlessly integrating the full WBL continuum into the Indiana talent development system will allow for both businesses and constituents to find

sustainable success. Through coordinated efforts with State and local partners and employers much progress has been made on these efforts.

Hoosier workforce regions have utilized WBL models for many years. Through the VR program, for example, students receiving pre-employment transition services and VR youth and adult participants can access paid internships or work-experiences. Over 4,000 stipends have been issued to students in FY2023 for WBL experiences and VR continues to refine best practices and written guidance and training for VR staff on opportunities to expand WBL opportunities, including paid opportunities, for VR participants. VR service codes have also been enhanced to better track service trends in the number of individuals receiving work-based learning services.

On-the-job and customized training programs, like those mentioned, have been widely used and are very effective tools. Indiana's policies are developed to ensure that our partners continually evaluate and improve their work and learn strategies. Specifically, Indiana's workforce partners are required to review all WBL programs with each company to ensure the training received truly provides a high-quality experience for the participant and helps them either advance at that company or pursue work at another company. Additionally, Indiana's policies require a review of the employment and advancement trends at employers that utilize WBL models to ensure participants are completing training, finding employment, and then persisting in that employment.

DWD Work-Based Learning and Apprenticeships continues its scalable framework for Certified Pre-Apprenticeship (PRAP) and Registered Apprenticeship (RAP). As a comprehensive program, PRAP and RAP provide more flexibility than a registered apprenticeship program, while maintaining a high level of quality and consistency. The PRAP to RAP model strategically incorporates related instruction, on-the-job training, and rewards for skill gain, all leading to at least one industry recognized credential, college credit, and developing a highly trained employee to meet the talent needs of Hoosier employers. These models are easily scaled across the State and have been developed for both the youth and adult populations. The State is actively involved in continuous evaluation of its full strategy for the implementation of registered apprenticeships throughout the State.

By coordinating with local partners, employers, and sector organizations to mitigate employer challenges, the State has been able to generate employer support for broader participation in WBL statewide. The State continues to work with the U.S. Department of Labor Office of Apprenticeship to coordinate information, expansion, and eligibility of apprenticeships in Indiana. Further development of registered apprenticeships will play an increasingly important role with businesses across all industries by providing a pipeline of skilled workers to help them remain competitive. Indiana has over 900 active apprenticeship programs and over 25,000 active apprentices in FY2025. Currently, Indiana is ranked in the Top 4 for the number of total apprentices, new apprentices, and completions among all states and territories. DWD received the 2023 U.S. Department of Labor State Apprenticeship Expansion Formula (SAEF 1) grant, SAEF 2, SAEF 3 Formula, SAEF 3 Competitive and the 2022 Apprenticeship Building America Expansion (ABA) grant

to grow the foundational apprenticeship support ecosystem and increase apprenticeships throughout the State. Through the support of these grants, the DWD has worked with Indiana's U.S. Department of Labor Office of Apprenticeships contacts and other key stakeholders to:

- Identify ways to integrate registered apprenticeship into State education and workforce systems (i.e. WIOA).

- Engage industry and other partners to expand apprenticeship to new and critical sectors, such as IT, healthcare and social assistance, cybersecurity, and business services and to new non-traditional populations at scale, including through career and technical education programs of study design.

- Conduct outreach and work with national, State, and local intermediaries, as well as employers, to design and scale quality WBL programs.

- Conduct research and design pathways in partnership with key stakeholders for Youth Registered Apprenticeship programs.

- Incorporate Registered Apprenticeship programs onto the State's Eligible Training Provider List (ETPL).

- Expand the State's current apprenticeship model using Certified Pre-Apprenticeship (PRAP) programs.

To provide alignment with the workforce system, the LWDBs serve as Registered Apprenticeship Intermediaries to assist in the expansion and facilitation of all Registered Apprenticeship and Pre-Apprenticeship programming across the State. Indiana will continue to expand Registered Apprenticeship programs as well as the number of apprentices enrolled in these programs.

E. ***Partner Engagement with Educational Institutions and Other Education Training Providers****: Describe how the State's Strategies will engage the State's community colleges, adult education providers, area career and technical education schools, providers on the State's eligible training provider list, and other education and training providers, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv). Include how the State's strategies will enable the State to leverage other Federal, State, and local investments to enhance access to workforce development programs at these institutions.*

Indiana's strategies (as detailed in Section II.c.1 and II.c.2). require the engagement of education and training partners throughout the State. The talent developed by these partners is critical in preparing individuals with the knowledge and skills needed for success in the economy and for fulfilling personal goals.

Higher Education: Higher education partners are critical to Indiana's talent development system and are key stakeholders in carrying out the goals and strategies in this Plan. The need to engage with all institutions of higher education – including Indiana's community college system, training providers, and four-year colleges and universities – stems from the recognition that higher education is no longer episodic for Hoosiers, but rather it is continual. In today's economy, workers must engage in continual learning to adapt to innovations in every employment sector. The result is a higher learning system where completion is comprehensive – including everything from micro-credentials and short-term certificates to associate, bachelor, and graduate degrees – allowing learners to build, expand, stack, and show what they know throughout their careers. To attain personal and economic success requires Hoosiers to embrace lifelong learning as they navigate and advance in their careers. Higher education remains a powerful force to address income disparities, close equity gaps, provide personal prosperity, drive economic growth, promote civic engagement in our society, and enhance the quality of life in our Indiana communities.

Career and Technical Education (CTE): Indiana fully launched new secondary career and technical education courses in the 2022-2023 school year. This initiative, called Next Level Programs of Study (NLPS), aims to improve the consistency, quality, and intentionality of CTE instruction across Indiana. The CTE team, now part of CHE, developed the NLPS to align with Indiana's high wage/high demand sectors and to increase the attainment of dual credits and the conferring of technical certifications which transfer directly into associate degrees. The design, structure, and dollars associated with the NLPS are intended to directly incentivize and monetize schools to enroll more students in CTE courses and to support them through completion so that they can graduate high school with significant credits toward a degree.

Eligible Training Providers: While Indiana's institutions of higher education offer a wide-variety of credit-bearing opportunities, the State also offers numerous non-credit options for individuals looking to upskill and/or earn credentials through a different route than college. Rising college costs have led many students and adult jobseekers to pursue alternatives to a four-year degree, but it is important that any alternative still leads to a quality credential that holds currency in the workforce. To promote credentials of value for shorter-term training programs, steps have been taken to ensure that programs on the ETPL lead to an approved credential, including degrees, Registered Apprenticeships, licensures, and industry recognized certifications which appear on Indiana's Promoted Industry Certification List, a list that is validated by Indiana employers. Training providers can only maintain their presence on the ETPL by meeting performance measures based on one of three criteria: completion, job placement, and median wages. One way Indiana has merged other types of education and training programs is through partnerships between apprenticeships and our community colleges. Ivy Tech Community College (ITCC) partners with registered apprenticeships to provide comparable college credits and confer degrees. Vincennes University works with non-unionized organizations to provide college credits and degrees for their registered apprenticeship programs. Based on the ETPL, our LWDBs spearhead the work and partnerships with local postsecondary trainers and partners to ensure Hoosiers are gaining the skills and knowledge necessary for career advancement.

Work-Based Learning and Apprenticeship: DWD Work-Based Learning and Apprenticeship is strengthening alignment across Career and Technical Education (CTE), the Indiana Department of Education (IDOE), and Ivy Tech Community College (ITCC) by mapping training programs to U.S. Department of Labor skill standards and developing consistent, employer-validated training plans. The office is also expanding Certified Pre-Apprenticeship opportunities in partnership with Adult Education and CTE to increase access to high-growth career pathways for both youth and adults.

To ensure quality and consistency statewide, all certified or registered work-based learning programs in Indiana are encouraged to collaborate with INTraining and the Eligible Training Provider List (ETPL) to document program outcomes and demonstrate alignment with comprehensive workforce and apprenticeship standards.

Adult Education: Indiana Adult Education prioritizes activities and services that provide increased employment and economic outcomes for adult students. Specific examples of this work include the requirement for IET trainings to cross-walk to post-secondary credit, the extension of IET trainings to certified pre-apprenticeships, and an increased focus on HSE attainment.

- Indiana is a national leader in IET enrollment with over 4,000 students enrolled in the past program year. The state staff reviews all IET applications prior to program implementation. To ensure portability and stackability of credentials, the certification involved in the IET application must cross-walk to post-secondary credit. DWD has worked with both Ivy Tech Community College and Vincennes University to ensure IETs meet this requirement. This practice was implemented in 2024 to support students on a pathway for additional education.

- In partnership with DWD's Work-Based Learning and Apprenticeship Program, Indiana Adult Education recognized the opportunity to transition IET programming into pre-apprenticeships by adding work-based learning and connection to registered apprenticeships. By recognizing the opportunity to extend IETs into certified pre-apprenticeships, Indiana Adult Education has been able to connect Hoosier students to greater educational and economic opportunity. This initiative has successfully created more than 30 pre-apprenticeships in the adult education space over the past two years. This initiative has been recognized as a best practice nationally and received the NASWA Pinnacle Award for Workforce Innovation.

- DWD recognizes the economic and life-changing impact earning a high school equivalency diploma can have in an adult's life. Both national and state level wage data estimates that earning an HSED can increase an individual's annual income by approximately $9,000 per year. Current census data reveals that over 400,000 Hoosier adults of working age do not have this education degree. While this has been a focus over the past several years, shifts in testing policy and requirements have reduced the number of testing centers in the state of Indiana. Over the past year, DWD has recognized the vital need of ensuring public testing centers are readily available for Indiana adults seeking this foundational certification. Increasing the number of public testing sites within the Indiana Adult Education system will

remain a focus for the next two years to reduce barriers to testing and promote increased economic mobility.

- DWD meets regularly with ITCC to discuss adult service delivery including strategies to connect jobseekers into emerging industries. One area of focus involves workforce needs for infrastructure projects. Agency conversations include adult education, CTE, community college partners, as well as agencies receiving funding for infrastructure development. A priority has been ensuring entry level training, such as adult education Integrated Education and Training (IET), becomes credit for prior learning at post-secondary institutions. This is a priority area for CHE as well, and DWD participated in a taskforce to develop policy and procedures for Prior Learning Assessments. To encourage transition to post-secondary after completion of the secondary diploma, DWD is incentivizing adult education providers to have students complete FAFSA applications prior to graduation.

Other Education and Training Providers: The State's priorities and strategies for advancing partnerships with other education and training providers include:

- Ensuring the transferability of learning and certifications where there are gaps among training providers, institutions of higher education, and employers, as well as in career-technical education courses in the K-12 space; and between the K-12 and higher education sectors, particularly for CTE courses. Efforts by CTE to create the Next Level Programs of Study, aligned with community college curriculums at ITCC and Vincennes University, are aimed to increase dual credit attainment by high schoolers in the CTE space.

- Developing a digital, easily sharable student-owned Learning Employment Record (LER) to track education and career achievements paired with Credential Engine's credential directory and encouraging widespread use of LERs to help match jobseekers to employers.

- Continuing to build upon CHE's work with institutions of higher education to develop a system for recognizing non-credit credentials and other types of prior learning as college credit that can transfer and count towards postsecondary programs. CHE currently leads a Credit for Prior Learning taskforce to assist in these efforts.

- Redesigning career and employment services offered by training providers to support learners throughout their educational experience and connect them to relevant career opportunities.

- Using predictive analytics to identify student needs and tailor individualized support to ensure student success.

- Increasing the number of employers partnering with education and training providers to develop "grow your own" programs for their employees.

Leveraging Resources: As noted in Section II.c.1, Indiana has developed strategies that the State will implement to support in-demand industry sectors, occupations, and career pathways. These

strategies leverage Federal, State, and local investments to enhance access to education and training partner programs.

Federal investments beyond WIOA, such as the CHIPS and Science Act, Inflation Reduction Act, and Bipartisan Infrastructure Law (also known as the Infrastructure Investment Act), are bringing the State's education and training partners to the table to not only re-examine existing training curriculum but also develop new training based on industry demand, especially in new and emerging sectors like semiconductor technologies. Indiana's robust partnerships allow for collaboration on leveraging federal investments. For example:

- Purdue University is the leading university partner for Indiana's Silicon Crossroads Hub and will leverage relationships with consortium partners to support industry's increased production of semiconductor technologies.

- Under the Tech Hub program, education, and training partners – including Purdue University, the University of Notre Dame, Ivy Tech Community College, and Indiana University – are leveraging strengths to drive innovation and production of bioproducts invented domestically.

- Purdue University is playing a major role in the cross-state Midwest Hub (i.e., MachH2) to accelerate the State's clean energy efforts around hydrogen.

- Indiana University's Indiana Resilience Funding Hub will be leveraged to provide communities across the State with access to federal investment funding for environmentally focused projects.

State and local investment supported the increased awareness and access to training programs to support key populations in their career journeys. Under the Regional Economic and Acceleration and Development Initiative (READI), communities leveraged existing resources via match funding to secure READI grants from the State to support regional talent development and attraction. The workforce needs varied across the State whether it was Stellantis announcing the expansion of manufacturing operations in Kokomo to build a second battery plant, or Eli Lilly breaking ground to support its manufacturing operations in Lebanon.

VR continues to facilitate a Transition Advisory Council in close partnership with the Indiana Department of Education (IIDOE), DWD, CTE, local schools, and a wide range of other State agencies, advocacy groups and stakeholders. This council serves in an advisory capacity for statewide pre-employment transition services; however, the group also focuses heavily on sharing of resources, information, and best practices on transition from school to work services across partners. Additionally, VR maintains MOUs with IIDOE and DWD to support collaboration in serving students.

F. ***Improving Access to Postsecondary Credentials***: *Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including Registered Apprenticeship certificates. This includes credentials that are industry-recognized certificates, licenses or certifications, and that are portable and stackable.*

Indiana recognizes that the path to graduation is not a one-size-fits-all and instead, provides many pathways for students to earn a high school diploma. The Indiana Graduation Pathways empower students to individualize their graduation requirements to align with their postsecondary goals in one of three paths: Enrollment, Employment, and Enlistment leading to military service. No longer must students fit into the same academic mold, but rather, they can choose the high school options that best meet their post-secondary goals and aspirations. Beginning with the Class of 2023, students must meet (1) diploma requirements, (2) learn and demonstrate employability skills, and (3) at least one postsecondary-ready competency (e.g., honors diploma, SAT, ACT, ASVAB, industry certification, apprenticeship, CTE concentrator, AP/IB/Dual Credit/Cambridge International/CLEP, locally created pathway – approved by the State Board of Education, or a waiver). Indiana's "re-thinking of high school" aims to expand access to intentional college credit opportunities that allow students to earn transferable, stackable credentials before graduation, as well as high-quality work-based learning experiences. The future of our students, our communities, and our State depends on a K-12 system that helps everyone succeed, whether their post-graduation plans include employment, enrollment, or enlistment leading to service. Progress will continue to be tracked in the Indiana Graduated Prepared to Succeed dashboard (Indiana GPS: https://indianagps.doe.in.gov/).

In 2023, the Indiana General Assembly passed House Enrolled Act (HEA) 1002 which, at its core, sought to implement new high school diploma requirements that are more flexible and relevant to students, employers, and communities while also improving access to high-quality work-based learning opportunities and increasing the number of postsecondary credentials earned by students before they graduate high school. From HEA 1002, the State also established Career Scholarship Accounts (CSA) which enable students in grades 10-12 to access funding to pay for career training beyond the classroom. This expansion of work-based learning will enable Hoosier students to earn a post-secondary credential before graduating from high school.

Indiana's strategies will improve access to activities leading to recognized postsecondary credentials. Through programs like the CHIPS and Science Act, Tech Hubs, and more, Indiana is poised to make strong investments in talent development to support the in-demand occupations of growing industry clusters like semiconductor manufacturing, clean energy, electric vehicle manufacturing, biolife sciences, etc. State workforce partners will continue to meet with industry leaders to determine their staffing needs in these fields and to coordinate training, work-based learning experiences, and stackable credentials in order to meet employer demand.

The additional strategies outlined below further support the State's strategies:

Establishing Shared Definitions: Indiana's Department of Education (IIDOE), in coordination with Indiana Commission for Higher Education (CHE), Indiana Department of Workforce Development (DWD), and the former Governor's Workforce Cabinet (GWC), led statewide efforts in establishing shared definitions of high-quality work-based learning and credentials of value. IIDOE conducted a Graduation Landscape Analysis in 2023, where it evaluated evolvement of graduation pathways and diploma requirements and engaged stakeholders to help focus Indiana's work into three key areas1:

- Diploma Requirements: making high school diploma requirements are more flexible and relevant to students, employers, and communities

- High-Quality Work-Based Learning: improving access to and the number of students completing high-quality work-based learning opportunities

- Credentials of Value: increasing access to and the number of students completing high-value postsecondary credentials before high school graduation

These definitions aim to ensure that students graduate with knowledge, skills, and experiences that align with the needs of employers, communities, and our State. They also help to prioritize State funding efforts. A statewide advisory group with representation from all the major partners – IIDOE, CHE, DWD, and Indiana Office for Career and Technical Education (CTE) – is outlining a process to evaluate credentials in alignment with the proposed rulemaking for Workforce Pell. The performance metrics established during this process will better identify Credentials of Value and will allow the State to better incentivize the attainment of credentials that offer the greatest return on investment.

Work-Based Learning and Apprenticeship: Indiana's work-based learning and apprenticeship strategies continue to strengthen access to postsecondary credentials. Through the efforts of DWD Work-Based Learning and Apprenticeship, Career and Technical Education (CTE), the Indiana Department of Education (IIDOE), and Ivy Tech Community College training programs are being aligned to U.S. Department of Labor skill standards, creating consistent, industry-recognized training plans across multiple sectors.

Workforce Ready Grant (WRG): DWD's implementation of the WRG program has continued to support individuals who are seeking training and skills necessary to succeed in the 21st Century economy. This program is implemented through the Regional Workforce Boards and a select group of higher education institutions. During Program Year 2024, WRG had 924 enrollments through RWBs with an 89% credential rate and 787 enrollments through high education institutions with a 75% credential rate. DWD is in the process of evaluating individual WRG providers to ensure minimum levels of performance are met.

G. ***Coordinating with Economic Development Strategies:*** *Describe how the activities identified in (A) will be coordinated with economic development entities, strategies, and activities in the State.*

The SWDB and DWD work closely with the Indiana Economic Development Corporation (IEDC) and the Indiana Chamber of Commerce to ensure the alignment of efforts and strategies spanning workforce and economic development. DWD's Workforce Solutions and Engagement Team often partners with IEDC, for example, on attraction and retention projects across the State. As federal funding is brought to Indiana, we will work to align economic development strategies with apprenticeship opportunities, which will support career pathway development in high growth sectors.

At the local level, economic development partners are members of and/or engaged in the work with the LWDBs. As discussed in III.a.2.D, to prepare for the future state of the workforce, workforce development partners such as SDWB, DWD, and LWDBs will work toward creating more opportunities for discussions and joint presentations with IEDC and the Chamber. This will promote action around increasing the number of good jobs, diversifying the economy, and continuing to grow the State's global competitiveness. As a result, State and local partners will have more targeted and coordinated talent and business development strategies.

B. State Operating Systems and Policies

*The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in section **II Strategic Elements**. This includes-*

1. *The State operating systems that will support coordinated implementation of State strategies (e.g., labor market information systems, data systems, communication systems, case management systems, job banks, etc.).*

DWD utilizes and/or makes available to its constituents a variety of tools and systems to aid in service delivery to help them find or transition back into suitable employment. Some of these tools and systems include:

1. **JOBS Program.** This is a program that utilizes the ACT WorkKeys job profiling and assessment system to help employers identify the workplace skills needed for their profiled jobs. Using the WorkKeys assessments, employers ensure an applicant's skill level is an appropriate match for success in the job. Approved JOBS Program applications receive WorkKeys job profiling services and assessments at no cost.

2. **WorkKeys.** These assessments measure foundational skills required for success in the workplace. Prior to accepting application for employment, employers that participate in WorkKeys job profiling can require applicants to demonstrate or document a certain level of skill determined by the job profile. In addition, WorkOne constituents can complete select WorkKeys assessments (applied math, graphic literacy, and workplace documents) to document their skills for the National Career Readiness Certificate (NCRC) a credential that verifies a participant's skill at bronze, silver, gold, or platinum levels.

3. **WIN Learning.** This is an online Career Readiness courseware comprised of workplace hard and soft skills. Modules focus on digital literacy, career readiness 2.0, college readiness, and supplemental skills aligned to the WorkKeys assessments. The soft skills curriculum consists of four modules that include communicating effectively, conveying professionalism, promoting teamwork and collaboration, and thinking critically and solving problems. The five digital literacy modules include computer operations, internet browsing, digital communication, digital documents, and digital security. The career readiness 2.0 modules include applied math, graphic literacy, and workplace documents and there are college readiness modules that include: pre-algebra, algebra, geometry, and reading, writing, and English. Additionally, the courseware offers supplemental skills that includes business writing, applied technology, and workplace observation. As part of the suite of WIN products, constituents have access to the Academic Skills courseware which includes work ready math, work ready reading, and work ready data. WIN courseware offers placement tests and is adaptive to align to the WorkKeys skills and provides preparation and remediation for the WorkKeys assessments.

4. **Indiana Career Connect (ICC).** ICC is Indiana's official workforce services delivery system and database of record. ICC provides online labor exchange and case management tools available to employers, jobseekers, and case managers. Using the online labor exchange tools available in ICC, constituents can register for work, create, and send resumes, complete work-readiness assessments, access training provider resources and regional labor market information. Additionally, case managers use the system to document eligibility, activities, and notes related to participants. Activities include the required joint development of the Individual Employment Plan (IEP), recorded assessments, scanned documents, reports, and copies of individual credential attainments. As the database of record, ICC contains reporting functionality for WIOA, TAA and various local programs as well as functionality that assists case managers with making referrals, connecting constituents to training and education, managing job placement and retention as well as reporting for performance management.

5. **Career Interest & Aptitude Assessments/Indiana Career Explorer.** This is an online career planning system with aptitude assessments for Indiana students (grade 6 and above), postsecondary students, and any adult resident of Indiana. By accessing *Indiana Career Explorer*, Hoosiers can complete a research-based career assessment that helps match interests with their occupational goals. Additionally, the site links resources for education planning to help individuals visualize which industry or career path, field of study, or school to pursue next in life.

6. **Hoosiers by the Numbers.** This is Indiana's primary website for Labor Market Information (LMI), which provides multiple types of data outputs, including dashboards, profiles, radius tools, and Tableau visualizations. The website allows Indiana to disseminate critical labor market information to meet Federal and State objectives. Local areas can use this dashboard to define local priorities and areas for growth. The core of *Hoosiers by the Numbers* is strong navigation geared to people looking for their county or region or a specific piece of data on a workforce-related topic. The site is powered by more than 7 billion records in the joint databases of the Indiana Business Research Center (IBRC) and DWD and is meant to serve as a leading informational site for business developers, researchers, and the public alike.

7. **Top Jobs Indiana.** Top Jobs Indiana is the state's primary tool for identifying current and future high-demand, high-wage occupations. This online resource allows individuals to explore which industries and jobs are most in demand at the state, regional, and county levels, helping Hoosiers make informed career and training decisions.

   Top Jobs Indiana replaced the previous IN Demand Jobs model in July 2025, following the requirements of HEA 1609, which mandated a review and update of the "Flames" methodology by January 1, 2025. The original INDemand Jobs system, adopted in 2017, ranked occupations based on demand, growth, and earnings and informed workforce and

education policy statewide. The new methodology introduces weighted indicators for scoring and descriptive indicators for deeper insights.

Key Changes in the New Methodology

- Weighted Indicators (used in scoring):
    - Demand – Likelihood of consistent employment opportunities.
    - Retention – Stability of the occupation and ability to reduce churn.
    - Growth – Speed of employer demand increase.
    - Earnings – Relative value employers place on the occupation.
- Descriptive Indicators (informational only):
    - Job Transferability – Adaptability across industries.
    - Upward Skills Mobility – Potential for career advancement.
    - Job Stability – Resilience and likelihood of full-time work with benefits.
    - Skill Change – Degree of disruption from technology and evolving skills.

By incorporating these indicators, Top Jobs Indiana provides a more comprehensive and forward-looking view of the labor market, ensuring that workforce and education strategies align with Indiana's economic needs.

8. **Tests of Adult Basic Education (TABE).** TABE is primarily a web-based assessment of basic and secondary education knowledge foundational for the workplace. Constituents and case managers utilize TABE to identify potential basic skills deficits and challenges prior to enrolling individuals in an occupational training program or postsecondary education.

9. **Credential Engine.** DWD has partnered with the Indiana Commission for Higher Education in its support and utilization of *Credential Engine*, an international registry of available credentials that provides Hoosiers more transparency in the spectrum of credentials available in Indiana. This tool will comprise of all credentials from Indiana's postsecondary institutions, as well as those found on the ETPL, allowing Hoosiers to better analyze their options for potential credentials in the Indiana marketplace and select the training option that best meets their needs.

10. **Pivot (Workforce Recommendation Engine).** DWD launched the Workforce Recommendation Engine (WRE) in 2023. (The WRE was rebranded as Pivot in 2024.) Pivot is an AI-based software in Uplink, Indiana's Unemployment Insurance system, that provides a list of suggested jobs that best align with the user's work history and skill set. This new tool is not a job board but serves as an additional method for filling talent needs while

increasing awareness of the types of jobs employers are seeking to fill. As Hoosiers continue to use Pivot, the data collected will be shared with employers in hopes of adjusting occupations, requirements, or benefits to make listings more attractive to jobseekers. DWD continues to evaluate Pivot to determine broader applications outside the Uplink system (e.g., with WorkOne clients).

11. **Learning Management System.** In partnership with U.S. Department of Labor, DWD and Indiana Vocational Rehabilitation Services (VRS) developed a training program to cross-train staff within the WorkOne centers (Indiana's term for American Job Centers) and VRS field offices to better coordinate and deliver services to joint customers. Two training courses were developed regarding Workforce Collaboration and Integration: (1) Co-enrollment and Joint Case Management and (2) Indiana's Workforce System and WIOA Program Partners. The training was launched to DWD and VRS field office personnel in PY22.

13. **INTraining.** *INTraining* presents a broad and diverse selection of occupational training programs that support the employment goals of Indiana's workforce. *INTraining* is comprised of two lists: *INTraining* list and the ETPL. The *INTraining* list contains all training provider applicants whose training programs meet the basic application standards set by DWD. The ETP list contains a subset of the *INTraining* providers whose training programs meet additional demands and performance criteria set by DWD per WIOA. These training programs are eligible for WIOA funding through the local WorkOne office.

DWD also maintains and continues to expand the Workforce Information Database (WID) with State and local data that cover at least the most recent ten-year period, as well as any federally applicable changes mandated. The WID serves as a primary source for Indiana's Labor Market Information website (www.hoosierdata.in.gov) and is supplemented by the STATS Indiana databases, which have been built and maintained by DWD's university partner, Indiana Business Research Center (IBRC), for more than 30 years. Today, both the WID and STATS databases power Hoosiers by the Numbers and STATS Indiana through our partnership with the IBRC. The data covers counties, metropolitan statistical areas, economic growth regions, and a balance of State areas, in addition to statewide estimates and aggregates and small area data for census tracts, zip codes, and radii. The STATS databases also include data for other states, which powers our tools for those needing bordering county/State data.

In PY2023, the website platforms supported by DWD Research and Analysis tallied nearly half a million unique users. Nearly 1.5 million web pages were viewed during that 12-month period. The primary website for LMI is *Hoosiers by the Numbers* website, which provides multiple types of data outputs, including dashboards, profiles, radius tools, Tableau visualizations, and more.

In addition, the DWD Performance Reporting and Data Integrity unit builds upon data made available through Research and Analysis Data Warehouse (RADW, formerly Indiana Workforce Intelligence System or IWIS) and our case management system to deliver enhanced, customized performance metrics and to provide research request responses related to Title I and Title III, as

well as additional State and Federally funded workforce programs. Examples of this work using UI wage record data for Federal performance metrics can be found here: https://www.in.gov/dwd/performance/. Additional programmatic evaluations are performed upon request. Regional Analysts work in conjunction with locals to provide and analyze labor market information. The level of collaboration between State and local staff does vary by region. Business Intelligence State staff funnels information through the local business services reps as opposed to working directly with employers. One area of opportunity Indiana will explore through this Unified Plan is to develop a more coordinated approach with other agencies and our local workforce development boards to serving and sharing information with employers to avoid employer fatigue.

RADW (formerly IWIS) was developed as the State's longitudinal data system in 2007 as a joint project of DWD, Indiana Business Research Center of Indiana University (IBRC), Indiana Commission on Higher Education (CHE) and the Indiana Department of Education (IIDOE). Except for Career and Technical Education data, the database currently does not have other IIDOE data, but the system has continued to serve both as DWD's data warehouse as a means of connecting higher education and workforce records for ROI reporting and to deepen understanding of the education-to-workforce continuum. In 2014 the decision was made to request proposals to conduct an analysis of the current system and its capabilities to design a production-level system to augment or replace it as the State's student (P-20W) longitudinal database. IWIS was renamed the Indiana Network of Knowledge (INK) by legislative action and a broader governance committee (including the Commissioners of DWD, CHE, and IIDOE) headed by the Governor was established. As of July 1, 2017, INK underwent yet another change and was renamed the Education and Workforce Data (EWD) warehouse now housed under the Management and Performance Hub (MPH) reporting to the governor's office. However, to sustain continuity of available data, DWD continues to maintain its workforce warehouse (RADW) of existing data series and seeks to expand and enhance it with data series useful for labor market and training research, in collaboration with, and potentially outside the scope of MPH. The RADW currently houses over 725 million records.

Many data requests continue to be fulfilled through the RADW, using data from BLS programs, unemployment claims, Indiana Career Connect, and the case management systems, as well as reports combining wage data and higher education data. The data stored in RADW has been used in different studies ranging from post-graduation employment and wage outcomes, effects and impacts of the COVID-19 pandemic, economic and health status of the population, etc. Several outreach programs have been developed in conjunction with the governor's office and MPH as well as the Region 12 service provider. These programs reach out to the unemployed who have filed for unemployment benefits to offer further services upon qualification.

In the past, DWD has provided data to inform improving of veteran services, apprenticeship programs at a community college, and KPIs for the governor's office. Staff are in constant communication with MPH, which displays the final KPIs created by DWD and is available for data alterations and verification as required. Additionally, the RADW staff has continued to develop skills in data visualization tools such as Tableau and open-source coding languages (Python and R). Dashboards are in progress to provide further information to stakeholders as available. The

RADW continues to operate in a secure environment called the "protected zone", a semi-virtual machine environment with SQL Server installed.

A data hub has been created by MPH for users to access public facing data sets and is currently published on MPH's website. Datasets are also available through a request process at MPH. Data from DWD are also available in dashboard format on DWD's website and include Occupational Employment Estimates (OES), Occupational Projections, Funded Eligible Training Programs, and data for the Indiana Composite Education Score, which provides the most common education attainment level needed for an occupation based on U.S. Bureau of Labor Statistics, O*NET, American Community Survey, Current Population Survey data, and job postings by county. Data sets for this hub have been contributed by other agencies and partners, such as IBRC, Indiana Department of Homeland Security, CHE, the Indiana Department of Transportation, and several other agencies.

2. ***The State policies that will support the implementation of the State's strategies*** *(for example, co-enrollment policies and universal intake processes where appropriate) In addition, provide the State's guidelines for State-administered one-stop partner programs' contributions to a one-stop delivery system and any additional guidance for one-stop partner contributions.*

Several State policies have been issued or updated to ensure successful implementation of WIOA, and others will be developed to support the strategies identified in this Plan. A sampling of such policies is listed below. Current DWD policies and guidance referenced below can be accessed via DWD's active policy webpage at https://www.in.gov/dwd/compliance-policy/policy/active/.

- **Co-enrollment:** Based upon an individual's eligibility criteria and services for which they qualify, WorkOne offices offer Hoosiers a package of potential programs and services. Frontline staff work with the individual's aspirations to determine which programs meet the individual's needs, which may include more than one or two programs. Co-enrollment can range from being a reportable individual in a specific program up to and including full activation as a participant in the program. DWD has developed policy regarding Indiana's co-enrollment and common exit strategies. While co-enrollment is not mandated for most programs, it is highly encouraged. See DWD Policy 2021-08, Change 1.

- **Partner Shared Costs:** DWD issued guidance and technical assistance in the development of partnership and Memoranda of Understanding (MOUs) and infrastructure funding agreements (IFAs) between local workforce development areas (LWDAs) and partners of the one-stop delivery system. This guidance promotes a locally driven, locally negotiated process for partnering and sharing costs within each LWDA. MOUs must be completed at least every three years and budgets for IFAs must be completed on or before July 1st of each program year unless an extension is granted for additional time to reach agreement. See DWD Policy 2018-04, Change 3.

- **WIOA Adult Priority of Service:** DWD's WIOA Adult Priority of Service guidance emphasizes that, if a participant is a public assistance recipient, a low-income individual, or a basic skills deficient individual, then the participant must be categorized under the applicable priority population in addition to any locally established priority groups. This guidance also provides information on U.S. Department of Labor priority of service benchmarks and includes a form through which local areas may submit requests to create locally established priority groups. LWDAs must have written policies that delineate how they will give priority of service and must adhere to these policies. DWD will review data and local policies to ensure priority is being carried out appropriately and will provide technical assistance as needed. See Policy 2019-04, Change 3.

- **Apprenticeships and Work-Based Learning Experiences:** Expanding access to apprenticeships and work-based learning experiences is a key focus for Indiana. DWD developed guidance to assist with the implementation of any federal apprenticeship grants the State may receive. DWD Policy 2022-09, Change 1, provides local workforce development boards and other stakeholders with an overview of grant requirements and basic grantee responsibilities for U.S. Department of Labor apprenticeship grants. The policy is designed to provide high-level, general information that applies to all U.S. Department of Labor Apprenticeship grants (key definitions, eligibility, co-enrollment, grant performance management, etc.). This policy was issued with technical assistance discussing how apprenticeship data is recorded in Indiana's case management system (DWD TA 2022-10, Change 1). Additionally, DWD often develops technical assistance specific to each grant that Indiana may receive. For example, DWD issued technical assistance regarding the Apprenticeship Building America Grant (DWD TA 2022-17).

- **Training Programs:** Related to Indiana's goal to prepare future skilled workers and connect them with employers, DWD policy outlines the criteria to qualify for Indiana's Eligible Training Provider List (ETPL) as well as INTraining. See DWD Policy 2020-16, Change 3, and DWD TA 2020-17, Change 3. Training programs on Indiana's Eligible Training Provider List may be funded through Individual Training Accounts, which are described in DWD Policy 2017-09, Change 2. This policy creates a uniform process for issuing individual training accounts (ITAs), identifies the parameters for development of a local area ITA policy, and standardizes the delivery of ITAs in order to allow local areas to consistently provide training opportunities to participants leading to employment for an in-demand occupation. On-the-job training also offers opportunities for Hoosiers to upskill for in-demand jobs. DWD Policy 2022-02, Change 1, provides guidance on the implementation and operation of regional on-the-job training programs funded by the WIOA Title I Adult and Dislocated Worker programs.

- **Customer Experience:** To improve the quality of training and career coaching, it is vital for our workforce system to be responsive to customer feedback. DWD Policy 2023-04 outlines guidance regarding the use of the automated check-in system, VOSGreeter®, in WorkOne offices. Statewide implementation of this tool allows Indiana to collect data on what

motivates Hoosiers to visit a WorkOne. DWD developed guidance to ensure uniform administration of the Customer Satisfaction Survey to support 34 CFR 463.800(a)(2), as seen in DWD Policy 2023-19. Both VOSGreeter® and the Customer Satisfaction Survey collect important data that can help Indiana provide high-quality, transparent service that meets Hoosiers' needs.

- **Equal Opportunity:** In accordance with 29 CFR Part 38 and Indiana's strategic initiatives to ensure high-quality service for protected populations, DWD Policy 2016-09, Change 1 provides initial guidance regarding the observance and enforcement of the nondiscrimination and equal opportunity provisions of Workforce Innovation and Opportunity Act, specifically WIOA Section 188 and its implementing regulations at 29 CFR 38. In addition to DWD Policy 2016-09, Change 1, DWD has issued DWD TA 2021-07, which describes the complaint procedures for Equal Opportunity and nondiscrimination violations. Equal Opportunity provisions are also embedded in other program guidance such as DWD Policy 2020-09, Change 1, which covers the one-stop certification process and requires that center certifications include reviews of programmatic and physical accessibility. DWD issued DWD Policy 2023-07 to provide language accessibility guidance to further enhance tools and resources available for partners and programs.

- **Supportive Services:** Ensuring access to supportive services is a crucial step in mitigating the barriers that prevent Hoosiers from participating in training programs or finding employment. From assistance with child and dependent care to assistance with transportation, supportive services give participants the tools to overcome obstacles and achieve upward mobility. In alignment with 20 CFR 680.900, DWD Policy 2021-02 includes guidance and context regarding supportive services for WIOA Title I Adult and Dislocated Workers including individuals participating through Dislocated Worker Grants.

- **Migrant and Seasonal Farmworkers (MSFWs):** In support of Indiana's strategy to ensure service to protected populations, DWD Policy 2022-19, Change 1, provides guidance to Indiana's workforce system regarding the mandated requirements for the Monitor Advocate System and the provision of services to MSFWs. DWD has also issued a desk guide to assist WorkOne offices as they serve MSFWs, which is available through 2022-19, Change 1, Attachment B. DWD is reviewing this guidance and anticipates updates to ensure alignment with the Final Rule.

- **Priority of Service for Veterans and Eligible Spouses:** To ensure Veterans and Eligible spouses receive service in alignment with federal regulations, Title 38 U.S.C., VPL 07-09, and TEGL 10-09, DWD Policy 2015-08 addresses Priority of Service for Veterans and Eligible Spouses under WIOA. With respect to any qualified job training program, a covered person (Veterans and Eligible Spouses) shall be given priority over a non-covered person for the receipt of employment, training, and placement services provided under that program, notwithstanding any other provisions of the law. This policy supports Indiana's strategy to mitigate barriers for protected populations and provide high-quality service.

- **Center Certifications:** Title I of WIOA requires the State Workforce Development Board, in consultation with Chief Elected Officials and local boards, to establish objective criteria and procedures for the local boards to evaluate and certify the comprehensive and affiliate one-stop centers located within their Local Workforce Development Areas. DWD Policy 2020-09, Change 1 describes Indiana's criteria for center certification and the process for identifying whether one-stop centers are eligible for certification. This policy also includes the review form that certification teams use when evaluating one-stop centers.

3. ***State Program and State Board Overview***
   A. ***State Agency Organization****: Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.*

The State Workforce Development Board (SWDB), reconstituted by Executive Order 25-77, replaced the Governor's Workforce Cabinet (GWC), which was dissolved by legislation effective July 1, 2025. The SWDB helps inform policy and advises the Governor on workforce initiatives. It serves as a cross-agency convener and works collaboratively with key agency partners towards a statewide vision to connect education, workforce, social services, and economic development initiatives. The SWDB also sets policy for workforce activities managed regionally by the local workforce development boards (LWDBs).

The SWDB and its members have a mission to address current and future education and employment needs of both individuals and employers, strengthen Indiana's economy by integrating and aligning State and Federal resources, ensure a talent-driven education and workforce system, and complete other duties as directed by the Governor or legislature. The SWDB works with all agencies in the workforce ecosystem to drive policy recommendations through regular meetings or through the Unified Plan.

The Department of Workforce Development (DWD) is the state agency responsible for administering and overseeing all WIOA programs under Titles I, II, and III, and is the administering agency of the SWDB. DWD oversees operations managed regionally by the LWDBs. The Family and Social Services Administration (FSSA), through its Bureau of Rehabilitative Services, is the state agency responsible for the administration and oversight of WIOA programs under Title IV.

The SWDB operates as the state advisory body for the programs contained in this Unified State Plan. On behalf of the Governor and in collaboration with the SWDB, DWD operates as the designated administrative entity for WIOA Titles I, II, and III, the Unemployment Insurance system, and other federal and state programs. As such, DWD is named the sole agency to plan, coordinate, implement, monitor, and make recommendations regarding initiatives designed to prepare Indiana's workforce for effective participation in the competitive and global economy (see IC 22-4.1).

Indiana's longstanding structure has included a total of twelve (12) designated local workforce developments areas with a LWDB in each (per Executive Order 25-45 (https://www.in.gov/gov/files/EO-25-45.pdf), WIOA regional identification and local area designations are currently under review). LWDBs are responsible for the oversight of funds and activities, delivering career assessments, job search, and education and training related services through WorkOne offices (Indiana's term for American Job Centers) established by the local board. Indiana has identified regions 5 and 12 as a planning region in the state.

Indiana, along with Kentucky, created the first Bi-State Planning Region by resolution of the former Governor's Workforce Cabinet and Kentucky Workforce Innovation Board. Indiana's Region 10 Workforce Board created the Bi-State Plan with Kentuckiana Works to advance the regional workforce. This Plan was the first of its kind to merge interstate regions into one designated workforce hub. This significant collaboration exists between local areas Indiana Region 10 and Kentuckiana Works in order to develop the regional plan around the Louisville metropolitan area, which includes urban and rural sprawl in southern Indiana. The Bi-State Regional Plan creates an innovative picture of the region's economy and workforce environment through joint Indiana-Kentucky strategies to attain regional goals and objections.

Workforce, education opportunities, and other needed individual services and resources are delivered on a local level through WorkOne American Job Centers (WorkOnes) established by the LWDBs and managed by Executive Directors and One-Stop Operators. WorkOne operations are engaged and reviewed by the SWDB, DWD, and the coordinating LWDB. Local boards and Wagner-Peyser staff assist DWD with the administration of the workforce system. Other crucial partners in the workforce system include employers, our public and private institutions for higher education, school districts, CTE districts, community action centers, and local organizations providing adult education and other services. Indiana is driving a focused effort on technical assistance, training, and coordination for services leading to a comprehensive system that is better equipped to serve Hoosiers effectively.

Operations of the SWDB are supported primarily by DWD's Program Administration and Oversight (PAO) department, including a dedicated SWDB Director:

- Jacob Harkin, State Workforce Board Director

The DWD Executive Team consists of:

- Interim Commissioner/Chief Administrative and Financial Officer, Mike Smith

- Chief Workforce Officer, VACANT

- General Counsel, Beth Green

- Chief Information Officer, Keith Isom

- Chief Unemployment Insurance Officer, Holly Newell

- Chief of Communications & Government Affairs, Elizabeth Presson

DWD's Organizational Chart showing additional leadership staff structure is below:
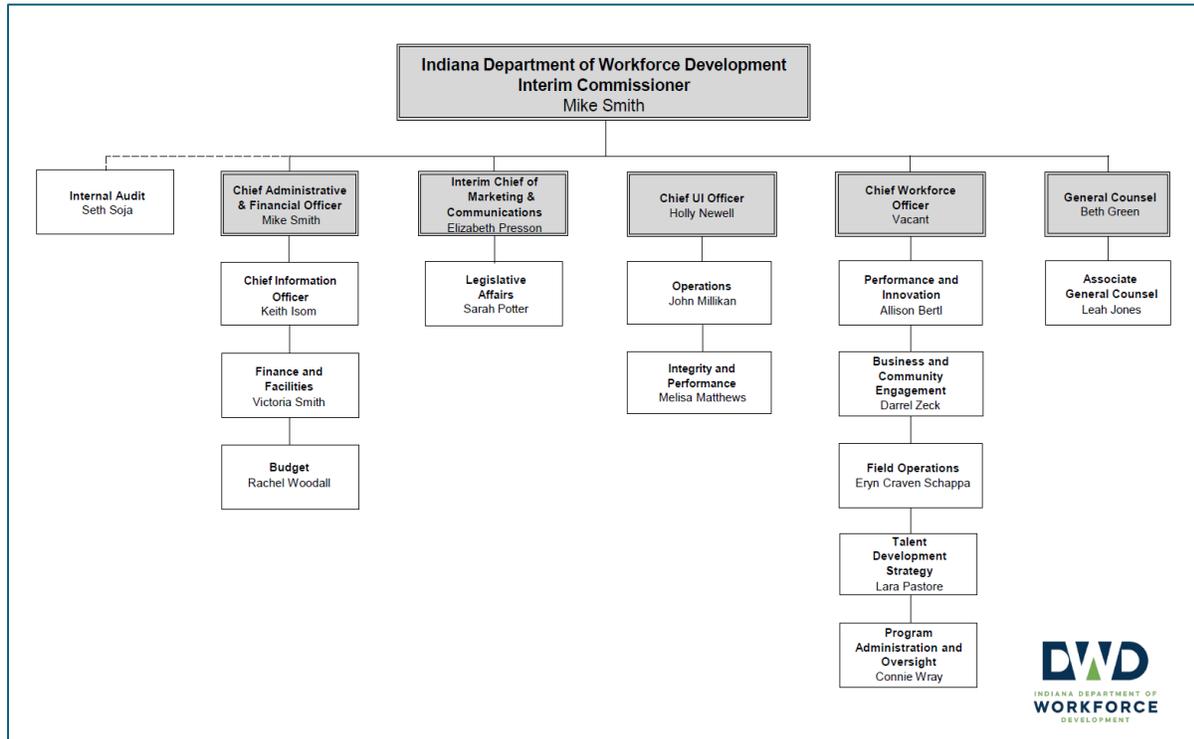
FSSA, through its Bureau of Rehabilitative Services, is the state agency responsible for the administration and oversight of WIOA programs under Title IV. An organizational chart of FSSA leadership can be viewed at: http://www.in.gov/fssa/4829.htm.

B. ***State Board***: *Provide a description of the State Board activities that will assist State Board members and staff in carrying out State Board functions effectively. Also, provide a membership roster for the State Board consistent with 20 CFR 679.110-120, including members' organizational affiliations and position titles.*

Between 2018 and 2025, Indiana operated the Governor's Workforce Cabinet (GWC) under an approved waiver from the U.S. Department of Labor to maintain an alternative state workforce board membership structure rather than the structure identified within 20 CFR 679.110-120, while carrying out the responsibilities of the State Board under 20 CFR 679.130. Because legislation dissolved the GWC effective July 1, 2025, Indiana has been working to reconstitute the SWDB since that time. DWD, as the administering agency of the SWDB, and in alignment with Executive Order 25-77, completed the initial solicitation process to collect nominees for SWDB reconstitution. As of February 2026, the nominee list is under review in preparation for the Governor's official member appointment determinations, anticipated to occur during February-March 2026. The proposed nominee list prioritizes required membership categories and minimum seats to expedite initial reconstitution of the SWDB. No names were provided for optional members unless needed to fulfill the 20% workforce membership requirement. As nominees were solicited in accordance with WIOA membership requirements, Indiana will not be seeking to renew the previous waiver upon its June 2026 expiration. Membership will instead align with WIOA regulations (20 CFR 679.110) as outlined below:

2026 SWDB Membership Categories
- State Government
  - Governor
  - One member from each chamber of the state legislature
- Business (minimum 10 members)
  - Must be majority of SWDB, excluding Governor and Legislators
  - Must include one small business representative
  - Members must meet certain role and organization requirements
- Workforce (minimum 4 members)
  - Must be minimum 20% of SWDB, excluding Governor and Legislators
  - Includes labor organization and registered apprenticeship requirements, with optional community-based organization membership
- WIOA Core Programs (minimum 3 members)
  - WIOA Title I and Title III (Adult, Dislocated Worker, Youth; Wagner-Peyser)
  - WIOA Title II (Adult Education – must be unique representative)
  - WIOA Title IV (Vocational Rehabilitation – must be unique representative)
- Local Government (minimum 2 members)
  - Chief Elected Officials (cities/counties)
- Optional (Indiana may add at a later time)
  - State agency representatives (one-stop partners, economic development, juvenile justice, education)

o Indian tribe/tribal organizations

Following official SWDB appointments and designation of a SWDB Chair, DWD will coordinate the first meeting (anticipated March-April 2026). Meetings will likely be held quarterly thereafter. Initial SWDB activities will involve member training, establishment of bylaws, and creation of an Executive Committee. Additional committees may be established as the SWDB operations are further underway.

4. ***Assessment and Evaluation of Programs and One-Stop Program Partners***
   A. ***Assessment of Core and One-Stop Program Partner Programs:*** *Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. Describe how other one-stop delivery system partner program services and Combined State Plan partner programs included in the plan will be assessed each year. This State assessment must include the quality, effectiveness, and improvement of programs broken down by local area or provider. Such state assessments should take into account local and regional planning goals.*

DWD utilizes a variety of processes and reporting tools for regular monitoring of program performance to drive quality improvement and effectiveness. Some of the methods utilized are outlined below:

Federal Performance Metrics. DWD currently follows the six primary indicators of performance described under section 116(b)(2)(A) of WIOA.

For the PY24/PY25 local performance negotiation cycle, DWD issued Local Performance Negotiations Guidance (Memorandum 2021-25) DWD utilized a local statistical adjustment model (LSAM) to provide local areas with performance estimates. These estimates were then used to inform negotiations for performance measures for the PY24/PY25 performance cycles. At the end of PY24 DWD conducted its first year-end performance assessment, utilizing the LSAM model to create performance estimates for local areas.

During this year-end assessment, an adjustment is made based on the actual performance and participant characteristics and economic conditions that took place over the program year. Each local area is provided with a local area performance assessment and is required to meet a 50% threshold for each individual WIOA measure and a 90% threshold for each overall program measure. In the event a local area fails to meet these required thresholds once the adjustment has been applied, DWD will take steps to provide formalized technical assistance that could include or require the development of a performance improvement plan or reorganization of the local board.

Programmatic and Fiscal Compliance Monitoring. DWD conducts regular monitoring of each local workforce development area (LWDA) to examine compliance with statutory, regulatory, and

policy-driven requirements, as well as identify areas in need of administrative, financial management, programmatic, and/or systemic improvement. WIOA Title I programs are monitored on an annual basis and formal reports are issued identifying compliance findings, areas of concern, and best practices. DWD's monitoring process, and expectations for local level monitoring, are described in DWD Policy 2024-07, Change 1 and additional monitoring resources are available at https://www.in.gov/dwd/compliance-policy/monitoring/.

DWD continues to work toward a more unified, consistent approach to monitoring across its various workforce programs. Many workforce programs now participate in concurrent reviews during the Title I review process. DWD works with the LWDAs to develop a comprehensive schedule of review activities for the week with each program conducting their own interviews with LWDA staff. The full team of DWD monitors participates in entrance and exit conferences with LWDA leadership and programs use a consistent framework for sharing results of their monitoring activities.

DWD's Oversight and Monitoring Strategic Plan (OMSP) assists in streamlining and modernizing workforce program and grant oversight activities. The OMSP communicates a consistent vision and approach for oversight and monitoring across all workforce program areas, while remaining agile as structure and priorities evolve. The OMSP highlights four priority areas:

- Priority 1: Adequate monitoring and oversight of workforce programs
- Priority 2: Culture of continuous improvement through oversight and monitoring
- Priority 3: Manage performance and grantee support
- Priority 4: Strengthen fiscal efficiency across all workforce programs

To carry out the strategies and focus areas of the OMSP, DWD established a standing Quality Workgroup consisting of staff responsible for program monitoring in various workforce areas. The Quality Workgroup is tasked with ensuring continuous improvement through sharing of best practices and identification of technical assistance and training needs. For example, for the past four years (PY21-PY24), DWD has developed a Year-In-Review (YIR) publication with aggregated WIOA compliance review outcomes, including noteworthy practices, from across the LWDAs. Over the years, other workforce programs (i.e., RESEA, apprenticeship grants, MSFW) have also included analysis of their aggregated review outcomes in the YIR. DWD plans to continue producing a YIR as support to regions to identify their performance relative to their peers, and to provide focus areas for training staff and to support their own monitoring activities. Aggregated monitoring information has helped inform new and updated DWD policies/technical assistance as well as impact DOL-DWD technical assistance on roundtable topics. DWD continues to explore opportunities for expanding the data and analysis provided in future editions of the YIR.

Assessment of One-Stop Partner Programs. Many partner programs are reviewed at the local level through DWD's routine annual compliance reviews in each of the LWDAs (see above), or through program-specific grant oversight, assessment, and monitoring conducted by individual programs. Over the past few program years, DWD's Compliance Team has incorporated concurrent monitoring of several Federal and State programs into its annual review process. As an

example, for PY2025-2026, several programs are included in the LWDA review process, such as Title I, Equal Opportunity, Apprenticeship grants, and Employer Training Grants. DWD utilizes available performance data along with detailed monitoring activities to comprehensively assess these programs. Each LWDA monitoring review includes analysis of local-level strategy and progress against the State and Local Plans. Comprehensive reports and corrective action plans, as applicable, are issued for each LWDA.

Partner programs such as Unemployment Insurance, Senior Community Service Employment Program (SCSEP), Migrant and Seasonal Farmworker (MSFW), Trade Act Programs, and Jobs for Veterans State Grants (JVSG) are housed within DWD and receive routine oversight activities conducted by staff who are not involved in program administration.

DWD conducts ongoing assessments through a program dashboard tool designed to monitor the volume of ongoing activities in our various workforce programs. This dashboard provides a look at both quarter-by-quarter data, as well as a historical year-over-year perspective. The historical perspective is critical and provides long-term insight into patterns and trends in activities, and the quarter over quarter perspective supports our efforts to impact activities throughout the year. A sample of this dashboard is included in 4.B.

Indiana's Legislative Services Agency (LSA) also conducts an annual review, analysis, and evaluation of Indiana's workforce-related programs to provide the general assembly with the information it needs to make informed policy choices about the efficacy workforce related programs. Specifically, IC 2-5-42.4-3 requires the LSA to conduct a systematic and comprehensive review, analysis, and evaluation of workforce related programs that includes information about each program that is necessary to determine if the goals of the program are being achieved. The annual review is to be conducted over a five-year cycle during which each program will be reviewed at least once on a schedule determined by the Office of Fiscal and Management Analysis, Legislative Services Agency (LSA). Additional evaluation requirements for the evaluation are outlined in IC 2-5-42.4-3(b).

Adult Education Assessment Strategies. To monitor and evaluate the quality of adult education activities, program management, fiscal management, data management, and performance measures are continuously assessed. Informal and formal monitoring, desk audits, data checks, and program visits are conducted by state central office staff, adult education coordinators, and the InTERS data team. Low performing programs are identified, in part, based on the accountability results described in section 116(b) of WIOA. Visits are made to low performing programs by the state team. Local programs develop professional development plans, target measurable skill gains to increase academic gains, and develop strategies to reduce student separations. Technical assistance and professional development are provided to further increase student success. Likewise, a comprehensive risk assessment is performed on all successful grantees from the Multi-Year Adult Education Competitive Grant Application (Request for Application) and the Multi-Year Integrated English Literacy & Civics Education Competitive Grant Application (Request for Application).

Based on these results, a number of adult education programs are selected for formal monitoring each year by a state monitoring team. Virtual and on-site monitoring visits are made to view records and classes, and to interview personnel. Formal reports are forwarded to local providers after site visits, and programs out of compliance are placed on corrective action plans. Programs are not released from corrective action plans until compliance is achieved, and satisfactory progress is reached. Technical assistance is provided, and professional development is customized for programs identified as low performing.

States negotiate yearly performance targets with the U.S. Department of Education, U.S. Department of Labor, Office of Career, Technical, and Adult Education with respect to the percentage of program participants who, during a program year, are in an adult education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains toward a credential or employment. Indiana requires providers of adult education to meet similar state negotiated WIOA metrics. Additionally, the state reviews the percentage of adults who are post-tested; the percentage of adults who exit the program without measurable skill gains; the percentage of adults who achieve measurable skill gains in distance education; and the percentage of adults who attain a high school diploma or equivalency.

At a minimum, State staff reviews program performance monthly and communicates to area providers efforts toward meeting local, regional, and State performance targets. The goal is continuous improvement. Performance is also monitored daily by the InTERS data team. Each provider and region see how they perform compared to the State and to the same time a year ago. To provide further transparency, the State broadcasts a monthly webinar that extensively covers these metrics and related performance standards. A coordinated series of professional development and technical assistance opportunities are offered to support these efforts. Funded programs employ professional development facilitators (lead teachers) who support and promote these targets. Lead teachers are required to monitor goals and provide quarterly reports to the professional development state team who analyze Indiana's strategies to meet these objectives.

In grant renewal years, funding is determined by past performance. A yearly performance scheduled is released at the start of each program year. The schedule outlines state priorities and performance accountability standards for future grant awards. Recent performance metrics included enrollment; measurable skill gains; high school diploma or equivalency; and certifications as core areas. Additionally, a companion schedule included Integrated Education and Training performance as a metric with focus on enrollments, completions, and certifications. To further prioritize performance metrics, the State has instituted a recognition initiative, 'Programs of Excellence'. This designation is built on federal performance benchmarks and state priorities offering a positive incentive to achieving all performance expectations set at the beginning of the program year. Approaching performance expectations and assessments from multiple perspectives reinforces Indiana's commitment to continuous improvement and a culture of excellence.

B. ***Previous Assessment Results***: *For each four-year state plan and state plan modification, provide the results of assessments of the effectiveness of the core programs and other one-stop partner programs and Combined State Plan partner programs included in the Unified or Combined State plan during the preceding 2-year period (i.e. the 2-year period of the plan modification cycle), in accordance with methods described in 4(A). Describe how the State is adapting its strategies based on these assessments.*

As discussed in 4(A), DWD utilizes a variety of assessment methods. Results of some of those assessments are discussed below:

Performance Assessments. Following the close of each program year, a performance assessment is completed to compare the estimated performance outcomes to the actual performance results for core programs. For the PY24/PY25 local performance negotiation cycle, DWD utilized a local statistical adjustment model (LSAM) to provide local areas with performance estimates, which were used to inform performance estimates. At the end of PY24 DWD conducted its first-year end performance assessment, utilizing the LSAM model that created the performance estimates for local areas.

During this year end assessment, an adjustment is made based on the actual performance and participant characteristics and economic conditions that took place over the program year. Each local area is provided with a local area performance assessment and is required to meet a 50% threshold for each individual WIOA measure and a 90% threshold for each overall program measure. In the event a local area fails to meet these required thresholds once the adjustment has been applied, DWD will take steps to provide formalized technical assistance that could include or require the development of a performance improvement plan or reorganization of the local board.

Monitoring Year-in-Review (YIR). The results of the most recent YIRs indicated several trending outcomes, both in opportunities for improvement and in noteworthy practices across the state. The YIRs provide a snapshot of aggregated data for all LWDAs for various review areas, such as the management and integrity of participant file information, case management practices, financial accounting, local WIOA governance, and equal opportunity. DWD agency and program leadership utilize the results of the YIR to assess areas in need of targeted technical assistance, policy development, or internal program improvement. LWDAs are expected to utilize the YIR to assess the same in local area practices, along with learning from other LWDAs and sharing best practices.

Federal Performance Assessment. The Federal Performance Measures are made available on the DWD Performance Portal at https://www.in.gov/dwd/performance/. The results of these performance measures drive conversations and collaboration among state and local partners to identify areas for improvement, to prioritize technical assistance, and to inform funding (e.g., funding to target specific metrics or state priority areas). The State met all its negotiated performance measures for PY23, in accordance with DOL's PY23 Annual Performance Assessment. While there were local areas that did not meet their negotiated measures, DWD

continues to work closely to identify areas for improvement. We do this through both mandatory and optional forms of technical assistance. For local areas that have failed at least one measure, technical assistance is required. For local areas that were successful, but may still have an interest in support, we do offer technical assistance. This assistance is focused on a data integrity review, where data validation and other trends in data reporting are reviewed to help identify where there may be specific opportunity for improvement.

C. **_Evaluation_**: *Describe how the State will conduct evaluations and research projects of activities carried out in the State under WIOA core programs; how such projects will be coordinated with, and designed in conjunction with, State and local boards and with State agencies responsible for the administration of all respective core programs; and, further, how the projects will be coordinated with the evaluations provided for by the Secretary of Labor and the Secretary of Education under WIOA (WIOA Section 116(e)).*

STATE EVALUATION PROJECTS

Legislative Services Agency (LSA) Reviews. As discussed in 4.A., Indiana's LSA conducts an annual review of workforce programs on a rotating five-year cycle. On a rotating basis, the report focuses on both core and non-core programs, covering each WIOA core program at least once every five years. For example, Wagner Peyser and WIOA Youth were reviewed in 2021; Adult, Dislocated Worker, and Vocational Rehabilitation were reviewed in 2020; and Adult Education reviewed in 2019 and 2024. These reviews offer insight into each workforce program that can be utilized by all stakeholders to ensure success of each program.

DWD EVALUATION PROJECTS

Evaluation Peer Learning Cohort. In 2023, Indiana was selected to participate in the 2023-2024 U.S. Department of Labor Evaluation Peer Learning Cohort (EvalPLC). Through this initiative, Indiana learned from peer states, experienced evaluators, and state and national subject matter experts. Indiana's participation focused on capacity and foundation building for conducting formal evaluations of workforce programs. Indiana's EvalPLC project team was designed to include a specific group of cross-divisional DWD and LWDA representatives with broad ranging WIOA experience touching all WIOA core programs. Individually, these representatives hold subject matter expertise in state and local strategy, policy, program operations, service delivery, data science, performance and quality, and partner collaboration. Experience with this project will allow DWD to build and solidify a framework for continued collaboration in these areas, better positioning DWD to design, initiate, and complete formal evaluation projects.

WIOA Title I Evaluations. Over the past two years, Indiana has made a concerted effort to strengthen WIOA Title I program evaluation, focusing on data-driven insights to improve program effectiveness and inform policy decisions.

Key Evaluation Initiatives

- Adult Priority of Service Evaluation: In alignment with recent DOL TEGL guidance, Indiana evaluated the impact of changes designed to increase the percentage of individuals served who face significant barriers to employment. This evaluation examined:

    o Program impact on wages and employment outcomes for priority populations.

    o How adjustments in service delivery influenced overall program performance and equity.

- Regional Map Analysis: In coordination with Indiana University, DWD conducted a comprehensive evaluation of the state's workforce region structure following Governor Braun's Executive Order (EO) requiring a review of regional alignment. This analysis assessed:

    o Economic and labor market data to determine if current regions reflect workforce realities.

    o Opportunities to improve service delivery and regional governance for better outcomes.

Future Focus

These evaluations represent the foundation for a broader evaluation strategy that leverages Indiana's growing data visualization capabilities (e.g., Tableau dashboards) to:

- Identify areas for deeper analysis based on real-time performance trends.

- Measure program effectiveness, return on investment (ROI), and population impacts.

- Inform continuous improvement and strategic resource allocation.

By combining rigorous evaluation methods with advanced analytics, Indiana is committed to ensuring all workforce programs deliver measurable value and improve outcomes for Hoosiers.

Wagner Peyser (WP) Service Delivery Model Analysis. DWD is also focusing efforts on evaluating its Wagner Peyser program as we work to implement the Final Rule. Beyond assessing compliance against any new requirements, we are also looking to enhance our WP service delivery model overall. In early 2024, DWD initiated work with the National Association of State Workforce Agencies (NASWA)'s Workforce Information Technology Support Center (WITSC) to assist with assessing Indiana's WP service delivery model. The project includes conducting a current-state assessment and gap analysis, with the end deliverable being recommendations for evolving DWD's

service delivery model. The goal of this work is to ensure a customer centric model with services delivered in the most effective and efficient manner.

The assessment was completed in September 2024 and the resulting framework was adopted. DWD continued its work with the NASWA WITSC team to develop an implementation plan. The critical components of the framework were implemented in 2025. We continue to refine our service delivery model through the use of feedback loops created to drive continuous improvement.

Title I Equal Opportunity and Nondiscrimination Data Analysis. Indiana's State Equal Opportunity (EO) Officer participates in DWD's WIOA Title I annual compliance reviews. The State EO Officer conducts annual compliance monitoring of each LWDA's progress in implementing and administering WIOA's Equal Opportunity and Nondiscrimination provisions, part of which includes an analysis of data and subsequent investigation, as necessary, of significant differences in populations receiving services. DWD conducts analysis of the standard deviation of U.S. Census workforce data compared to the population of WIOA enrolled participants the LWDA served in the prior program year.

The purpose of this analysis is to identify whether the LWDA is serving protected groups in its population to the expected level given the demographics of the communities it serves. The expectation is that the LWDA will investigate if the analysis identifies a large difference between numbers of people accessing WIOA Individualized Career Services (ICS) or Training Services (TS) in the LWDA's WorkOne offices and numbers in the community.

The formula used to conduct this EO data analysis identifies the standard deviation (SD) which is a measurement for how likely an outcome is due to random chance. The State EO Officer would expect the breakdown of individuals the LWDA serves to be representative of the breakdown of individuals in their communities. For the formula, zero indicates the expected outcome. We can assume that small changes (or a small SD) are due to random chance and that large changes are due to outside factors, such as potential discrimination. For this analysis, if the SD is greater than +2.0, we can assume that there is something influencing this difference because there is a less than 5% probability that this difference is due to random chance.

The State EO Officer's data analysis process includes review, discussion, and comparison with each LWDA as to the results of both state analysis and any analysis conducted locally. The following information and table below show an example of DWD's analysis for PY24 on a single local area. This LWDA's local results showed a high standard deviation, for the Asian, Hispanic, older population (age 55+), and females potentially being underserved in WIOA services. Similarly, the State EO Officer's analysis also showed the same categories as having a high standard deviation or potentially being underserved.

The left side of the chart provides the standard deviation between the region's PY2024 WIOA participants with the region's overall labor force as indicated by census estimates of employed and unemployed individuals. The right side of the chart compares the region's PY2024 WIOA participants with census estimates of numbers of unemployed individuals in the region. For this

analysis, if the SD is greater than +2.0, we can assume that there is something influencing this difference because there is a less than 5% probability that the difference is due to random chance.

EO Data Analysis for (LWDA Sample)					
PY24 Labor Force Data		Category	PY24 Unemployment Data		
Deviation	Probability of Potential Discrimination		Deviation	Probability of Potential Discrimination	
-1.13	No	Race: Black/African American	0.76	No	
3.04	**Yes**	**Race: Asian**	**5.32**	**Yes**	
2.03	**Yes**	**Ethnicity**	1.73	No	
7.80	**Yes**	**Age**	**6.73**	**Yes**	
-4.12	No	**Disability**	0.23	No	
2.59	**Yes**	**Gender**	**3.05**	**Yes**	
1.58	No	**LEP***	1.58	No	

*Census data provided by the 2023 American Community Survey 5 Year estimates; Census data does not break down this population into labor force and unemployment and so this is the entire population 18+.

Key takeaways from the above chart:

1. Asians participated in WIOA Title I at a lesser rate than expected when compared to both labor force and unemployment census data.

2. Individuals with Hispanic ethnicity participated in WIOA Title I at a lesser rate than expected when compared to labor force census data.

3. Older population (55+) participated in WIOA Title I at a lesser rate than expected when compared to both labor force and unemployment census data.

4. Females participated in WIOA Title I at a lesser rate than expected when compared to both labor force and unemployment census data.

Federal Measures Dashboard. As discussed throughout this section, DWD also maintains a Federal Quarterly Performance Measures dashboard that enables staff and workforce partners to

quickly analyze years' worth of Local Area Reports in one location. This can also be viewed on the DWD Performance Portal at https://www.in.gov/dwd/performance/. This dashboard supports DWD's assessment and evaluation efforts.

VOCATIONAL REHABILITATION SERVICES EVALUATION

The Indiana VR program has developed a series of Tableau dashboards that are available to VR leadership and field management level staff. The data provides up-to-date information to support evaluation of compliance with federal and program standards, as well as review of progress on priorities and initiatives. Data can be reviewed at a statewide, regional, and individual staff performance level. Some examples include evaluation of rapid engagement efforts through review of the length of time between application and eligibility, and between eligibility and plan development; evaluation of discretionary grant and model demonstration projects; participant service spending trends; customer satisfaction; outcome data; state plan goals; pre-ETS trends; key performance indicators and a variety of other case statistics.

The VR program is conducting an evaluation of the Supported Employment Plus (SE+) model carried out through the Disability Innovation Fund Subminimum Wage to Competitive Integrated Employment model demonstration grant. This discretionary grant was awarded to Indiana in late 2022 by the Rehabilitation Services Administration. Indiana University, Indiana Institute on Disability and Community is serving as the contracted evaluator. The SE+ model establishes fidelity of supported employment services, and wraps around interventions of peer support services, family engagement, and enhanced benefits and work incentives counseling to individuals with disabilities pursuing competitive, integrated employment. VR is also collaborating with Mathematica who is serving as national SWTCIE evaluator under contract with RSA. VR provides regular reports of progress to the assigned RSA SWTCIE state liaison, along with regular updates to the Indiana Commission on Rehabilitation Services.

Additionally, VR engaged with Public Consulting Group to evaluate provider performance incentive payments implemented in August 2023. The evaluation was completed in 2025 and examined the effectiveness of incentive payments in increasing the quality and quantity of employment outcomes for VR participants served through community rehabilitation programs. Updates pertaining to the recommendations are being implemented in 2026.

Finally, VR engaged with PCG to support the development of the Comprehensive Statewide Needs Assessment in 2025. Survey instruments were developed and distributed to participants and others with disabilities, VR staff, providers, businesses, and other stakeholders, while focus groups were conducted with participants, staff, and providers. Surveys and focus groups were designed to obtain feedback from individuals with disabilities, staff, and stakeholders regarding areas of improvement and service gaps. RSA-911 data was also reviewed to assess VR performance over the three prior years to identify areas of strength and areas that could be improved. The CSNA was completed in early 2025 and shared with RSA, with relevant informational summaries included in

the updated state plan submission. The Commission on Rehabilitation Services provided input on the CSNA process and survey instruments as well as identification of priority areas. The CSNA priority areas are summarized in the VR section of the State Plan.

5. ***Distribution of Funds for Core Programs***
    a. ***For Title I programs****: Provide a description of the written policies that establish the State's methods and factors used to distribute funds to local areas for-*
        i. *Youth Activities in Accordance with WIOA Section 128(b)(2) or (b)(3)*

The State follows section 128(b)(2)(A)(i) and TEGL 11-24 to formula allocate funding for youth activities. DWD communicates formula allocations on an annual basis. The most recent allocations memo (DWD Memo 2024-14), along with prior allocations memos, can be found at: https://www.in.gov/dwd/compliance-policy/policy/active/. The data used in computing allotments includes:

- The number of unemployed for Areas of Substantial Unemployment (ASUs) averages for 12-month period immediately preceding new program year as provided by the Bureau of Labor Statistics;

- The number of excess unemployed individuals or the ASU excess (depending on which is higher), averages for the same 12-month period as used for the ASU unemployed data; and

- The number of economically disadvantaged youth (age 16-21, excluding college students in the workforce and military) from special tabulation data available from the American Community Survey (ACS).

The State applies the 90% hold harmless provision contained in WIOA, Section 128(b)(2)(A)(ii).

        ii. *Adult and Training Activities in Accordance with WIOA Section 133(b)(2) or (b)(3)*

The State follows section 133(b)(2)(A)(i) and TEGL 11-24 to formula allocate funding for adult activities. DWD communicates formula allocations on an annual basis. The most recent allocations memo (DWD Memo 2024-14), along with prior allocations memos, can be found at: https://www.in.gov/dwd/compliance-policy/policy/active/. The data used in computing allotments includes:

- The number of unemployed for Areas of Substantial Unemployment (ASU's) averages for the 12-month period immediately preceding new program year, as provided by the Bureau of Labor Statistics;

- The number of excess unemployed individuals or the ASU excess (depending on which is higher), averages for the same 12-month period as used for the ASU unemployed data; and

- The number of economically disadvantaged adults (age 22-72, excluding college students in the workforce and military) from special tabulations of data available from the American Community Survey (ACS).

The State applies the 90% hold harmless provision contained in WIOA, section 133(b)(2)(A)(ii).

iii. *Dislocated Worker Employment and Training Activities in Accordance with WIOA Section 133(b)(2) and Based on Data and Weights Assigned*

The State follows section 133(b)(2)(A)(i) and TEGL 11-24 to formula allocate funding for Dislocated Worker activities. DWD communicates formula allocations on an annual basis. The most recent allocations memo (DWD Memo 2024-14), along with prior allocations memos, can be found at: https://www.in.gov/dwd/compliance-policy/policy/active/. The following data is used in computing these allotments:

- Insured Unemployment Data for the preceding Calendar Year (30% weight);

- Unemployed Concentration Data for the preceding Program Year (30% weight);

- Plant Closing and Mass Layoff Data for the preceding Calendar Year (15% weight);

- Declining Industries Data for the preceding Calendar Year (10% weight);

- Farmer/Rancher Economic Hardship Data for the preceding Calendar Year (2% weight);

- Long-term Unemployment Data for the preceding Calendar Year (13% weight).

The State Workforce Development Board will examine how this weighting impacts local distribution and if adjustments are needed. The State applies the 90% hold harmless provision contained in WIOA, section 132(b)(2)B)(iii).

B. **For Title II**:

i. *Describe the methods and factors the eligible agency will use to distribute title II funds.*

The Indiana Department of Workforce Development (DWD) solicits applications and proposals from entities eligible to receive WIOA Title II funds. Applicants can apply for funding in several areas that include adult education and literacy activities – WIOA Title II (per 29 USC §3272); adult high school credit program/competency-based high school diploma program/adult secondary credit

(ASC); corrections education and education for institutionalized individuals; integrated education and training activities (IETs); workforce education initiative (WEI); and/or Indiana online only distance education.

An eligible individual is an individual who is 16 years of age or older; who is not enrolled or required to be enrolled in secondary school under State law; who is basic skills deficient; does not have a secondary school diploma or its recognized equivalent and has not achieved an equivalent level of education; or is an English language learner.

DWD competes funds in accordance with 34 CFR section 463 Subpart C.

To be awarded WIOA Title II funds in Indiana, applicant organizations must be an eligible provider as defined by WIOA (per 29 USC §3272). An applicant must be able to demonstrate past effectiveness in providing adult education and literacy activities before the applicant can be considered an eligible applicant. Data which demonstrate the applicant's effectiveness in providing adult education and literacy services include evidence of eligible individuals' academic gains (reading, writing, mathematics, or English language acquisition), employment outcomes, family literacy, attainment of secondary credentials, transitions to postsecondary education, and workforce training.

Application materials include a separate data collection tool to ensure how past effectiveness is determined so that all eligible providers are treated fairly in grant competitions. Applicants that do not have performance data under WIOA section 116 may demonstrate previous effectiveness in servicing basic skills deficient eligible individuals, including evidence of success in achieving the outcomes listed above. In the case of applicants applying as a consortium, each member of a consortium must provide performance data to demonstrate effectiveness. Application materials clearly identify how many years of demonstrated effectiveness data an applicant must submit in the application.

Indiana conducts its review of applicant eligibility to determine if an application is from an eligible provider of demonstrated effectiveness by utilizing a "yes" or "no" determination. The State screens each application to determine if it is from an eligible provider of demonstrated effectiveness and only applications that are determined to be from eligible providers of demonstrated effectiveness are forwarded for review, scoring, and consideration for funding. Similarly, all sub-recipient members must be determined to be an eligible provider of demonstrated effectiveness in order for the consortium application to be forwarded for review, scoring, and consideration for funding.

Applicants that are determined to be ineligible for funding because they were not determined to be eligible providers of demonstrated effectiveness are notified.

In the State's multi-year adult education competitive grant application (request for application), all applicant organizations should complete all questions listed under each consideration (I-XIII, XIV) regardless of the type(s) of funding the applicant is seeking. All applicant organizations should address Consideration XIV [General Education Provisions Act (GEPA)]. Considerations I-XIII

represent the thirteen statutory considerations DWD must consider when awarding WIOA Title II funds, while Consideration XIV, which is state-imposed, is used to meet the statutory GEPA plan required for all AEFLA funded sub-recipients. The State may also require additional State considerations to be completed. Failure to provide answers for the narrative portion of the application is grounds for non-consideration.

To fund eligible providers, a rubric is utilized to score the narrative section for the thirteen considerations. Review teams utilize a 0–5-point Likert Scale to score the quality of each response. Reviewers provide notes or commentary to justify the score, provide brief details of what the applicant omitted or missed, and brief descriptions of anything "positive" about the application.

5 – Excellent; Applicant's response clearly demonstrates an understanding of the question, the consideration, and the challenges and expectations of an adult education provider.

4 – Good; Applicant's answer does a good job of generally providing support for its claims and demonstrates what would be expected out of a good adult education provider.

3 – Adequate; Applicant's response demonstrates some understanding, though this understanding may have to be inferred, of the question, consideration, and the challenges and expectations of an adult education provider.

2 – Poor; Answer is not well supported and does not demonstrate what would be expected out of an adult education provider.

1 – Bad; Answer lacks any context or support, and in no way demonstrates what would be expected out of an adult education provider.

0 – Incomplete; Applicant made no attempt to answer the question.

DWD utilizes overall scores, quality of grant submissions, and responses to the thirteen considerations and any State considerations to fund eligible providers. Additionally, the State reviews funding requests and proposed service delivery areas to ensure that every county in the State is covered.

DWD awards multi-year adult education grants on a competitive basis, beginning with program year 2024 (July 1, 2024, through June 30, 2025), and ending PY2029 (July 1, 2029, through June 30, 2030). After the initial year of this multi-year adult education grant award (PY2024), DWD requires sub-recipients apply for the renewal of funding through a non-competitive grant continuation for the following program years: PY2025; PY2026; PY2027; PY2028; PY2029.

Funding is allocated and distributed at the state level as prescribed by Title II, Adult Education and Family Literacy Act (AEFLA):

1. Not less than 82.5 percent of the grant funds are dedicated for awards under section 231 and to carry out section 225, Programs for Corrections Education and Other Institutionalized Individuals, of which not more than 20 percent is available to carryout section 225;

2. Not more than 12.5 percent of the grant funds are applied to carryout state leadership activities under section 223; and

3. Not more than five percent of the grant funds are set aside for administrative expenses of the eligible agency.

In making initial award determinations during the first year of a multi-year grant, DWD will take into consideration each applicant's:

1. Accomplishments and progress toward goals;

2. Capacity and efficiency in service delivery;

3. Gaps and barriers that limit participation; and

4. Employment and labor market demands.

Based on state priorities, funding is prioritized and grants are awarded, in part, to:

1. Organizations that have demonstrated effectiveness in improving the literacy of eligible individuals, especially participants who have low levels of literacy;

2. Organizations with services that are aligned with local workforce strategies, priorities, and partners; and

3. Organizations with services that are responsive to the needs of persons with barriers to employment.

Total funding requested may vary depending upon program size, population (anticipated enrollment), demonstrated need, capacity, and number of subgrants within a service area. DWD distributes funding based on this review, attempting to fund as many applicants meeting minimum benchmarks in each area. State statute requires that at least 25 percent of the funding appropriated by the general assembly for adult education and literacy activities be used for workforce programming.

DWD reserves the right to award grant funds in amounts different from the applicant's initial budget request. Adjustments may be based on how the proposed budget and budget narrative covers program expenses and whether the requested amount is proportionate to the number of participants projected or previously served based on previous performance.

For DWD to maintain the federally required Maintenance of Effort (MOE), Indiana requires that WIOA-funded Adult Education providers contribute a local match.

In continuation years, the allocation of funds takes into account past performance as a basis for an increase or decrease in funds. Considerations include enrollment, measurable skills gains, high school equivalency attainment, and the number of industry-recognized credentials attained by students. Providers that achieve all or a percentage of state-defined performance goals may also qualify for additional funding for outstanding performance during a program year.

DWD reserves the right, prior to the finalization of awards, to make adjustments that support fair and equitable access to services. Applicants may be provisionally awarded funds. Providers may also receive technical assistance and professional development to improve program performance and may be required to submit a Corrective Action Plan (CAP).

Final budgets may be negotiated and all subgrants are contingent and may change based on federal and state appropriations.

Other Requirements: Increased collaboration between Indiana Adult Education grant recipients and the local workforce development boards (LWDBs) is encouraged. The grant requires that LWDBs have an opportunity to review all applications submitted to DWD that propose to offer services within the local workforce development area. In Indiana's RFA, entities must describe how the applicant plans to continually align its services with the workforce development regional plans (local plans) must also be included. The applicant organization's relationship with the one-stop partners in the communities where it is applying for funding and how the applicant organization intends to work with one-stop partners to ensure the efficient delivery of adult education and literacy services to eligible individuals must be addressed. This includes plans for co-enrollment, referral services, and infrastructure costs.

Any recipient of funds awarded must provide reasonable accommodations to all qualified individuals (both employees and students) with disabilities unless that accommodation would represent an undue burden in the exercising of the responsibilities of the sub-recipient to deliver adult education and literacy activities. Accepting an award is an acknowledgement that the grant recipient is following the Americans with Disabilities Act. Applicants are also required to acknowledge compliance with the General Education Provisions Act (GEPA).

> *ii. Describe how the eligible agency will ensure direct and equitable access to all eligible providers to apply and compete for funds and how the eligible agency will ensure that it is using the same grant or contract announcement and application procedure for all eligible providers.*

DWD ensures equitable access to apply for grants or contracts to all eligible providers in Indiana. The processes used for announcing the availability of federal funds under Section 231, 225, and 243, and is designed in such a way that no distinction is made in the type of eligible provider.

Announcements about the grant process are posted to DWD's website and email notifications are sent to current providers and a mailing list of interested contacts, including entities requesting further information. Announcements are made about the competitive grant Request for Applications (RFA) on monthly statewide webinars and posted on DWD's website for further review. Town hall meetings take place regionally to inform potential applicants of the grant process and timelines. The PowerPoint from town hall meetings is posted along with Frequently Asked

Questions (FAQs). FAQs ensure that all parties have equitable access to view questions and responses. FAQs are further highlighted in a statewide webinar and posted to DWD's website.

Within the grant application, eligible agencies must submit metrics regarding their ability to effectively serve the Title II target population. For current Title II providers, this must be WIOA metrics. For eligible providers not currently WIOA Title II providers, metrics must be submitted that align as closely as possible to WIOA performance outcomes. Levels for demonstrated effectiveness are set by Title II staff and are set as a percentage of current performance expectations. The application process used to award funds for comprehensive adult education providers is the same for all eligible applicants.

Non-adult education staff are included in the scoring process as grants are reviewed. Where possible, other adult education staff from other states may serve as evaluators as well. LWDBs review eligible providers' application materials to determine whether the applications are consistent with local plans. Upon completing this review, the LWDB submits a recommendation to DWD to promote alignment with the local plan. Prior to awarding contracts, DWD may require applicants to revise the sub-recipient proposals, including changes that better align services provided by the sub-recipient with LWDBs.

> C. ***Vocational Rehabilitation Program***: *In the case of a State that, under section 101(a)(2)(A)(i) of the Rehabilitation Act designates a State agency to administer the part of the Vocational Rehabilitation (VR) services portion of the Unified or Combined State Plan under which VR services are provided for individuals who are blind, describe the process and the factors used by the State to determine the distribution of funds among the two VR agencies in the State.*

N/A

6. *Program Data*

> A. ***Data Alignment and Integration***: *Describe the plans of the lead State agencies with responsibility for the administration of the core programs, along with the State Board, to align and integrate available workforce and education data systems for the core programs, unemployment insurance programs, and education through postsecondary education, and to the extent possible, the Combined State Plan partner programs included in this plan. The description of the State's plan for integrating data systems should include the State's goals for achieving integration and any progress to date.*

Describe data-collection and reporting processes used for all programs and activities, including the State's process to collect and report data on co-enrollment, and for those present in the one-stop centers.

> i. *Describe the State's plans to make the management information systems for the core programs interoperable to maximize the efficient exchange of common data elements to support assessment and evaluation.*

The Education & Workforce Development (EWD) database, housed within Indiana's Management Performance Hub (MPH) creates enhanced opportunities to combine workforce and education data (K-12 and higher education) to examine employment outcomes, retention of graduates, differential outcomes based on degree type and area of study and a wide range of other research to better understand the linkages between education and the workforce. This longitudinal dataset, supported by the NCES State Longitudinal Data Systems Grant, is combined to answer key questions about the education and workforce pipeline. It allows stakeholders such as education professionals, employers, policymakers, students, community leaders, and the public to use data and information previously not available. Partner agencies include the Indiana Commission for Higher Education (CHE), the Indiana Department of Education (IIDOE), the Department of Workforce Development (DWD), and the Family and Social Services Administration (FSSA). EWD does not replace agency data collection and administration responsibilities; rather, it serves as a clearinghouse where specific data elements are linked across the four agencies. With the solid foundation of Indiana's EWD system resting on the collaboration of multiple State agencies, the mandate for cross-agency data management and analysis that is part of MPH's charter, MPH's human capital and expertise, and a system that has been refined over the last few years, Indiana is in a good position to take its P-20 data system to the next level.

An example of this work involves a collaborative project where the former GWC, the Indiana Charter School Board (ICSB), and DWD worked to develop a secondary shared data template to have longitudinal reporting on adult secondary providers. This would involve MPH EWD reporting for Workforce Diploma and Adult High Schools.

In 2023, the Indiana Department of Education launched the Graduates Prepared to Succeed Dashboard2. The dashboard includes metrics from Pre-K to high school graduation and beyond. Education and workforce data housed within the dashboard use data powered by the EWD to provide increased transparency with the goal of empowering Indiana's educators, families, communities, and employers. The Indiana GPS dashboard seeks to: provide educators with a variety of essential data points to support continuous improvement of student learning across the K-12 continuum, support families and community stakeholders by providing meaningful, relevant, and transparent information about school progress and performance, and elevate the highest-performing schools as models of excellence and identify other schools for additional support.

As evidenced by its use from policy makers and researchers, the MPH EWD has achieved a critical mass of linked data that can be usefully mined for insights regarding trends and outcomes to support assessment and evaluation of core programs. The secondary shared data template will provide leadership the ability to apply performance measures that align across agencies and programs, providing the State the ability to track outcomes not currently reported like completion of employability skills curriculum or levels of credential attainment.

> ii. *Describe the State's plans to integrate data systems to facilitate streamlined intake and service delivery to track participation across all programs included in this plan.*

It is Indiana's goal to continue to evaluate service delivery systems, seeking opportunities to streamline intake and track participation where possible to improve the overall experience and efficiency with which Hoosiers receive workforce services. While there are benefits to a unified system for intake and tracking of participation, at current state there are complex systems already in place across core partners to process, track and report participate level data. As opposed to a fully unified system for intake and tracking of participation, we are rather exploring a series of systems that are built with integrations designed to share the appropriate data, at the appropriate time, to enhance referrals, opportunities for co-enrollment and ultimately program outcomes.

As evidence of this forward progress, Indiana is pursuing a system integration between our Title I & III Case Management System and our Title II Adult Basic Education System. This integration is being designed to send participant level data from our Title II Adult Basic Education System to our Title I & III Case Management System. This will help us to identify where co-enrollment is already present as well as where there may be opportunities for co-enrollment where there are not. In addition to co-enrollment, this integration also aligns the data sources for quicker access and analysis.

Indiana has already taken significant steps toward system alignment in our services to employers. Core partners across Title I, II, III, and IV have a single source of access to a system that tracks engagement with employers. This approach ensures that a unified approach to serving employers across programs can be taken. Additionally, it supports a historical view on activities with employers and their engagement with WIOA programs. The single source of access for reporting and tracking engagement allows for greater efficiency in accessing and analyzing data across programs. As we look ahead to the next four years, our goals will be focused on enhancements to policies and procedures across programs that support data entry and service delivery.

In addition to the above examples, Indiana has also done system integrations between our UI systems and our Customer Relationship Management System that are designed to target outreach and track referrals for programs such as VETS and TAA. These integrations foster greater connectivity and allow us to deploy strategies that might traditionally be more manual processes. With these integrations in place, we are also able to track elements like success of referral.

While system integrations have been a priority for Indiana to better align data sources and conduct analysis, we are also focused on a learning management system designed to house training modules that support the transfer of knowledge among the core WIOA programs. All WIOA core programs have access to this platform where content can be shared and accessed.

> iii. *Explain how the State board will assist the governor in aligning technology and data systems across required one-stop partner programs (including design and implementation of common intake, data collection, etc.) and how such alignment will improve service delivery to individuals, including unemployed individuals*.

The SWDB will review the GWC's prior involvement in supporting work surrounding the comprehensive longitudinal data system within MPH's Education & Workforce Development (EWD) database. Indiana will continue to make improvements on the data elements that are a part of the EWD and more broadly within MPH with the long-term goal for comprehensive reporting with streamlined data governance and accessibility through one State agency rather than through multiple partner agencies and programs. Intake processes and systems are being reviewed to ensure that Hoosiers are being served in the most advantageous way utilizing the strategies in the plan to ensure alignment of activity and resources while meeting information privacy standards where applicable.

> iv. *Describe the State's data systems and procedures to produce the reports required under section 116, performance accountability system. (WIOA section 116(d)(2))*.

The State's current infrastructure is positioned to meet WIOA reporting requirements. Through collaboration with the vendor of Indiana's case management system, necessary data files are configured on a quarterly basis for federal reporting and submitted to DOL's Workforce Integrated Performance System (WIPS). Prior to submission, files are analyzed for data consistency and vetted using internal queries and tracking reports. All reports are approved by DWD for certification and reviewed by DWD staff.

Indiana core partners continue to work toward improving the process via modified data sharing mechanisms and reporting protocols. There are multiple State agencies in Indiana that have administrative responsibility for the WIOA core programs. These include both the Indiana Department of Workforce Development (DWD) and Family and Social Services Administration (FSSA) Bureau of Rehabilitation Services (BRS). While each of these entities maintains separate participant and financial information systems, the agencies continue to work collaboratively to integrate data across Indiana's workforce development system.

Indiana's CMS is based on federal requirements to collect the data for reporting for Title I and III programs. Each week, the PIRL files are produced. On a quarterly basis, DWD reviews the data in the files and checks for data issues. A list of issues or missing data is sent to the respective regions to be corrected in the CMS. The State publishes final reports online to provide multiple years of historical performance data. Employer indicators are submitted as one file for all WIOA titles. DWD submits the Employer Indicators for both DWD (WIOA Title I, II, and III) and FSSA and DWD uploads validated data to WIPS. FSSA provides the required information to DWD which is combined with DWD's data and then submitted through WIPS.

> B. ***Assessment of Participants' Post-Program Success****: Describe how lead State agencies will use the workforce development system to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing postsecondary education, or entering or remaining in employment. States may choose to set additional indicators of performance.*

Adult and Dislocated Worker Programs: All program participants receive follow-up services for a minimum duration of 12 months after exit, as follow-up services may continue to be provided beyond that time at the State or local Board's discretion. Follow-up allows staff to continue the relationship with the participant by offering additional services and collecting valuable information related to the participant's progress after exiting the program, including employment status, educational progress, need for additional services, and problems and challenges occurring, and assistance needed to address them. The details from these follow-up engagements are captured in the case management system and can be extracted and analyzed to better understand post program success of participants.

Youth Program Follow Up: All youth program participants receive follow-up services for a minimum duration of 12 months after exit, as follow-up services may continue to be provided beyond that time at the State or LWDB's discretion. Follow-up allows staff to continue the relationship with the youth by offering additional services and collecting valuable information related to the participant's progress after exiting the program, including employment status, educational progress, need for additional services, and problems and challenges occurring, and assistance needed to address them.

Adult Education: The State's adult education coordinators host regional consortium meetings to discuss goals toward meeting performance accountability standards and to assess the progress of participants who are exiting from core programs in entering, persisting in, and completing post-secondary education or entering or remaining in employment.

Consortium meetings bring together partners, including LWDBs, WorkOnes, one-stop operators, and adult education leadership, to establish goals, review progress, and follow-up on items as needed. The State is required to report employment in the second and fourth quarter after exit for all providers, as well as postsecondary credential and/or degree attainment. In addition to local

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program reports, the State data match employment from wage records from DWD and postsecondary attainment from the Indiana Commission for Higher Education (CHE) to determine and evaluate success. Indiana recognized a performance challenge with employment metrics in PY23. After review and analysis, it was determined that the wage data match percentage had decreased over the prior year reducing the ability to obtain employment data with students. The State team implemented multiple intervention strategies to address this shift. The first strategy was an increased shift on student data capture. As digital registration has become more commonplace, students were less likely to input their social security number in initial registration phase. This was addressed by confirming the ability to accept the last four digits of the SSN as a viable form of identification in addition to providing programs with the students who lacked this information allowing them to connect with students prior to leaving the program. The second strategy was to implement a digital version of student employment follow up through the Indiana data system. This function allows programs to run a report based on student cohorts as they enter the 2nd and 4th quarter after exit cohorts. This functionality not only identified students but added an e-mail option to reach out to the students lacking information. Once a student record was updated with employment information, the student was then dropped from the report. The third strategy was increased communication and technical assistance around the employment performance metrics. As previous benchmarks were achieved through data matching only, it required a communication strategy to increase the awareness and prioritization of employment outcomes as a primary performance consideration for the field. All these strategies together have created an increase in data collection and employment outcomes for the primary 2nd and 4th quarter after exit metrics.

The State requires that adult education applicants employ one or more academic and career coaches. Adults often enter programs with multiple barriers and student persistence can be erratic. Academic and career coaches help students overcome their barriers by offering a greater chance that their experience in adult education and beyond is successful. While career pathways should offer multiple on and off ramps, students have greater opportunities within this framework to improve skills in reading, mathematics, and language; attain a high school or equivalency diploma; earn an occupational certificate for employment; and prepare for college and further training.

In adult education, Integrated Education and Training provides opportunities for short-term training and certifications in in-demand industries for employment. Indiana reviews and approves each application separately to ensure it meets these priorities. Integrated Education and Training is defined as a service approach which provides adult education and literacy activities simultaneously and contextually with workforce preparation activities and workforce training for a specific occupational cluster. Additionally, Indiana will require adult education providers applying for funds to address whether and to what extent a program plans to provide access to pre-apprenticeship programs and how the program plans to connect students exiting adult education with access to apprenticeship programs.

Meanwhile, the Workforce Education Initiative targets employers with workers who possess basic skill deficiencies and desire to maintain their jobs or improve performance. Indiana and local adult

education programs will continue to frame a coordinated workforce basic skills system that is worker-centered, customized, and provided at the workplace or off-site. This project continues to support employers in hiring and retaining workers who will be able to meet demands for productivity, safety, and advancement, as well as serve as an additional assessment of participants' post-program success.

*C. **Use of Unemployment Insurance (UI) Wage Record Data**: Explain how the State will meet the requirements to utilize quarterly UI wage records for performance accountability, evaluations, and as a source for workforce and labor market information, consistent with Federal and State law. (This Operational Planning element applies to core programs.)*

Indiana's Research and Analysis Data Warehouse and longitudinal data systems currently integrate and match UI wage records for employment outcomes and performance accountability reporting. This same system (RADW) has been used for additional labor market information analysis supporting the Bureau of Labor Statistics programs and to inform the labor market information website, tools, and ad hoc research questions. The DWD Performance Reporting and Data Integrity unit also uses UI Wage Record Data for Federal Performance Metrics and other programmatic evaluations and analyses upon request.

Only individuals within the allowed categories are allowed to see individual confidential UI data and only aggregate UI data is shared with anyone not allowed by UI Confidentiality laws to access. This is accomplished in part by use of SWIS Agreement in allowing access and the sharing of UI data.

*D. **Privacy Safeguards**: Describe the privacy safeguards incorporated in the State's workforce development system, including safeguards required by section 444 of the General Education Provisions Act (20 U.S.C. 1232g) and other applicable Federal laws.*

Indiana recognizes that a key element to utilizing data across agencies for either improved customer service or improved measurement and tracking of outcomes is ensuring the integrity of all data. This is accomplished with various technical safeguards and ensuring personnel handling this data are properly trained in all relevant regulations and the fundamentals of handling personal and confidential data. Technical safeguards include:

- Approved processes that limit access to the data to only those personnel who require access to carry out their daily job functions;

- Network security, monitoring, firewalls, etc. to prevent unauthorized access to data from entities outside of State government;

- Encryption technology; and

- Secure data transport mechanisms.

All State personnel undergo annual training on the proper handling of confidential data. This training is updated to reflect the most current statutes and interpretations of confidentiality statutes and regulations. Those specifically involved in reporting are trained regarding the various de-identification and aggregation rules that apply. All individuals with access to protected information must also follow agency guidance on appropriate sharing and storage of data.

7. *Priority of Service for Veterans*

A. Describe how the State will implement the priority of service provisions for covered persons in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor.

B. Describe how the State will monitor priority of service provisions for veterans.

C. Describe the triage and referral process for eligible veterans and other populations determined eligible to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist/Consolidated Position.

Indiana's WorkOne offices are required to ensure that Priority of Service for Veterans and Eligible Spouses is observed. DWD's policies and guidance support federal requirements, including but not limited to those outlined in federal regulations, Title 38 U.S.C., VPL 07-09, and TEGL 10-09. DWD's current policies can be found at https://www.in.gov/dwd/compliance-policy/policy/active/. DWD Policies 2024-06, 2019-04 Change 3, and 2015-08 provide additional definitions of the populations of eligible veterans to be served by the one-stop delivery system partners.

It is important to note that the definition of a veteran in the Jobs for Veterans Act (JVA), the Priority of Service regulations and TEGL 10-09 differs from the definition of veteran that applies to reporting of Wagner-Peyser services and to eligibility to receive services from a Disabled Veterans' Outreach Program (DVOP) specialist. The veteran definition that requires the individual to have over 180 days of active service still applies to Wagner-Peyser reporting and to eligibility for DVOP but does not apply to priority of service. It is the responsibility of the program operator to ensure that policies and procedures and staff training reflect the correct eligibility definition.

B. Describe how the State will monitor priority of service provisions for veterans.

The JVSG State Veteran Program Director (SVPD), Veteran Program Support Specialists (VPSS), and WorkOne management hold monthly meetings to ensure services to veterans are provided in accordance with the law and that priority of service provisions are appropriately implemented.

DWD Policy 2015-08 specifically describes priority of service for veterans and eligible spouses in Indiana's WorkOne/AJCs, and DWD's internal reviews ensure that all offices adhere to this policy.

DWD's Program Administration & Oversight's Compliance Team conducts annual internal reviews to assess compliance with DWD Policy 2019-04, Change 3 and DWD Policy 2015-08. These internal reviews are conducted in conjunction with LWDAs' annual WIOA monitoring reviews. These reviews include testing the LWDA service provider staff's knowledge on how to identify veterans and their eligible spouses and ensure that they receive priority of service as prescribed in policy.

The DWD Compliance Team interviews all staff positions that interface, or have the potential to interface, with veterans/eligible spouses. DWD Wagner-Peyser and service provider staff working as greeters in WorkOne/AJCs are interviewed to learn about how they assess individuals coming into the office and the types of questions they ask to identify veterans/eligible spouses. These conversations include asking about how greeters determine when a veteran/eligible spouse should be referred to a DVOP and how those referrals are made when a DVOP is or is not physically in the office. DVOPs are also interviewed and asked about how individuals are referred to them, how they assess individuals' eligibility for services, and how veterans/eligible spouses' service plans differ from non-priority of service groups. DVOPs are also asked how individuals experiencing qualifying employment barriers (QEB) are identified and who would benefit from co-enrollment in WIOA and JVSG programs. Both greeters and DVOPs are asked about the last time they received JVSG training. Monitors also talk with Local Veteran Employment Representatives (LVERs) about their job duties and how they advocate for veteran employment at community and employer events.

In addition to conducting interviews, program monitors use the state's web-based case management system, Indiana Career Connect, to select and review a sample of veterans/eligible spouses proportionate to the number of veterans/eligible spouses receiving services in that particular region. Program monitors validate eligibility and assessment documentation, Individual Employment Plans, and case notes supporting services delivered. A sample of LVER records are also reviewed to validate that activity codes support documented visits and/or promotional calls made to employers. Issues identified through these review activities are shared with DWD JVSG leadership in an exit conference and incorporated into internal review reports with recommendations for improved service delivery.

Finally, as part of their routine internal JVSG reviews, program monitors also walk through the WorkOne offices and check for the required signage notifying veterans/eligible spouses that they should receive priority of service.

JVSG leadership has requested that Compliance Team staff involved in JVSG internal reviews participate in quarterly roundtable discussions held with all DVOPs and LVERs to share aggregated review outcomes and provide support with any problem areas identified.

Additionally, DWD supports further coordination with other veteran-focused and veteran-community service organizations, including the Indiana Department of Veteran Affairs (IDVA),

which serves as a coordinating body across the local government for resources and support available to veterans.

C. Describe the screening and referral process for eligible veterans and other populations determined eligible to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist/Consolidated Position.

In screening and referring veterans and other populations determined eligible to receive services from JVSG's DVOP specialists, DWD adheres to priority of service requirements outlined in federal regulations, Title 38 U.S.C., VPL 07-09, and TEGL 10-09. These requirements are also included in DWD Policies 2024-06, 2019-04 Change 3, and 2015-08.

With respect to any qualified DOL employment and job training programs, veterans and other eligible populations shall be given priority over non-covered persons for the receipt of employment, training, and placement services, notwithstanding any other provision of the law. If services or resources are limited, the veteran or member of an eligible population receives access instead of or before the non-covered person. All WorkOne/AJC staff have been trained in federal requirements and local/state policy, which informs the screening and referral process.

Upon entering a WorkOne/AJC, customers have access to signage and resources explaining priority of services requirements. A staff member working as a greeter then asks the customer if they are a veteran or a member of an eligible population and provides information on priority of service requirements as needed. Priority of service requirements are also included in WorkOne/AJC marketing materials.

If a customer identifies as a veteran/member of an eligible population, they receive an initial assessment to determine if they will be referred to a DVOP and/or a WP/WIOA staff member for service delivery. All veterans who at the time of assessment self-attest to any of the identified QEBs mentioned in the various Veteran Program Letters (VPL) will be referred to a DVOP staff for further assistance.

All eligible veterans and covered persons will receive priority of service and be granted full access to any WorkOne program, workshop, resource and or funding in accordance with applicable laws, regulations, and state/local policies.

8. ***Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities****: Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners), will comply with section 188 of WIOA (if applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs, services, technology, and materials for individuals with disabilities. This also must include a description of compliance through providing staff training and support for addressing the needs of individuals with disabilities. Describe the State's one-stop center certification policy, particularly the accessibility criteria.*

Indiana's WIOA State-level Equal Opportunity (EO) Officer, appointed by the Governor, works within DWD's Program Administration and Oversight department with 100%-time commitment to equal opportunity and nondiscrimination in workforce programs. One of the primary duties of the State EO Officer is to develop and implement the federally mandated Nondiscrimination Plan (NDP). The NDP is a statewide plan for ensuring equal opportunity and nondiscrimination in the availability, access, and service delivery of WIOA Title I funded programs and services. The NDP must be updated and resubmitted to the U.S. Department of Labor Civil Rights Center (CRC) every two years, with Indiana's latest submission in September 2024. Indiana's NDP provides detail on physical and programmatic accessibility and can be found at: https://www.in.gov/dwd/compliance-policy/equal-opportunity/indiana-nondiscrimination-plan-ndp/. The next NDP updates are due to the U.S. Department of Labor CRC in September 2026.

Annually, the State EO Officer conducts subrecipient monitoring and data analysis regarding race, disability status, age, ethnicity, gender, and limited English proficiency. The data analysis compares participants to population data to evaluate potential under-service of a group. This process has promoted discussions between DWD and the LWDAs on how to increase services and outreach to under-served populations, including individuals with disabilities. As a result, new partnerships are targeted for the LWDAs to connect wrap around services. Further, the data analysis process has assisted the LWDAs in evaluating internal processes that may be prohibiting certain groups, such as those with disabilities, from participating in programs provided at the WorkOne Centers.

The State EO Officer ensures Indiana's LWDAs, sub-recipients, and workforce system partners are aware of, and in compliance with, the NDP and all section 188 responsibilities. Similarly, each LWDA has designated a LWDA EO Officer (Local EO Officer) to carry out these duties at the local level. All Local EO Officers also functionally report to the DWD State EO Officer on matters pertaining to Section 188.

Together, the State and Local EO Officers implement the NDP and continually review policies and practices. DWD Policy 2016-09, Change 1, Equal Opportunity and Nondiscrimination Guidance

Letter (see https://www.in.gov/dwd/files/activepolicies/2016-09-PC1_EO_Nondiscrimination_Guidance.pdf) outlines the major provisions of section 188 and 29 CFR 38. The agency has designed several training modules for Local EO Officers and staff, which can be found at https://www.in.gov/dwd/compliance-policy/equal-opportunity/eo-reference-materials/. Training modules relevant to physical and programmatic accessibility include, for example, the EO 101 and Compliance with Disability Nondiscrimination Requirements modules. In addition, training and resources are provided through Workforce GPS, an online technical assistance website sponsored by the Employment and Training Administration of the U.S. Department of Labor. Resources and training on disability, employment, accessible technology, and inclusion provide workforce development professionals (i.e., front-line staff) information and training on serving people with disabilities.

Programmatic Accessibility: Cross-training sessions have also occurred between DWD and VR covering topics such as disability etiquette, Order of Selection, and service coordination. Accessibility workstations are in place in WorkOne offices throughout the State. Title II pays for one-on-one interpreters for visual and hard of hearing individuals attending adult education programming. Testing accommodations are available for assessments as well.

The Equal Opportunity tagline is included on all external marketing and communication materials to allow people who are deaf and hard of hearing to make calls to each other, and with the assistance of the relay systems, users can communicate with people who do not have TTY systems. DWD and partner staff are knowledgeable on more advanced systems such as Video Relay Services and Video Remote Interpreting. The following sample tagline is below, and when necessary is translated into other languages:

The WorkOne System is an equal opportunity employer and does not discriminate in the programs and services offered. Auxiliary aids and services are available upon request to individuals with disabilities. The TDD/TTY number is 1-800-743-3333. Free language interpretation and translation services are also available upon request.

El Programa de Financiamiento asistido de acuerdo con el Titulo 1 de WIOA es un programa de Igualidad de Oportunidades de Empleo. Ayuda y servicios auxiliares están disponibles a solicitud para personas con discapacidad. El numero de TDD/TTY es 1-800-743-3333.

Additionally, DWD will continue to enhance the Jobseekers with Disabilities website (https://www.in.gov/dwd/job-seekers/job-seekers-with-disabilities/) to include resources for both jobseekers and employers.

Within the WorkOne centers, staff are trained to follow established procedures to ensure compliance. Starting with intake, staff are to ask every customer whether accommodations are needed. Customer and WorkOne office staff orientations include a discussion of Equal Opportunity (EO) and the right to file a complaint. Following orientation, services should be reviewed with the customer by determining the client's eligibility and need for services in an integrated setting. Ongoing training needs to occur to educate staff on the services, funding, and

the resources available to determine when it is appropriate to refer to partner agencies and co-enroll individuals in multiple programs, such as Vocational Rehabilitation, to access a greater service array to meet the individual's needs. Agency partners will seek to coordinate efforts and leverage funding between partner agencies to meet the employment and training needs of the customer.

Staff will also be trained to use multiple resources and tools to ensure accessibility to services. Additionally, one-stop assessments, Individual Education Program (IEPs), and Academic and Career Planning (ACPs) tools will continue to be utilized to identify career paths, barriers to employment, training or service needs, and employability skills. These assessments will also assist with identifying hidden disabilities and the potential need for accommodations.

All Comprehensive and Affiliate WorkOne offices undergo One-Stop Center Certifications every three years, with the next certification cycle due to be completed in the Spring of 2027. Certifications are conducted in accordance with DWD's One-Stop American Job Center Certification policy, https://www.in.gov/dwd/files/activepolicies/2020-09-P-C1-WIOA_One-Stop_AJC_Certification.pdf. Local EO Officers conduct annual accessibility compliance reviews of WorkOne operations and offices, including programmatic accessibility. Further, programmatic accessibility is evaluated on an annual basis by the State EO Officer and DWD's Compliance Team during routine WIOA monitoring.

Physical Accessibility: The One-Stop Center Certification process also includes evaluation of physical accessibility. Local EO Officers conduct accessibility compliance surveys of WorkOne offices checking the accessibility of various areas, such as parking, accessible routes, ramps, entrances and doors, signage, and restrooms. Accessibility compliance surveys are also conducted upon new office openings/moves and physical accessibility is a regular component of annual monitoring by the State EO Officer and DWD's Compliance staff.

WorkOne offices have some features to increase accessibility and availability of resources. WorkOnes have accessibility workstations with ergonomics, braille keyboards, and enlarging document capabilities (Ultra Magnifier) for the visually impaired. Workers also have capabilities with Microsoft Accessibility software for speech, hearing, and vision on all DWD computers, including read screens with a text- to-speech or braille displays. UI handbooks are accessible via computer on the DWD website and can be accessed with Microsoft's speech recognition and Magnifier. Additionally, the State EO Officer conducts quarterly meetings with all Local EO officers providing training, technical support, and best practices.

For further details regarding physical and programmatic accessibility, please refer to the NDP and DWD Policy referenced above.

9. ***Addressing the Accessibility of the One-Stop Delivery System for Individuals who are English Language Learners***: *Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials. Describe how English language learners will be made aware of the opportunity to enroll and/or co-enroll in all the core programs for which they are eligible.*

To help all clients better understand how to receive benefits and interact with the WorkOne system, DWD and its partners work to provide meaningful access to programs and activities by continually reviewing policy and practices to support limited English proficient (LEP) individuals. [DWD Policy 2016-09, Change 1, Equal Opportunity and Nondiscrimination Guidance Letter](#) outlines the major provisions of section 188 and 29 CFR 38. This policy was updated in May of 2025 for the purpose of expanding the EO Tagline to include "Free language interpretation and translation services are also available upon request." This tagline is required on all publications, broadcasts, and communications related to WIOA Title I. The agency has designed several training modules for Local EO Officers and staff, which can be found at https://www.in.gov/dwd/compliance-policy/equal-opportunity/eo-reference-materials/. Training modules relevant to language assistance services (LAS) include, for example, the Notice and Communication and Affirmative Outreach modules. Indiana's Nondiscrimination Plan (NDP) also covers LAS efforts (see https://www.in.gov/dwd/compliance-policy/equal-opportunity/indiana-nondiscrimination-plan-ndp/).

English Language Learners are made aware of free interpreting services upon entry into the WorkOne/AJC. Free interpreting service posters are posted at all entry points of the WorkOne locations in 35 languages for all core WIOA programs. Interpreting services are also made available in information sessions such as Rapid Response, Unemployment Insurance, RESEA, and WIOA Orientations. Job Postings are provided in English and Spanish and can be made available in all other languages.

Annually, the State EO Officer conducts subrecipient monitoring and data analysis regarding race, disability status, age, ethnicity, gender, and limited English proficiency. The data analysis compares participants to population data to evaluate potential under-service of a group. This process has promoted discussions between DWD and the LWDAs on how to increase services and outreach to under-served populations, including LEP individuals. As a result, new partnerships are targeted for the LWDAs to connect wrap around services. Further, the data analysis process has assisted the LWDAs in evaluating internal processes that may be prohibiting certain groups, such as those with limited English proficiency, from participating in programs provided at the WorkOne Centers.

WorkOne customers have access to interpreter services through an Indiana Department of Administration (IDOA) contracted language interpretation provider. The contract allows for in-

person interpretation of dozens of the primary languages spoken in Indiana. The contract also allows for phone interpretation services for additional languages not provided by in-person interpretation. In addition, Google Translate is now on the DWD website and on the Indiana Career Connect system.

The required "Equal Opportunity is the Law" notice (the EO Notice) is available in both English and Spanish, as Spanish is the most prominent non-English language throughout the State. In addition, copies of the EO Notice in both languages are typically posted in all WorkOne offices. Other languages available are Vietnamese, Burmese, Chinese, Haitian Creole, Hakha Chin, Marshallese, Swahili, Arabic, Bosnian, Cambodian, French, Hmong, Korean, Laotian, Russian and Braille. The EO tagline, as well as copies of the EO Notice and additional State and federal posters, such as the Unemployment Insurance and Migrant and Seasonal Agricultural Worker Protection, are provided in English and Spanish on DWD's website. Additionally, DWD has the Unemployment Insurance handbook available in Spanish, Burmese, Haitian Creole, and Arabic. This handbook is a great resource which explains the application process for Unemployment Insurance and what to expect when filing.

Additional LAS are provided at the LWDA level. Examples include, but are not limited to, bilingual staff, hand-held translators, English as a Second Language classes (offered through Title II), and Google Translate. To help LEP Hoosiers better understand how to receive benefits and interact with the one-stop system, Babel notices are provided along with communication of vital documents. Section 188 requires that a Babel notice be given when a client encounters a vital document, whether hard copy or electronic. A Babel notice is a short notice included in a document or electronic medium in multiple languages informing the reader that the communication contains vital information and explains how to access language services to have the contents of the communication provided in other languages. The Babel notice is now on the ICC system along with Google Translate.

Sample language for the Babel notice is below in English:

IMPORTANT! This document or application contains important information about your rights, responsibilities and/or benefits. It is critical that you understand the information in this document and/or application, and we will provide the information in your preferred language at no cost to you. Please contact your local Indiana WorkOne Office near you for assistance in the translation and understanding of the information in this document and/or application.

Other opportunities for LAS include classes offered through Title II Adult Education providers to help address language goals. One-stop partners can refer and co-enroll these constituents in the local Adult Education program for assistance.

In 2023, DWD established an Access Workgroup, with membership spanning across the agency in areas such as: Equal Opportunity, IT, Legal, Adult Education, Unemployment Insurance, Marketing and Communications, and Workforce Compliance and Policy. This workgroup will look at ways to enhance and improve agency wide access.

In early 2024, DWD issued Policy 2023-07: Language Accessibility and Language Access Plans (see https://www.in.gov/dwd/files/activepolicies/DWD_Policy_2023-07_Language_Accessibility_and_Language_Access_Plans.pdf), setting the foundation for an agency-level Language Access Plan that will provide guidance to each Program within DWD and any DWD sub-recipients (partners) to ensure compliance with all relevant federal requirements involving LEP applicants/recipients of Program information, benefits, and services. All programs and partners are required to ensure that LEP individuals have meaningful access to programs and activities within the WorkOne system and its partners.

For further details regarding LAS, including Babel notice information, please refer to the NDP referenced above.

IV. Coordination with State Plan Programs

Describe the methods used for joint planning and coordination among the core programs, and with the required one-stop partner programs and other programs and activities included in the Unified or Combined State Plan.

In reviewing and updating this Unified State Plan for the two-year modification cycle, DWD collaborated closely with Plan partners to revise and adjust the Plan where needed. Indiana is under a new administration with a new leadership structure through the Office of Commerce and has new agency-level leadership. Collectively, these factors influenced modifications to Indiana's goals and strategies for the upcoming two program years.

See below for a description of the coordination process in the initial development of the Plan, which was led by the former State Workforce Development Board (Governor's Workforce Cabinet or GWC).

Throughout the development of the Unified State Plan, the State has used a variety of methods to ensure coordination across agencies that administer programs and activities in our Unified Plan. State agencies, non-profit & private organization partners, and the general public have provided input throughout the Plan development process, all committed to a shared goal of creating a more integrated and effective workforce system that works for all Hoosiers. When first developing this Unified Plan in 2023-2024, the GWC led efforts on the plan. In the summer of 2023, GWC convened a steering committee with State agency partners to generate support for the development of the Plan and to chart a plan of action towards submission of the Plan in the Spring of 2024.

Engagement among core program partners and business partners was achieved through online surveys. The GWC developed surveys to better understand the strengths and challenges of the state's workforce development system. Surveys were distributed through the networks established by the local workforce development areas (LWDAs) and local workforce development board (LWDB) leaders were tasked with disseminating the surveys to their local core program partners and business partners. An additional request for input was made through the support of the Indiana Workforce Board Alliance (INWBA) to LWDB directors and members. Identified survey participants included required one-stop partner programs and other programs, such as not-for-profit organizations, LWDB members, adult education providers, community-based organizations, local & State government agencies, career & technical education, K-12 education, apprenticeship and work-based learning organizations & intermediaries, institutions of higher education, eligible training providers, healthcare and social services provider, labor organizations, chief elected officials, and corrections and rehabilitation providers.

V. Common Assurances (for all core programs)

	The Unified or Combined State Plan must include assurances that:	
1.	The State has established a policy identifying circumstances that may present a conflict of interest for a State Board or local board member, or the entity or class of officials that the member represents, and procedures to resolve such conflicts;	Yes
2.	The State has established a policy to provide to the public (including individuals with disabilities) access to meetings of State Boards and local boards, and information regarding activities of State Boards and local boards, such as data on board membership and minutes;	Yes
3.	The lead State agencies with optimal policy-making authority and responsibility for the administration of core programs reviewed and commented on the appropriate operational planning elements of the Unified or Combined State Plan, and approved the elements as serving the needs of the populations served by such programs;	Yes
4.	(a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined	Yes

	State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	
5.	The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes
6.	The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	Yes
7.	The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes

8.	The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;	Yes
9.	The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;	Yes
10.	The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);	Yes
11.	Service providers have a referral process in place for directing eligible populations to DVOP services, when appropriate.	Yes
12.	Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	Yes

VI. Program-Specific Requirements for Core Programs

The State must address all program specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

Adult, Dislocated Worker, and Youth Activities under Title I-B.

The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B-

A. General Requirements

1. ***Regions and Local Workforce Development Areas***

    A. Identify the regions and the local workforce development areas designated in the State.

Indiana's current workforce system operates in 12 geographically defined regions, with plans to realign regions consistent with Executive Order 25-45 (https://www.in.gov/gov/files/EO-25-45.pdf) during PY2026-2027. Implementation and transition will also involve designating new local workforce development area (LWDA) boundaries.

Indiana's current structure consists of twelve (12) regions and twelve (12) local workforce development areas (LWDAs), which are aligned in geographic composition, with "Region" and "LWDA" used interchangeably when referencing either.

Indiana's current LWDAs consist of the following counties:

- Region 1: Lake, Porter, LaPorte, Newton, Jasper, Pulaski, Starke

- Region 2: St. Joseph, Elkhart, Marshall, Kosciusko, Fulton

- Region 3: LaGrange, Steuben, DeKalb, Whitley, Allen, Wabash, Huntington, Wells, Adams, Grant

- Region 4: Benton, White, Cass, Miami, Carroll, Howard, Tippecanoe, Warren, Fountain, Montgomery, Clinton, Tipton

- Region 5/12: Marion, Boone, Hamilton, Madison, Hancock, Shelby, Johnson, Morgan, Hendricks

- Region 6: Jay, Blackford, Delaware, Randolph, Henry, Wayne, Rush, Fayette, Union

- Region 7: Vermillion, Parke, Putnam, Vigo, Clay, Sullivan

- Region 8: Brown, Monroe, Owen, Greene, Lawrence, Daviess, Martin, Orange

- Region 9: Bartholomew, Decatur, Franklin, Jackson, Jennings, Ripley, Dearborn, Jefferson, Switzerland, Ohio

- Region 10: Crawford, Washington, Scott, Clark, Floyd, Harrison

- Region 11: Knox, Gibson, Pike, Dubois, Posey, Vanderburgh, Warrick, Spencer, Perry

- Region 12: Marion

B. Describe the process and policy used for designating local areas, including procedures for determining whether the local area met the criteria for "performed successfully" and "sustained fiscal integrity" in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions.

Note: Indiana initiated the Region and Local Area Realignment Project in Fall 2025, releasing a data analysis white paper and a proposed regional map. Stakeholder engagement and public comment was held, including one-to-one consultations with DWD leadership and regional chief elected officials and local WDB chairs. This public comment process identified the need for additional data analysis to address feedback and explore alternative map options. This additional data analysis was completed in January 2026, resulting in a new recommended map for confirmation and adoption by Governor Braun and the Office of Commerce.

Indiana's local areas received initial designation approval from the Governor to maintain current local area designations during WIOA implementation in 2015 (WIOA Implementation Guidance WIOA T1-(107) P1) following written requests for designation pursuant to WIOA 106(b)(2) and TEGL 27-14.

In determining current local area (and regional) designations under WIOA, the State took part in a taskforce of the Indiana Career Council, which was focused on assessing system alignment. This taskforce thoroughly reviewed and discussed the workforce development board areas to determine if the 12 areas should be modified. After several meetings, which included input from local boards, the recommendation of the task force was to have the standing (WIA) local areas remain intact.

For initial designation, all 12 of the existing local areas met the criteria for performing successfully and maintaining fiscal integrity, as outlined in WIOA section 106(b)(2) and (3). Indiana verified, and continues to verify on an ongoing basis, these requirements through data reporting and monitoring efforts. Indiana has continued this structure through the State and local planning process, aligning its twelve local areas with its twelve WIOA regions. Indiana's policy and criteria for identifying regions and designating local areas is available at: https://www.in.gov/dwd/activepolicies.htm.

Currently, Regions 5 and 12 participate in joint planning, and Region 10 participates in bistate planning with Kentucky.

*Since initial designations were approved, there have been no requests to retract or change designation status, and thus, the local areas and CEOs are considered to have requested continued designation pursuant to 20 CFR 679.250(e).

Consistent with 20 CFR 679.230 - 290 and other federal guidance, Indiana's local area designation process is summarized below:

General procedural requirements for designation of local areas: The Governor will consult with the State Workforce Development Board (SWDB), the Indiana Department of Workforce Development (DWD), the Chief Elected Officials (CEOs) and affected local workforce development boards (LWDBs). The process will include a public comment period before approval of a local area designation.

New requests for designation: Designation or redesignation will take into consideration the extent to which the proposed area:

- is consistent with the labor market;

- is consistent with regional economic development within the State; and

- Has available Federal and non-Federal resources necessary to effectively administer activities and provisions required by WIOA, including whether the areas have the appropriate education and training providers, such as institutions of higher education and area career and technical education schools.

The Governor may approve a request at any time for designation as a workforce development area from any unit of general local government, including a combination of such units, if the SWDB determines that the area meets applicable designation requirements and recommends designation.

Regardless of whether a local area has been newly designated, or designated via initial or subsequent designation, the Governor may re-designate a local area if the re-designation has been requested by a local area and the Governor approves the request.

Subsequent designations: The Governor may review a designated local area at any time to evaluate whether the area continues to meet the requirements for subsequent designation under that paragraph. After initial designations, if the chief elected official and LWDB in local area submits a request for subsequent designation, the Governor must approve the request if the following criteria are met for the two most recent program years of initial designation:

- The local area performed successfully;

- The local area sustained fiscal integrity; and

- In the case of a local area in a planning region, the local area met the regional planning requirements described in WIOA 106(c)(1)

Regarding subsequent designation, as part of the bi-annual local board certification process, DWD Policy 2019-02, Change 4, requires local areas to assure that they have performed successfully and have sustained fiscal integrity for the preceding two program years. These assurances are also reviewed as part of the State and Local Planning processes. *For purposes of subsequent designation, the local area and chief elected official must be considered to have requested continued designation unless the local area and chief elected official notify the Governor that they no longer seek designation. The following definitions apply to "performed successfully" and "sustained fiscal integrity":

- *Performed successfully* – means the local area met or exceeded all levels of performance and the local area has not failed any individual measure for the last two (2) consecutive program years

- *Sustained fiscal integrity* - as defined in WIOA sec. 106(e)(2), means that the Secretary has not made a formal determination, during either of the last 2 consecutive years preceding the determination regarding such integrity, that either the grant recipient or the administrative entity of the area mis-expended funds provided under subtitle B due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration.

Any units of general local government or grant recipients that request but are not granted initial or subsequent designation as a local area will have the opportunity to submit an appeal to the SWDB in alignment with WIOA 106(b)(5), 20 CFR 683.630-640, and the Appeals process outlined in VI.a.1.C.

C. Provide the appeals process and policy referred to in section 106(b)(5) of WIOA relating to designation of local areas.

Appeals Process. In alignment with WIOA 106(b)(5), a denied request for local area designation by the State Workforce Development Board (SWDB) may be appealed (see DWD Policy 2023-14 re: Identification of Regions and Designation of Local Areas at https://www.in.gov/dwd/compliance-policy/policy/active/). An appeal must be submitted in writing (within 30 days of the denial) and must include the reason for appeal, all material originally submitted for consideration, and any additional relevant material responding to the denial from the SWDB. An opportunity for a hearing must be provided.

In the event of a hearing, it will be scheduled within 60 days of receipt of the appeal. If a decision on the appeal for designation has not been rendered in 90 days (from receipt of appeal) or if designation is denied, the requesting entity may request review by the Secretary of Labor. The Secretary may require that the area be designated as a workforce development area if the Secretary

determines that the entity was not accorded procedural rights under the State appeals process, or if the area meets the designation requirements.

> *D. Provide the appeals process and policy referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding.*

The appeals process relating to determinations for infrastructure funding is outlined within the MOU/IFA and State Funding Mechanism Policies, which can be accessed at: https://www.in.gov/dwd/compliance-policy/policy/active/. If the LWDB is unable to reach an agreement on the funding of infrastructure costs with all partners on or before July 1st of each year (or after the applicable extension of time deadline, if granted), the LWDB or affected partner must notify DWD that an agreement cannot be reached. Once notified, the Governor must administer the State funding formula to determine the appropriate share of infrastructure contributions for all partners for the program year impacted. A required partner may appeal the Governor's determination on the basis of a claim that:

- The Governor's determination is inconsistent with the proportionate share.

- The Governor's determination is inconsistent with the cost contribution caps.

2. *Statewide Activities*

> *A. Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities.*

The SWDB, in consultation with the DWD, develops policy and guidance for the statewide workforce development system. Policies for Title I, Title II, and Unemployment Insurance can be found at https://www.in.gov/dwd/activepolicies.htm. This guidance covers, but is not limited to, participant eligibility, priority of service; program standards; performance measures; staff qualifications, roles, and responsibilities; data collection, reporting, and validation; confidential and privileged information; monitoring; property/asset management; funding, allocation, and MOUs; State and local board governance; veterans' services; equal opportunity and nondiscrimination; etc. Specific program guidance can be found at the link provided above.

B. Describe how the State intends to use Governor's set aside funding for mandatory and discretionary activities, including how the State will conduct evaluations of Title I Adult, Dislocated Worker, and Youth activities.

DWD will collaborate, as applicable, with the SWDB for use of the Governor's set aside funding during the four-year plan cycle. Indiana has previously utilized set aside funding for innovative projects supporting statewide activities in alignment with 20 CFR 682.210. In past program years, for example, DWD issued Performance Support Grants to local areas seeking to conduct allowable activities supporting the State's focus on areas such as: employer needs, strategies for serving individuals with barriers, increasing number of participants in training, etc.

DWD may also utilize set aside funding to support work in systems, systems alignment, performance improvement strategies across WIOA titles. In addition to these priorities, DWD will utilize set aside funds to conduct Title I evaluation projects in alignment with 20 CFR 682.200(d) and 682.220. Indiana is a recent participant in the EvalPLC peer learning cohort with fellow states and DOL. The team's focus during the cohort project was to foundation-set and build a framework for future evaluation work, particularly for Title I. Indiana's EvalPLC team was led by DWD's WIOA Title I Strategy staff, with cross-divisional and cross-organizational members with specific Title I expertise. Indiana will continue to identify WIOA Title I evaluations that are focused on evaluating various program strategies. This work will aim to promote continuous improvement, research and test innovative services and strategies, and achieve high levels of performance and outcomes which strategically align with the WIOA State Plan.

C. Describe how the State will Utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers.

Indiana uses Rapid Response funding to market and host Rapid Response Orientations focused on upskilling, Job Fairs and Workshops in response to a Worker Adjustment Retaining Notification (WARN) being submitted, as well as in lieu of a WARN being submitted to reach dislocated workers not affected by a company required to submit a WARN for layoff, closure, or reduction in hours. Local workforce development boards are encouraged to apply for a Rapid Response Grant from the Indiana Department of Workforce Development (DWD) to assist with Rapid Response activities. The Scope of Work outlines requirements for a Rapid Response Grant that supports efforts to minimize the economic impact of workforce disruptions through both reactive Rapid Response services and proactive layoff aversion strategies. If Indiana has exhausted all WIOA funding allocated for Rapid Response, Indiana may pull from the Governor's set-aside fund for Dislocated Workers. Our goal is to use Rapid Response funding to reach any dislocated workers that may be affected by a WARN or Non-WARN, and to upskill as necessary to ensure an individual's swift return to employment. To further support our efforts in connecting with businesses that may be

looking at imminent layoff, DWD utilizes Dun & Bradstreet's "Market Insight" desktop data in evaluating and ranking Hoosier businesses based on financial risk. This critical insight allows DWD to use intelligence from companies in a proactive manner by providing a solutions-based approach to manage economic transitions. This program applies a blend of real time financial fitness and material change data analytics, for our ongoing evaluation. With this analysis, DWD supplies leads to local areas for consultation before a business catastrophe occurs and before a business and its workers become at risk. This software is in partnership with the Indiana Economic Development Corporation (IEDC) and is used to:

- Consistently analyze labor market data to drive proactive local engagement,

- Approach education and career upskilling in talent fluidly,

- Tap innovative funding sources, and

- Embrace ongoing talent evaluation.

Indiana DWD partners with local areas to build and implement Layoff Aversion strategies using the Dun and Bradstreet tool, and we are exploring another tech innovation to reach impacted Hoosiers, so they match job openings much more quickly and easily. These proactive strategies leverage Rapid Response funding in support of upskilling workers with their current employer, as well as upskilling dislocated workers in need of upskilling to match current labor market demand. Indiana is expanding on this work over the next four years to implement practices that provide early intervention to support businesses and their employees before dislocations occur. DWD team align with local areas to review and determine prospects for layoff aversion by analyzing the current level of engagement in the Client Relationship Manager (CRM) system and confirming the outreach strategy based on the plan within the local area. Discussions and strategies include addressing:

- The proposed layoff schedule and the employer's plans to assist the dislocated workers, including the status of any collective bargaining negotiations affecting layoff benefits,

- If there is a need for a voluntary labor management committee or workforce transition committee comprised of representatives of the employer, affected workers, their representatives, and/or other community entities as necessary to assist in planning and overseeing event-specific strategy that supports the reemployment of affected workers (this work typically starts at the State-level but will involve close coordination with the local region. Whether the region steps in to lead or is more of a collaborator with the State depends on regional capacity, skill, and confidence level to manage),

- Appropriate labor representatives to consult and coordinate with when planning Rapid Response activities for impacted workers covered by a collective bargaining agreement,

- The need for peer-to-peer worker outreach to connect dislocated workers with services in conjunction with the labor management committee or its equivalent, and

- Those procedures are in place for the timely access and referral to WorkOne programs, services, and information offered by the WIOA (including Wagner-Peyser), UI, and other workforce development programs.

Our Market Insight data analytics are applied directly to Rapid Response orientations by conducting radius searches of growing businesses in matching occupations. These leads then serve DWD and local areas as immediate connection points to reduce local dislocated impact. These connections could be in service of direct reemployment or alignment to upskilling affected talent in accessing quality jobs. These crucial connections serve our mission of coaching Hoosier businesses to produce their talent, rather than simply consume it. With an unemployment rate that many consider "full employment" we must look beyond churning immediate jobs, and drive communities into long term talent growth strategies. This approach supports Indiana's shift in moving our economic development focus toward talent capacity.

> *D. Describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.*

In the case of a natural disaster, the Employer Engagement team will work closely with FEMA, the American Red Cross, the local workforce development board, Local Rapid Response Coordinator, and Economic Development partners to provide services, recovery, and temporary relief by creating jobs through cleanup and restoration efforts. The Employer Engagement team will assist in identifying businesses adversely affected and workers who lost their jobs as a result of the disaster. The Employer Engagement team will work with the local workforce development boards to access existing funding at the State and regional level, as well as determine the need for additional funding through a Disaster National Emergency Grant. Any applicable grant will be used to provide additional funding for cleanup and/or humanitarian efforts. DWD will provide technical assistance to the regions as needed and will assist in the efforts to provide the following information and services to the victims of the disaster: Disaster Unemployment Assistance UI claims filing, referrals to FEMA to file claims, and job matching and referrals to partner agencies.

> *E. Describe how the State provides early intervention (e.g., Rapid Response) and ensures the provision of appropriate career services to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A) and TAA Section 221(a)(2)(A) .) This description must include how the State disseminates benefit information to provide workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the dislocated worker applying for them (Trade Act Sec.*

221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition and how the state will ensure the provision of appropriate career service to workers in the groups identified in the petition (TAA Sec. 221(a)(2)(A)).

As of June 30, 2022, the TAA program entered into Sunset termination provision (TEGL 14-22). Under the phased termination of the TAA program, the State is only able to serve and conduct outreach to individuals who had a TAA certification occurring prior to the termination of the program. Under current operations, states have been advised to suspend proactive outreach activities. As a result, the TAA Program Administration team's focus is on identifying previously certified TAA-eligible individuals who engage with One-Stop centers statewide, including those participating in Re-Employment Services and Eligibility Assessment (RESEA) activities.

If the TAA program is reauthorized by Congress, the State will resume normal operations.

B. Adult and Dislocated Worker Program Requirements

*1. **Work-Based Training Modules**: If the State is utilizing work-based training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.*

Indiana Department of Workforce Development (DWD) will continue to work with key partners to develop and implement strategies, frameworks, and models that expand work-based learning opportunities across the state. By collaborating with workforce and industry experts to address challenges and identify best practices, the State strengthens employer engagement and supports broader participation.

Indiana's workforce regions have used work-based learning models for many years. On-the-job training, incumbent worker training, and customized training have been effective tools for upskilling and reskilling participants to meet employer and industry needs. State policies require providers to regularly evaluate and improve these strategies. As work-based learning expands, local workforce development boards are encouraged to monitor programs in partnership with training providers, employers, and other stakeholders to ensure they continue to meet local workforce needs.

Indiana is also working to expand and strengthen Registered Apprenticeship (RAP) and Certified Pre-Apprenticeship (PRAP) programs. The State already has a strong base of U.S. Department of Labor Registered Apprenticeships, number 1 per capita in RAPs and 4 overall nationally, and will

continue increasing opportunities for employers to develop and implement these programs for both new and existing workers.

DWD's Work-Based Learning and Apprenticeship Program is implementing scalable models across the state through coordinated efforts with local workforce development boards, community organizations, and institutions of higher education. These efforts are designed to expand outreach, increase participation, and leverage multiple funding sources to support high-quality work-based learning opportunities.

> *2. Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., outreach to sponsors and prospective sponsors, identifying potential participants and connecting them to apprenticeship opportunities).*

Indiana will continue to expand Registered Apprenticeship as a core workforce strategy serving employers across all industry sectors. The State's approach focuses on coordinated service delivery, local engagement, and targeted technical assistance.

First, the Department of Workforce Development has aligned employer-facing services within a single Business and Community Engagement structure. This alignment brings together Employer Engagement, DWD's Work-Based Learning and Apprenticeship Program, and Serve Indiana to improve coordination, streamline service delivery, and provide more effective solutions for employers and jobseekers.

Second, all current twelve local workforce development boards serve as intermediaries to provide services at the community level. These boards work directly with employers, training providers, and jobseekers to identify apprenticeship opportunities, recruit participants, and support program implementation.

Third, DWD's Work-Based Learning and Apprenticeship Program has developed a set of technical assistance resources to support sponsors and prospective sponsors. These include mentoring guides, registered apprenticeship development tools, and pre-apprenticeship resources designed for adult education providers, employers, high schools, and higher education institutions. These tools help partners design, launch, and sustain high-quality apprenticeship programs while connecting participants to career opportunities.

Business and Community Engagement

The Business and Community Engagement division has played multiple roles within the State Plan over the years. Historically, these functions were carried out by separate offices, including Employer Engagement and DWD's Work-Based Learning and Apprenticeship Program, which was established in 2018 to expand work-based learning across Indiana. Since the first quarter of 2022, these offices, along with Serve Indiana, have operated as a single division focused on both talent

attraction and talent retention. The division works closely with local workforce development boards and employers to identify workforce needs and provide coordinated strategies that address immediate hiring demands, long-term growth, and employee satisfaction. This structure allows staff to collaborate across functions and align multiple funding streams to support employers and jobseekers.

The division includes subject matter experts with backgrounds in secondary and postsecondary education, workforce training, data analytics, business development, career coaching, and human capital management. Operating as a single office allows the team to respond more efficiently to employer needs while using this combined expertise to design effective workforce solutions. Work-based learning programs are central to this approach, supporting both talent attraction and incumbent worker retention, with a focus on middle- and high-skill occupations. Program quality is maintained through a joint staff of industry and education professionals and a structured certification and approval process. These programs are not intended to replace traditional four-year degrees. Instead, they provide flexible pathways that may include industry credentials, college credit, certificates, and degree attainment while participants are employed.

Indiana has made significant progress in expanding apprenticeships over the past several years. The State operates two comprehensive work-based learning models: Registered Apprenticeship and Certified Pre-Apprenticeship. Each program is effective on its own, and they are especially impactful when connected through formal articulation agreements. Since DWD's Work-Based Learning and Apprenticeship Program was established in 2018, Indiana has experienced steady growth in both programs and participant counts. The State consistently ranks among the top five in the nation for total registered apprenticeship participants and expects continued expansion, particularly in pre-apprenticeship, as adult education providers and high schools increase partnerships with registered apprenticeship sponsors.

Local Workforce Development Boards (LWDBs) as Registered Intermediaries / Sponsors

Local Workforce Development Boards serve as registered apprenticeship intermediaries and, in some cases, program sponsors. As of January 2020, all twelve local workforce development boards entered into subgrant agreements with the Indiana Department of Workforce Development to develop and scale registered apprenticeship programs across their regions.

As intermediaries, local workforce development boards lead employer outreach and collaboration, support program expansion, and assist with the development of registered apprenticeships, state earn-and-learn programs, and pre-apprenticeship pathways. In some regions, boards also serve as registered apprenticeship sponsors and are responsible for program registration and required reporting to the U.S. Department of Labor.

Program and participant data are reported at the state level through Indiana Career Connect and INTERs, the State's education management systems. This structure supports the State Plan by allowing local areas to lead efforts to attract and retain apprentices in high-wage, high-demand occupations that align with regional economic needs.

Technical Assistance Tools and Program Alignment

The Indiana Department of Workforce Development provides a set of practical toolkits on its resources webpage to support the design, implementation, and expansion of high-quality work-based learning programs. These toolkits are intended for employers, workforce partners, adult education providers, secondary schools, and postsecondary institutions. Each resource offers step-by-step guidance, templates, and best practices that align with state and federal apprenticeship standards. Together, these materials create a consistent framework that helps partners develop programs that meet employer needs while providing participants with clear pathways to employment and advancement.

The Mentoring Toolkit focuses on building effective workplace mentoring structures that support apprentice success. It outlines the roles and responsibilities of mentors, provides guidance on mentor selection and training, and includes tools for tracking progress and providing feedback. By strengthening the mentor-apprentice relationship, the toolkit helps employers improve retention, skill development, and overall program quality.

The Registered Apprenticeship and Adult Education Pre-Apprenticeship toolkits are designed to help organizations create programs that align with industry standards and connect participants to employment. The Registered Apprenticeship Toolkit provides guidance on program design, work process schedules, related training requirements, and registration procedures. The Adult Education Pre-Apprenticeship Toolkit helps adult education providers integrate occupational training, employability skills, and supportive services into structured pathways that prepare participants for entry into registered apprenticeship or employment.

The Secondary Pre-Apprenticeship Toolkit is tailored for high schools and career and technical education programs. It provides guidance on aligning coursework with industry needs, integrating work-based learning experiences, and establishing articulation agreements with registered apprenticeship sponsors.

In addition to these resources, the Apprenticeship Indiana Institute offers structured training and professional development for employers, educators, and workforce professionals. The Institute provides courses, technical assistance, and communities of practice that build local capacity to design, implement, and sustain high-quality apprenticeship and pre-apprenticeship programs across the state.

3. **<u>Training Provider Eligibility Procedure</u>**: *Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).*

Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

An Eligible Training Provider is an entity that provides a program of training services and has been determined to be eligible to receive Workforce Innovation and Opportunity Act (WIOA) Title I-B funding for training services through an Individual Training Account. These providers and programs will be included on Indiana's Eligible Training Provider List (ETPL). The provider must be open to the public and one of the following types of entities:

1. Institution of higher education that provides a program leading to a recognized postsecondary credential; or

2. Registered Apprenticeship Programs (RAPs); or

3. Other public or private providers of training services, which may include:

   a. Community-based organizations;

   b. Joint labor-management organizations; and

   c. Eligible providers of adult education and literacy activities under Title II of WIOA if such activities are provided in combination with training services described at §680.350 of the WIOA regulations.

Indiana's ETPL is administered through the INTraining website. It is important to note the distinction between the INTraining website and the ETPL. The INTraining website is the means by which training providers submit applications to have their programs listed for Hoosiers to view and access. Once the providers submit the required program information to be determined eligible to be placed on the INTraining website, a more thorough review will be completed by DWD staff to determine whether the program is also eligible to receive WIOA funding, and, therefore, be placed on the ETPL. The ETPL is a subset of INTraining and includes the selected INTraining providers and programs which have been determined eligible to receive WIOA funding.

The INTraining dashboard is viewable by the public and maintains multiple features which assist clients in finding the training program most suited to their needs. Jobseekers can refine their search by utilizing a number of filters, including the ability to sort by programs funded "in certain areas" or "statewide." They may view all training programs in a particular region or sort by county. They may view only training programs that are offered 'on- line' or sort by 'off-line' (in person). If a jobseeker is in pursuit of a particular type of credential, he or she may seek and sort the training options that specifically lead to an industry recognized certification, licensure, a certified pre-apprenticeship certification a registered apprenticeship certification, or an accredited post-secondary credential.

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The procedures, eligibility criteria, and information requirements for determining training provider initial and continued eligibility are outlined in DWD Policy 2020-16, Change 3 and its companion guidance, DWD Technical Assistance 2020-17, Change 3 (the policy's TA guide), both of which can be found at: https://www.in.gov/dwd/compliance-policy/policy/active/. DWD's policy was released in July of 2025. The companion TA guide serves as official State level guidance provided to complement DWD Policy 2020-16, Change 3, to provide robust procedural and process direction for training providers. aligning with DOL-ETA recommendations that include additional clarification on a provider's initial and ongoing eligibility requirements, explication on the unique approval process for Registered Apprenticeship Programs (RAPs) as WIOA Title I Eligible Training Providers (ETP), and to provide specific reasons for which DWD may terminate a training provider, provider location, or programs.

Below are key points from the policy and its companion TA guide:

Initial Application: The INTraining initial application process consists of two application types: Provider Location and Program.

Step One: Provider Location Application

Training providers must complete and submit a provider location application through the INTraining portal. A separate provider location application is required for each training location the entity wishes to seek approval.

The provider location application requires information about the provider and training location. Required information will include, but is not limited to:

1. Address for training location

2. Contact information for training location

3. Provider type

4. Accreditations and licenses, if applicable

Provider locations will be subject to clearance checks, which must be passed to receive approval. Pass/fail determination will be at the discretion of DWD. Clearance checks may include, but are not limited to:

1. Indiana Department of Revenue

2. Indiana Secretary of State

3. DWD Unemployment Insurance Tax

4. Office of the Indiana Attorney General

F. Any relevant accrediting bodies, which may include, but are not limited to:

1. Indiana Department of Health

2. Indiana State Board of Nursing

3. Office for Career and Technical Schools

4. Board for Proprietary Education

5. Indiana Professional Licensing Agency

Step Two: Program Application

Once the provider location application has been approved, the training provider must complete a program application for each training program it seeks to have included on the INTraining list[1]. Programs must be offered to the general public to be eligible for consideration. Required information will include, but is not limited to:

1. Description of the program of training services

2. Information concerning whether the training provider is in a partnership with a business for the program of training services

3. Program related costs

4. Information addressing the alignment of training with in-demand industry sectors and occupations

5. Confirmation of compliance with 29 CFR Part 38, "Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act" Final Rule (January 3, 2017)[2].

If the training provider fails to complete either the provider location or program application or fails to provide any information being requested by DWD within sixty (60) days of submitting the application or of being notified of the omitted information, the provider location and/or program applications will be denied.[3]

Upon satisfactory submission and approval of a provider and program application, the program will appear on the INTraining website. At this time, the system will automatically review the program specifics to determine whether the program is eligible to receive WIOA Title I funding and therefore be included on the ETPL.

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[1] A single program application may be associated with several provider (or training) locations. A new program application is needed for different program types or when commensurate programs have different details (i.e., course length, tuition, work experiences, etc.).
[2] 29 CFR 38.
[3] For more information on denials, see Conditions of Denial in DWD Technical Assistance 2020-17, Change 3. Initial ETPL Eligibility Under WIOA, DWD has set specific requirements a program must meet to be eligible to receive WIOA funding and be listed as an ETP. Initial eligibility consists of meeting two requirements: in-demand metrics and performance metrics.

The State Workforce Development Board (SWDB), in consultation with DWD, reserves the right to review and reestablish the initial and continued eligibility requirements on an annual basis. Initial and continued eligibility requirements can be found in DWD Policy 2020-16, Change 3. See https://www.in.gov/dwd/files/activepolicies/2020-16-PC1_INTraining_ETPL.pdf.

In-Demand Metrics

When determining a program's eligibility to receive WIOA funding, DWD will consider the demand of the occupations the program trains towards. Indiana uses a scoring formula to rate occupations for both short-term and long-term outlooks to determine if the occupation is an in- demand occupation in a particular region. The formula considers the following characteristics: job demand, retention, growth, and wages. The final score results in a rating of one (1) through five (5) for each occupation, with five representing the state's priority occupations. The Indiana Top Jobs website can be found at https://topjobs.dwd.in.gov/.

Programs can qualify to be funded regionally or statewide.

1. Lead to an in-demand occupation in the region and[4]

    a. Occupations are based upon the Classification of Instructional Programs (CIP) code to Standard Occupational Classification (SOC) crosswalk listed on the program application[5]

    b. Identified occupations must meet the Top Jobs threshold—a 3 (or higher) flame ranking

    c. Top Jobs data is updated annually on INTraining at the beginning of every program year (July 1st)[6]

2. Lead to a post-secondary credential

    a. Industry Recognized Certification

    b. Licensure

    c. Apprenticeship

    d. Accredited Post-Secondary Program of Study

        i. Accredited short-term certificate (< Associate degree)

        ii. Associate degree

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[4] For information on an in-demand determination review request, see the Review of Regional Demand or Industry Recognized Certification section of DWD Technical Assistance 2020-17, Change 3.
[5] The CIP or SOC codes may be updated throughout the year as new codes are released by the National Center for Education Statistics (NCES) and the Bureau of Labor Statistics (BLS).
[6] Data will be updated each July utilizing April's bi-annual (every 2 years) report.

iii. Bachelor's degree

iv. Master's degree

v. Doctoral degree

In 2023, INTraining has included a fifth credential type, Pre-Apprenticeships, which are reviewed and certified by the DWD's Work-based Learning and Apprenticeship. These credentials include industry-recognized certification training as well as allowing participants through a MOU with the employer to transition to a registered apprenticeship program upon completion.

The other requirement for initial and continued eligibility is **Performance Metrics**:

Performance Metrics

When determining a program's eligibility to receive WIOA funding, the State will consider the performance outcomes of the program. If a program does not have available data at the time of initial application, the program will receive a one-year data waiver. Programs can qualify to be regionally or statewide funded. Programs must meet the following minimum performance criteria:

1. Best of 2nd or 4th Quarter Completers Employment Rate greater than 30%; or

2. 50% or greater Credential Rate of all students served; or

3. Annual Total Completer's Median Earnings equal to or above $10/hour.

If a program has been denied inclusion on the ETPL for failure to meet the required in-demand and/or performance criteria, the provider and program will remain on the INTraining list but will be removed from the ETPL. This renders them ineligible to receive WIOA funding and prompts the removal of the funding icon until both in-demand and performance criteria have been met.

Indiana has set performance criteria to denote those programs that meet exceptional performance metrics. Programs must meet the following criteria to receive this designation:

1. Best of 2nd or 4th quarter completers employment rate greater than 60%; and

2. Credential rate of all students served greater than 80%; and

3. Annual total completer's median earnings equal to or above $15/hour.

As DWD's Education and Training department monitors the continued eligibility of ETPL programs of study based on current performance criteria, DWD will be recommending elevating minimum program performance benchmarks to remain listed as an eligible training provider.

Continued Eligibility Requirements for INTraining and the ETPL

In accordance with WIOA, DWD has set specific requirements a training provider must meet or complete to maintain their eligibility on either list. Continued eligibility consists of meeting and completing four requirements: in-demand metrics, performance metrics, annual review, and federal performance reporting.

To maintain ETPL eligibility, in-demand metrics, and performance metrics, as listed in the Initial Eligibility for the ETPL section, must continue to be met.

In July 2025, DWD updated ETPL Policy-16, Change 3 to include language that addresses access to training throughout the State which is physically and programmatically accessible for individuals who are employed or those with barriers to employment; reporting and accuracy of information on federal and State training programs, including performance and cost reports; and ensuring training program quality by requiring that programs lead to a recognized postsecondary credential. See https://www.in.gov/dwd/files/activepolicies/2020-16-PC1_INTraining_ETPL.pdf. DWD Policy 2020-16, Change 3: INTraining and Eligible Training Provider List (ETPL) Eligibility and Establishment Under the Workforce Innovation and Opportunity Act (WIOA) Title I

Annual Review

To maintain INTraining or ETPL inclusion, all training providers must complete an annual review of each provider location and program to ensure that the WIOA Title I-financially assisted program is conducted in a nondiscriminatory way according to WIOA Section 188 and 29 CFR Part 38. The annual review due date is based upon the provider location or program application's initial approval date; therefore, training providers may have to complete an annual review multiple times if they have separate locations and/or programs that were approved at different times throughout the year.

An annual review includes the training provider reviewing and making any necessary updates on the provider location or program application. The training provider will receive a sixty (60) day notification prior to the annual review due date informing them of the deadline for submission of the review and any updates. Upon submission, the updated program information will be reviewed by DWD staff. If the training provider does not complete the annual review by its due date, the application will be placed into an "Information Requested" status. If the training provider fails to complete the annual review within sixty (60) days of the program being placed into "Information Requested" status, the program application will be denied. The training provider may immediately re-apply.[7]

Performance Reporting (federal reporting)

To maintain INTraining or ETPL inclusion, all training providers must complete the annual federal performance reporting. Under WIOA, each State is required to submit student-level data for all training programs to U.S. Department of Labor on an annual basis. Student-level data should be reported at the beginning and end of each cohort and must be reported by the July 31st deadline for that reporting period. The following requirements apply to federal performance reporting:

1. Student-level data **must** be reported before or during the open federal performance reporting time period of **July 1st through July 31st**.

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[7] For more information on denials, see the Conditions of Denial section of DWD Technical Assistance 2020-17, Change 3.

2. Training providers are required to submit student-level data to DWD via the INTraining portal annually.

3. Student-level data must be reported under the program location in which the student was enrolled.

4. Training providers must report student-level data for every program location that was in "Staff Approved" status at any time during the reporting program year.

   a. **If the program did not serve any students, the training provider is still required to complete federal performance reporting**. The training provider will be able to indicate 'no students were served' during the reporting program year.

5. Student-level data must be submitted for all students, regardless of funding sources.

   a. First name

   b. Last name

   c. Full social security number (or last four digits of the SSN)

   d. Address (only if full SSN is not available)

   e. Date of Birth

   f. Gender

   g. Race

   h. Course Start Date

   i. Course End Date

   j. Enrollment Status

   k. Name of Assessment(s) (if applicable)

   l. Assessment(s) Pass/Fail (if applicable)

   m. Deceased

   n. Incarcerated

Any program that does not successfully complete their reporting of appropriate program year student-level data by the July 31st deadline, will be placed into a "**Pending Data**" status and will **not** be fundable for a **minimum of six (6) months**. The training provider will still be obligated to submit student-level data during the six (6) month unfunded time frame. During and following the "Pending Data" status, the following rules apply:

1. **Training provider completes student-level data reporting during the pending data timeframe**—the program will move to "Suspended" status for the remainder of the six (6)

month time period and will remain unfunded. At the end of the suspension, a funding determination will be made.[8]

2. **Training provider <u>does not complete</u> student-level data reporting during the pending data time frame**—the program will be terminated for two (2) years. Please note: A new duplicate program application will not be accepted during the termination period. If a duplicate program is submitted, the new program will be denied.[9]

The companion TA guide addresses the exception to eligibility requirements for Registered Apprenticeships:

Requirement and Eligibility Exceptions

Apprenticeships

U.S. Department of Labor Registered Apprenticeship Programs (RAPs) are automatically eligible to be included on the ETPL and are exempt from federal, State, and local ETP eligibility and federal performance reporting requirements. The RAP will automatically be included on the ETPL once the program sponsor opts in and has provided the following information to DWD:

1. Occupations included within the RAP

2. The name and address of the RAP sponsor

3. The name and address of the Related Technical Instruction (RTI) provider, and the location of instruction if different than the program sponsor's address

4. The method and length of instruction

5. The number of active apprentices

RAPs will remain on the ETPL until:

1. The RAP sponsor notifies DWD it no longer wants to be included on the list

2. The program becomes deregistered under the National Apprenticeship Act

3. The program is determined to have intentionally supplied inaccurate information

4. A determination is made that the RAP substantially violated any provision of Title I of WIOA or the WIOA regulations, including nondiscrimination and equal opportunity provisions of 29 CFR part 38

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[8] For more information, see Initial and Continued Eligibility Requirements section of DWD Technical Assistance 2020-17, Change 3.
[9] For denial terms, see Conditions for Denial section of DWD Technical Assistance 2020-17, Change 3.

The companion TA guide also addresses general responsibilities of the Training Providers and addresses new monitoring processes that have been put into place, both to support accuracy and maintain quality training programs:

Provider Responsibilities

In addition to meeting and maintaining eligibility requirements, training providers are obligated to adhere to the following responsibilities:

1. Ensure instructor credentials meet the minimum qualifications:

    a. Possess a two-year degree from an institution recognized by the United States Department of Education or national accrediting body in the major area they are assigned to teach; or

    b. Possess practical experience of not less than two years in the major area they are assigned to teach and professional licensure or industry-recognized certification in the field.

    c. All faculty applications to teach in the school must be accompanied by transcripts, letters, and documents supporting the application.

    d. These requirements do not supersede any requirements set by another oversight agency that may be more stringent than that of INTraining.

2. In addition, and separate to the INTraining portal record, training providers must maintain a paper or digital record of all eligible participants using the following guidelines:

    a. Must contain copies of any documentation that pertains to the participant's eligibility, including all attendance records and any earned credential documentation.

    b. Must be kept in a secured area with limited access, as these files contain Personally Identifiable Information (PII).

    c. Must be kept for a minimum of 3 years.

    d. For additional resources on ADA requirements, please refer to the following documents: ADA Compliance Standards, ADA checklists, WIOA Equal Opportunity Regulations, and WIOA Equal Opportunity Reference Guide.

3. Maintain at least one active email address that is regularly checked.

4. Respond within five business days to all communications from DWD including phone calls, emails, online surveys, or requests for other documentation to assist the Department with ongoing program quality assurance measures.

Monitoring

Monitoring activities will include application and portal review, site-visits, and review of student records. DWD reserves the right to visit any training provider at any time on-site and unscheduled or request provider kept participant records for the purpose of program monitoring. Monitoring activities may include, but are not limited to:

1. Site visits (scheduled or unscheduled)

2. Staff or student interviews (scheduled visits only)

3. Classroom observation

4. Review of full participant records

5. Review of resources, tools, and curriculum

6. Review of program cost[10]

7. Review of instructor credentials

8. Review of ADA compliance

9. Review of any requirements related to the INTraining and ETPL policy[11]

10. Financial records

11. Review of EO compliance

DWD reserves the right to place INTraining providers and/or ETPs or programs on an improvement plan or to remove such training providers or programs from INTraining or the ETPL. Reasons for placement on an improvement plan or removal from INTraining or the ETPL may include, but are not limited to:

1. Poor performance

2. Misuse of funding

3. Loss of ETPL fundable status

4. Falsification of documentation

5. Observations or findings from monitoring activities, etc.

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[10] DWD reserves the right to request an itemized list of program costs outside of what is requested on the application. If the training provider submits a program cost increase, the training provider may be required to submit a justification.
[11] INTraining and Eligible Training Provider List (ETPL) Eligibility and Establishment Under the Workforce Innovation and Opportunity Act (WIOA) Title I.

Indiana's ETPL policy addresses termination of training programs, and the Technical Assistance provides more details regarding DWD determinations of 'denied' and 'terminated':

DWD Determinations

Conditions for Denial

DWD reserves the right to deny a training provider, provider location, or program from INTraining or ETPL. Reasons may include, but are not limited to:

1. Failure to submit a completed application

2. Failure to submit requested information

3. Failure to complete annual review

4. Failure to meet in-demand metrics[12]

5. Failure to meet performance metrics

6. Failure to attain or retain required State licensure, certification, accreditation, or authorization to operate from the appropriate State oversight agency

If the training provider's location or program is denied and removed from the INTraining list for any of the above reasons, the training provider may re-apply once the issue has been resolved. If the training provider location is only denied from the ETPL for any of the above reasons, the provider or program application will automatically be re-evaluated as new information is received. A denial is not appealable.

If a training provider location or program is denied and removed from the ETPL while WIOA participants are enrolled and have already begun their training, the participants may complete the program unless the provider or program has lost State licensure, certification, accreditation, or authorization to operate from the appropriate State oversight agency. If the provider has lost its authority to operate, DWD will make every effort to find alternative, comparable training for the participant.

Conditions for Termination

DWD reserves the right to terminate a training provider, provider location, or program from INTraining or ETPL. Reasons may include, but are not limited to:

1. Failing to complete student-level data reporting requirements

2. Intentionally supplying inaccurate information

3. Misrepresenting costs or services

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[12] For information on a review request, see Review of Regional Demand or Industry Recognized Certification sections in DWD Technical Assistance 2020-17, Change 3.

4. Substantially violating WIOA statutes or regulations

5. Barred by the federal government from receiving federal funds

If the training provider location or program is terminated for any of these reasons, the provider must wait at least two (2) years before re-applying. The training provider is liable to repay all WIOA adult and dislocated worker training funds received during the period of non-compliance. A termination is appealable.[13]

The new policy and companion TA guide address a new and multi-tiered appeal process available to training providers who wish to challenge a termination:

Review of Termination

Training providers may request a review by DWD for any provider location or program that has been terminated. A training provider may request up to three reviews by DWD: administrative review, appeal of administrative decision, and objection to the Department Review Committee's decision.

Administrative Review

The request for an administrative review of termination from INTraining or the ETPL must be submitted electronically to INTraining@dwd.in.gov within ten business days of the date of notice of its termination. The request for review must include the following:

1. Name of training provider

2. Program location ID, if applicable

3. Justification for review

4. Any documentation to support the provider's justification

The DWD Associate Chief of Talent Development will select an Administrative Review Committee comprised of three DWD staff members who were not involved in the initial decision. This committee will conduct a review and send notice of its decision to the parties within thirty (30) business days of receiving the request for an administrative review.

Appeal of Administrative Review Decision

An appeal of the administrative review decision must be submitted electronically to INTraining@dwd.in.gov within fifteen business days of the date of the Notice of Administrative

Review decision. The request for an appeal of the administrative decision must include the following:

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[13] For more information on appeals, see section Review of Termination in DWD Technical Assistance 2020-17, Change 3.

1. Name of training provider

2. Program location ID, if applicable

3. Copy of Administrative Review Decision

4. Justification for appeal

5. Any documentation to support the appeal's justification

A Department Review Committee, designated by the DWD Commissioner, which has not been involved in the initial or the Administrative Review decision and is not Workforce Division team members, shall facilitate the appeal process. The Department Review Committee will schedule an administrative hearing not more than sixty business days after DWD receives the written request for appeal.[14] All appeal hearings will be held de novo, and the Talent Development Department will bear the burden of proof. Indiana Rules of Trial Procedure will govern the administrative proceedings. The Department Review Committee will issue a decision within ninety business days of the completion of the hearing.

Objection of the Department Review Committee's Decision

Not more than 15 days after the issuance of a written decision by the Department Review Committee, any party adversely affected by the order may file an objection to the decision in writing to the DWD Commissioner and request that the Commissioner review the decision. The party must identify the basis of the objection with reasonable particularity. No later than thirty after the objection is filed with the Commissioner, the Commissioner shall issue a final decision affirming, modifying, or dissolving the Department Review Committee's decision. The Commissioner may remand the matter, with or without instructions, to the Department Review Committee for further proceedings. The Commissioner is the ultimate authority (as defined by IC 4-21.5-1-15) for DWD.

A party may contest the decision of the ultimate authority by filing a petition for judicial review consistent with the requirements of I.C. 4-21.5- 5 et seq.

> *4. Describe how the State will implement and monitor for the Adult Priority of Service requirement in WIOA section 134 (c)(3)(E) that requires American Job Center staff, when using WIOA Adult program funds to provide individualized career services and training services, to give priority of service to recipients of public assistance, low-income individuals, and individuals who are basic skills deficient (including English language learners).*

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[14] Only appeal requests received by DWD within fifteen (15) business days of the date of notice of the Administrative Review Decision shall be scheduled for an administrative hearing. All other requests will be denied.

DWD collaborated with U.S. Department of Labor to revise and publish updated Adult Priority of Service guidance in 2023. (See Policy 2019-04, Change 3 at https://www.in.gov/dwd/compliance-policy/policy/active/). Additionally, local areas must have written policies that delineate how they will give priority of service and must adhere to these policies. DWD will review data and local policies to ensure priority is being carried out appropriately and will provide technical assistance as needed. DWD is continuing to evaluate local level benchmarks and will review data and local policies to ensure priority is being carried out appropriately. Technical assistance will be provided as needed.

5. Describe the State's criteria regarding local area transfer of funds between the adult and dislocated worker programs

The 2025 Formula Allocation Memo reaffirmed that local workforce development boards (LWDBs) may transfer up to 100% of the Adult and Dislocated Worker allocations, provided local entities seek approval as noted in current WIOA allocation memo available at https://www.in.gov/dwd/compliance-policy/policy/active/.

6. *Describe the State's policy on WIOA and TAA co-enrollment and whether and how often this policy is disseminated to the local workforce development boards and required one-stop partners. Trade Act Sec. 239(f), Sec. 235, 20 CFR 618.325, 20 CFR 618.824(a)(3)(i).*

The State issued DWD Policy 2020-06, Change 1 in March 2022 to emphasize the requirement of co-enrollment of TAA individuals into WIOA Dislocated Worker as mandated by the Trade Act sections above. The policy was distributed to local workforce development boards, posted on the DWD Policy website, and provided to the DWD Regional Support Managers for implementation by the local workforce development boards. Due to the significantly reduced volume of new TAA enrollments during the program sunset period, the TAA Unit no longer issues quarterly co-enrollment reports to each region. Instead, co-enrollment information is provided on an as-needed basis to support case management, monitoring activities, and regional requests. This approach ensures that local workforce development boards continue to receive the information necessary to coordinate WIOA Dislocated Worker and TAA services, while aligning reporting practices with current program activity levels.

7. *Describe the State's formal strategy to ensure that WIOA and TAA co-enrolled participants receive necessary funded benefits and services. Trade Act Sec. 239(f), Sec. 235, 20 CFR 618.816(c).*

Co-enrollment information is provided to local workforce development boards on an as-needed basis to support case management and ensure alignment with WIOA Dislocated Worker services. The TAA Program Administration team continues to schedule strategy meetings with any local area that is not meeting co-enrollment expectations or when co-enrollment gaps are identified through case reviews or regional requests. The TAA Program Administration team also provides co-enrollment statistics to the DWD Compliance team for incorporation into WIOA monitoring activities, ensuring ongoing oversight and coordination of funded benefits and services for co-enrolled participants.

8. *Describe the State's process for familiarizing one-stop staff with the TAA program. 20 CFR 618.804(j), 20 CFR 618.305.*

The TAA program is currently administered statewide by a dedicated TAA Program Administration team operating in a virtual service model, with in-person assistance available to local areas as needed. Because the program has been in expiration status since June 2022 and no new certifications have been issued, the State's focus is on identifying and serving previously certified TAA-eligible individuals.

One-Stop staff are familiarized with the TAA program through the general workforce onboarding training provided to new hires, which includes a high-level overview of TAA alongside other workforce programs. Refresher information or targeted guidance is available to regional staff upon request. Re-Employment Services and Employment Service Navigation staff are instructed to refer any potentially eligible TAA participants to the TAA Program Administration team to ensure appropriate follow-up and coordination of services.

C. Youth Program Requirements

With respect to youth workforce investment activities authorized in section 129 of WIOA, States should describe their strategies that will support the implementation of youth activities under WIOA. State's must-

> *1. Identify the State-developed criteria to be used by local boards in awarding grants or contracts for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA.[15] Further, include a description of how the State assists local areas in determining whether to contract for services or to provide some or all of the program elements directly.*

The Indiana Department of Workforce Development (DWD) and local workforce development boards (LWDBs) recognize and adhere to 20 CFR § 681.400 to allow grant recipients/fiscal agents the option to directly provide some, or all, of the required youth workforce investment activities. When not directly providing services, the LWDB will award grants or contracts on a competitive basis to providers of youth workforce activities, while taking into consideration the ability of providers to meet performance accountability measures based on the primary indicators of performance for the WIOA Youth program, as described in the WIOA Section 116(b)(2)(A)(ii). The LWDB must also conduct oversight with respect to such providers.

The State-developed criteria for local boards to consider when procuring youth providers are the following:

- Ability to deliver services to the targeted population in accordance with locally established guidelines;

- Experience in working with youth in similar programs and activities;

- Past and current collaboration with other service providers;

- Past performance record, including both programmatic and fiscal integrity;

- Understanding of and commitment to meeting goals and objectives; and

- Demonstration of understanding of and commitment to continuous improvement methods.

As local boards make decisions about youth provider procurement and to award contracts and grants to providers, they must also:

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[15] Sec. 102(b)(2)(D)(i)(V)

- Identify youth service providers based on criteria established in the State Plan;

- Take into consideration the ability of the provider to meet performance accountability measures;

- Award such grants or contracts on a competitive basis and in accordance with the Procurement Stands found at Uniform Guidance at 2 CFR parts 200 and 2900; and

- If the service provider (entity) selected fulfills another role in the local area, the LWDB must comply with applicable conflict of interest, separation of duties, and firewalls requirements in relation to WIOA's single entity/multiple role parameters.

LWDBs must identify eligible providers of youth workforce investment activities in the local workforce development area by awarding grants or contracts on a competitive basis, based on the recommendation of the youth standing committee, if the local board chooses to establish a standing youth committee under 20 CFR Section 681.100; if no such youth committee exists, the LWDB then must assign a committee that function. Where the LWDB elects to award contracts but determines, there is an insufficient number of eligible providers of youth workforce investment activities in the local area, (such as a rural area), the LWDB may award grants or contracts on a sole source basis. The LWDB committee must take into consideration the ability of providers to meet performance accountability measures based on the primary indicators of performance for the WIOA Youth program.

Procurement of youth service providers must be in accordance with the Uniform Guidance at 2 CFR Parts 200 and 2900, in addition to applicable State and local procurement laws. Grantees and sub grantees must establish, maintain, and follow written procurement standards and procedures that are in compliance with all applicable federal, State, and local laws and regulations.

Currently, local areas are able to set their own parameters for procurement of youth services, thus not all areas describe or request specific performance plans related to primary performance indicators in their Request for Proposal. However, some local areas list metrics of success to ensure providers meet or exceed goals, including pay for performance goals. Awards are then made to organizations possessing the demonstrated ability to perform.

- As determined by U.S. Department of Labor and DWD, performance goals include:

  o Placement in employment, education, or training;

  o Employment, education, or training retention;

  o Median earnings;

  o Credential rate;

  o Attainment of degree or certificate; or

  o Measurable skills gains

- o Valid satisfactory record of past performance in delivering the proposed or similar services, including demonstrated quality of services and successful outcome rates from past programs (including non-WIA/WIOA programming)

- o Ability to provide services that can lead to the achievement of competency standards for customers with identified barriers or deficiencies.

For youth service provision, performance analysis will continue to focus on performance of required WIOA youth service performance.

Youth service provision procurement will adhere to 20 CFR 681.400.

2. Explain how the State assists local workforce boards in achieving equitable results for out-of-school and in-school youth. Describe promising practices or partnership models that local areas are implementing and the state's role in supporting and scaling those models within the state for both in-school and out-of-school youth.

The purpose of WIOA youth services is to assist youth, (ages 14-21 if in-school youth; ages 16- 24 if out-of-school youth), who face significant barriers to education and/or employment by providing resources and support to overcome those barriers and successfully transition to self- sufficient adulthood. This is accomplished by first assessing a participant's skills, interests, needs, and goals, creating customized service plans in collaboration with the participant, and expanding the participant's connection to educational opportunities, the local economy, and community services. All youth metrics are linked together, there are no specific metrics for out- of-school youth. All the strategies below are designed to increase participation of and outcome achievement of Indiana's out-of-school youth population.

For out-of-school youth, WIOA services can be the primary connection point for these individuals with both the workforce development and social services systems. By leveraging WIOA Youth services for these Hoosiers, they can attain success in gaining access to occupational opportunities within the local economy.

In addition to broad state efforts, DWD takes an approach emphasizing local partnerships built around the 14 Youth Program Elements. Some in-school and out-of-school examples are described below.

1. Tutoring, study skills training, and dropout prevention strategies:

- Local programs may utilize their own strategies for individual tutoring or study skills training as appropriate and necessary. For example, Indiana's Rose-Hulman Institute of Technology operates the AskRose a homework help hotline for students statewide, a resource which is publicized and may be utilized by local areas

- Additionally, Indiana's Adult Education system serves as the catalyst for academic remediation services and/or preparation for the high school equivalency test for most of Indiana's out-of-school youth population.

2. Alternative secondary school services, or dropout recovery services as appropriate:

- Additionally, as previously noted, all local areas partner with their adult education providers, operated by the Indiana Department of Workforce Development for dropout recovery/ high school equivalency classes for youth participants. In local areas where other adult education providers exist, such as Goodwill's Excel Center (a re-engagement center), youth are enrolled, as appropriate.

3. Paid and unpaid work experiences, including summer employment and other opportunities throughout the year, pre-apprenticeship programs, internships, job shadowing, and on-the-job training opportunities:

- Indiana's local areas offer numerous work experiences (including summer employment, job shadowing, internships, and on-the-job training) at local employers for out-of-school youth. These work experiences range in length but are typically short-term and can last up to twelve weeks. Many work experiences include a "boot camp" or employability skills training prior to the start, as well as milestone trainings regarding the jobsite, industry, or individual's onsite performance. All work experiences include some form of academic and occupational education aligned with their placement and/or career pathway.

- As a promising practice, many local areas also provide training to employers and supervisors before and during the onsite work experience. Topics range from understanding youth culture, youth barriers, and activities designed to import strategies to make the experience successful for both parties.

4. Occupational skills training:

- Indiana offers multiple access points for out-of-school youth participants to seek occupational skills training that will result in an industry-recognized credential. These could include a specific training program selected by the youth based on their career interest and aptitude results and/or the State's sponsored short-term, in-demand industry training occupations accessed through Next Level Jobs and AE Integrated Education and Training (IET) program.

- Additionally, the State also includes apprenticeship programs, JobCorps, and YouthBuild in this program element

5. Education offered concurrently with and in the same context as workforce preparation activities:

- Local areas offer this program element, as appropriate, for youth who are enrolled in a postsecondary education opportunity (including those in credential programs) and may need a short-term work experience or employability skills training. This also includes local

"boot- camp" programs offered prior to short-term work experience, on-the job training, internships, or Adult Education's IET

6. Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors:

- Local areas offer this program element, as appropriate, through local partnerships with colleges and other leadership training programs or providers. Some such examples include the Boys and Girls Club, Junior Achievement, Shafer Leadership Academy, the Indiana National Guard, and more. One such LWDB has provided sub-contracts to the Boys and Girls Club and YMCA in their area to both fulfill this program element, but they are also service providers for other WIOA elements as well

7. Supportive Services:

Local areas offer this program element, as appropriate, to assist OSY meet goals developed through the objective assessment, through the following examples of assistance:

- Clothing assistance (potentially used for interviews, work experience, job placement, etc.) which could be in the form of a gift card to purchase work appropriate clothing or through a local partnership with a community-based organization such as Dress for Success,

- Transportation assistance (potentially used to participate in work experience, interviews, education or job placement, etc.), which could be in the form of gift cards for gas or through a local partnership with a community-based ride- share/transportation provider,

- Child and dependent care assistance (WIOA sponsored providers should be connected to CCDF or On-My-Way, when feasible based on available community supports),

- Referrals to medical services such as individual and/or group mental health counseling, or drug/alcohol counseling services when needed; typically created at the local level,

- Assistance with training materials such as books and equipment, which could be in the form of direct support to a bookstore or community college bursars' office, and

- Incentives for completion of participant goals

8. Adult mentoring:

- Local areas offer this program element, as appropriate, through connections with partner organizations like the Boys and Girls Club, Starfish Initiative, local postsecondary college and university students, or other organizations that specialize in mentoring teens and young adults. DWD works at a statewide level with the Indiana Youth Institute to connect LWDB's with high-quality mentor programs in their area; additional use of IYI's mentoring resources in the form of professional development and program creation are utilized when needed/available

9. Comprehensive guidance and counseling:

- Often, this program element is provided by the on-site youth case manager, especially for career and education counseling.

- However, if a youth, including an out-of-school youth, has a specific need for specialized counseling, local areas refer participants to drug and alcohol treatment facilities, mental health counselors and other organizations when appropriate.

- DWD works in collaboration with the Department of Mental Health and Addiction's youth focused team to provide training and share resources when available/appropriate for the out-of-school youth population

10. Financial literacy education:

- Local areas have developed partnerships with individual financial institutions and local banks to provide financial literacy training to participants, including out-of-school youth. These include, but are not limited to, InvestEd, Regions Bank, Old National Bank, PNC Bank, and more.

- Local areas also utilize online curriculum and tools to provide digital financial literacy education; examples include materials through EverFi, Allison.com, Consumer Financial Protection Bureau and FDIC Youth Guide to Financial Literacy

11. Entrepreneurial skills training:

- Local areas have established partnerships with their Small Business Administrations, Small Business Development Centers, State and local Chambers of Commerce, Ivy Tech's Cook Center for Entrepreneurship, and Junior Achievement as sources of curriculum, guest speakers, and mentors to youth participants, including out-of-school youth.

- Several local service providers have developed curriculum for this program element that focuses on the awareness and understanding of entrepreneurship and the steps to create a detailed business plan.

12. Services that provide labor market and employment information:

- Indiana operates a statewide career interest and work values website, Indiana Career Explorer, which provides all youth, including out-of-school youth, participants access to labor market information related to career pathways and Indiana specific in-demand occupations that align with their interests.

- Local areas have the ability to provide additional information and resources for this program element as appropriate

13. Activities that help youth prepare for and transition to post-secondary education and training:

- Local areas employ numerous tactics that are regionally specific. They include, but are not limited to, college fairs and visits, Financial Aid application nights, or college bridge programs.

- Statewide partnerships with organizations such as the Commission for Higher Education and InvestEd help inform youth, their case managers, parents, and mentors understand and navigate the financial aid and State scholarship application processes (such as 21st Century Scholars and Frank O'Bannon Scholarship).

- The Indianapolis-based YES (Youth Employability Skills) program is a statewide promising practice designed to recruit out-of-school youth through open hours at the Boys and Girls Club; youth are then matched with a REF (re-employment facilitator) to assess career interests, academic and employment goals, and then process through a mind-setting boot camp, with goals focused on student attainment of their high school equivalency diploma and/or entrance into training or employment

14. Follow-up services for not less than 12 months after the completion of participation:

- Indiana requires follow-up services for all participants to occur at least once every 90 days after exit.

- The types and duration of services provided may vary based on the needs of the individual, but may include leadership development and supportive services; regular contact with a youth's employer including assistance in addressing work-related problems; assistance in securing better paying jobs, career pathway development and further education or training; work-related peer support groups; adult mentoring; or services necessary to ensure success in post-secondary training.

The State's major partner for recruiting out-of-school youth and assisting them in achieving their goals is a partnership with Title II Adult Education programs. In the past two years, youth between the ages of 16-24 make up nearly 33% of the State's Adult Education enrollments, nearly all are drop-outs working on achieving their high school equivalency diploma. This partnership increases participation (enrollment and attendance) in both programs, as well as assisting in educating the out-of-school youth for preparation in career pathways and bridge short-term training programs with direct linkages to post-training employment.

At the State level, an ongoing partnership between Adult Education and youth department leadership has continued since 2014, where staff meet jointly on a bi-monthly basis or as needed, participate in monthly and annual training events, including the monthly Adult Education webinars, and annual Young Adult Services Summit, which provides professional development opportunities for out-of- school youth case managers. Local WorkOne staff participate in Adult Education program participant onboarding or welcome meetings and vice versa to ensure all participants are aware of the array of services available to them in both programs. Adult Education partners serve

on local standing youth committees and the statewide Youth Committee under the Governor's Workforce Cabinet.

In addition to partnership with Title II Adult Education programs, recruiting and referral to Vocational Rehabilitation has been a statewide focus since the implementation of WIOA. This partnership allows out-of-school youth with significant barriers to employment to access funding for both intensive and basic services to assist them in their pursuits. Joint statewide training, local staff meetings, and specific referral forms/personal hand-offs are just some of the strategies VR and the statewide WorkOne system have implemented to ensure out-of-school youth participant access to programming. VR partners serve on local youth standing committees.

Additional partnerships with the statewide community college system, foster care system and their service providers, Indiana Commission for Higher Education, Division of Mental Health and Addiction, Indiana Department of Child Services, Indiana Department of Education, and Indiana Department of Correction assist in helping local areas recruit potentially eligible out-of-school youth or provide them access to education or training funding and resources to assist them in completing goals related to education, training, and employment. State leadership serve on a variety of cross-agency committees and taskforces focused on bridging the gaps between agency programs designed to serve the State's most vulnerable youth populations, including youth in foster care, juvenile offenders, homeless youth, those with mental health issues, and/or economically disadvantaged.

3. *Describe how the State assists local workforce boards in implementing innovative models for delivering youth workforce investment activities, including effective ways local workforce boards can make available the 14 program elements described in WIOA section 129(c)(2); and explain how local areas can ensure work experience, including quality pre-apprenticeship and registered apprenticeship, is prioritized as a key element within a broader career pathways strategy.*

In 2015, Indiana issued an interim WIOA Youth Manual, which was subsequently finalized in 2016 and has been updated every year since implementation. The purpose of this manual is to provide consistent guidance, strategies, promising practices, and documents that can be used by local areas to implement WIOA youth services, both in- and out-of-school. The document includes many of the same strategies included in response to Question (c)(2) above but also details the process staff should use to recruit, determine eligibility, conduct an objective assessment, and maintain case files for each youth enrollment. Additionally, the DWD has issued policy (DWD Policy 2017-03, Change 2, DWD Policy 2017-10, Change 1, and DWD Policy 2018-01, Change 2 found at: https://www.in.gov/dwd/compliance-policy/policy/active/) surrounding requirements and effective practices for WIOA youth in the following areas:

- Eligibility Determinations, complete with definitions

- Work Experience program element, complete with definitions, guidance on fund expenditures and working with employer partners

- 14 Youth Program Elements, complete with definitions, requirements, and prohibitions; an updated version of this policy was issued in October 2021 to provide clarification on the provision of electronic devices as WIOA Youth Program supportive services and/or as an incentive.

With respect to pre-apprenticeships and registered apprenticeships, State, and local youth staff partner with DWD's Work-Based Learning and Apprenticeship Program to ensure program participants are aware of and have access to numerous work-based learning opportunities in this space, including certified pre-apprenticeship programs. These quality programs, created in direct partnership with local registered apprenticeship programs, offer both career exploration and direct entry opportunities into a strong career pathway.

4. *Provide the language contained in the State policy for "requiring additional assistance to enter or complete an educational program, or to secure and hold employment" criterion for out-of-school youth specified in WIOA section 129(a)(1)(B)(iii)(VIII) and for "requiring additional assistance to complete an education program, or to secure and hold employment" criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII). If the state does not have a policy, describe how the state will ensure that local areas will have a policy for these criteria.*

DWD Policy 2017-03, Change 2: Youth Eligibility states that "requires additional assistance to enter or complete an education program, or to secure and hold employment" for in- or out-of- school youth must be locally defined and does not include specific language for these definitions. WIOA allows States and/or local areas to define the requiring additional assistance criterion that is part of the Out-of-School Youth and In-School Youth eligibility. It clarifies that if this criterion is not defined at the State level and a local area uses this criterion in their Out-of-School Youth or In-School Youth eligibility, the local area must define this criterion in their local plan. Review of local plans and regular monitoring and oversight of policies and procedures will also support compliance with this element.

D. Single-Area State Requirements

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must include-

1. Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)

2. The entity responsible for the disbursal of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15).)

3. A description of the type and availability of WIOA title I Youth activities and successful models, including for youth with disabilities. (WIOA section 108(b)(9).)

4. A description of the roles and resource contributions of the one-stop partners.

5. The competitive process used to award the subgrants and contracts for title I activities.

6. How training services outlined in section 134 will be provided through individual training accounts and/or through contracts, and how such training approaches will be coordinated. Describe how the State will meet informed customer choice requirements regardless of training approach.

7. How the State Board, in fulfilling Local Board functions, will coordinate title I activities with those activities under title II. Describe how the State Board will carry out the review of local applications submitted under title II consistent with WIOA secs. 107(d)(11)(A) and (B)(i) and WIOA sec. 232.

8. Copies of executed cooperative agreements which define how all local service providers will carry out the requirements for integration of and access to the entire set of services available in the one-stop delivery system, including cooperative agreements with entities administering Rehabilitation Act programs and services.

N/A

E. Waiver Requests (Optional)

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

1. Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;

2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;

3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;

4. Describes how the waiver will align with the Department's policy priorities, such as:

A. Supporting employer engagement;

B. Connecting education and training strategies;

C. Supporting work-based learning;

D. Improving job and career results, and

E. Other guidance issued by the department.

5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and

6. Describes the processes used to:

A. Monitor the progress in implementing the waiver;

B. Provide notice to any local board affected by the waiver;

C. Provide any local board affected by the waiver an opportunity to comment on the request;

D. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.

E. Collect and report information about waiver outcomes in the State's WIOA Annual Report.

7. The most recent data available regarding the results and outcomes observed through implementation of the existing waiver, in cases where the State seeks renewal of a previously approved waiver.

COVER LETTER TO BE INSERTED AT FINAL SUBMISSION

State of Indiana WIOA Youth Waiver Request

Out of School Youth (OSY) Expenditure Requirement

Program Years 2026 and 2027

1. Identification of Statutory and/or Regulatory Requirements to Be Waived

The State of Indiana requests renewal of a previously approved waiver of Section 129(a)(4)(A) of the Workforce Innovation and Opportunity Act (WIOA) and its implementing regulation at 20 CFR 681.410. These provisions require that not less than 75 percent of WIOA Youth funds allotted under Section 127(b)(1)(c) and distributed to local workforce development areas (LWDAs) under Section 128 be expended on out-of-school youth (OSY).

Indiana seeks authority to reduce the minimum OSY expenditure requirement from 75 percent to 50 percent statewide; to align local area targets with the same 50 percent benchmark; and to apply the 50 percent OSY requirement to statewide youth activities funding for Program Years (PY) 2026 and 2027.

Absent renewal, LWDAs would be required to reduce ISY programming in order to meet the statutory threshold. This would limit early intervention strategies and weaken long-term workforce pipeline development. OSY services remain a priority and continue to receive substantial investment; however, maintaining a 75 percent threshold would significantly restrict local flexibility to sustain and modernize in-school youth (ISY) programming aligned with graduation support, career exploration, and early workforce attachment.

Approval of this waiver will ensure service continuity during PY 2026 and PY 2027 while strengthening performance-driven, career-focused youth models statewide within a fully WIOA-aligned framework as the State transitions from prior state-supported youth engagement models, including Jobs for America's Graduates (JAG).

2. Actions Undertaken to Remove State or Local Barriers to Waiver Implementation

Indiana has not identified statutory barriers that prevent implementation of the waiver.

As the State evolves its youth service delivery approach, this waiver will continue to provide local areas with the flexibility to design and deploy new school-based engagement strategies that are responsive to community-specific needs while remaining fully compliant with all federal WIOA program requirements.

State guidance will reinforce expenditure tacking requirements, documentation standards and performance accountability expectations to ensure responsible use of federal funds.

3. Description of the State's Strategic Goals

Indiana's youth strategy aligns with the State's core workforce development pillars established in the 2024-2027 WIOA State Plan: removing barriers for workers, preparing future skilled workers, and helping employers find and develop skilled talent. This strategy addresses both immediate workforce demands and long-term talent development by aligning youth programming with regional labor market demand, high-growth sectors, and the State's commitment to high-quality credential attainment as the primary driver of broad-based upward mobility.

The cancellation of Jobs for America's Graduates (JAG) funding represents both a transition point and an opportunity for strategic evolution aligned with federal workforce priorities. Indiana previously utilized JAG as its primary dropout prevention strategy for in-school youth. A key priority is the continued stabilization and strengthening of ISY services as the State shifts to a more fully integrated, WIOA-centered service model.

The 50 percent OSY expenditure waiver is essential to achieving Indiana's goals because it provides the fiscal flexibility necessary to recalibrate and maintain school-based youth services, within a fully compliant WIOA framework, without compromising OSY priority and performance. This approach allows Indiana to intervene early with eligible youth facing barriers before disconnection occurs, directly supporting the State's goal of building continuous talent pipelines from secondary education through post-secondary training and employment.

Flexibility at the local level remains critical to adapting services in response to shifting funding contexts and local needs. Programs for both ISY and OSY are aligned with Indiana's priority sectors and emphasize connecting young adults to high-wage, high-demand employment opportunities through work-based learning models. LWDAs may align WIOA Youth services with structured career coaching initiatives or similar school-based engagement approaches where these models exist locally. In such cases, WIOA Youth funds support eligible participants through documented case management, Individual Service Strategy (ISS) development, employer coordination, and performance tracking within a compatible framework, preserving early engagement and dropout prevention while strengthening accountability through the 14 WIOA Youth Program Elements.

The waiver preserves fiscal capacity for LWDAs to expand structured work-based learning opportunities tied to in-demand industry sectors through employer partnerships, to provide individualized barrier mitigation supports measured against WIOA performance indicators, and to maintain intensive ISY outreach, enrollment, and re-engagement services. Without this flexibility, the 75 percent OSY expenditure requirement would force LWDAs to significantly reduce or eliminate structured school-based interventions for eligible ISY, even when those interventions directly support WIOA performance outcomes and prevent future disconnection.

The waiver renewal also directly supports U.S. DOL's priorities under WIOA and aligns with the five pillars of America's Talent Strategy as follows:

- Industry-Driven Strategies: The waiver advances industry-driven talent development by enabling expanded employer-connected work-based learning models within both secondary schools and OSY programming. This builds reliable talent pipelines that respond to employer-defined skill requirements and prepares youth for immediate entry into high-wage, in-demand occupations upon training completion and credential attainment.

- Worker Mobility: Indiana's balanced OSY/ISY investment strategy enhances worker mobility by removing barriers to education and employment before they become entrenched. For ISY, the waiver enables early intervention that prevents disconnection, supports credential attainment, and ensures seamless transitions into postsecondary education, training, or employment. For OSY, the waiver preserves intensive case management and barrier mitigation services that bring disconnected youth back into the labor force and connect them with career pathways aligned with labor market demand. Indiana's focus on portable, industry-recognized credentials and competency-based assessments within both ISY and OSY services supports mobility across industries and advancement within career pathways.

- Integrated Systems: The waiver supports system integration by enabling Indiana to unify school-based youth services under the WIOA accountability framework rather than maintaining parallel service structures. Indiana coordinates WIOA Youth services with Title II Adult Education programs, Title IV Vocational Rehabilitation, and local education agencies to ensure seamless access to resources and wraparound services. The State's approach aligns with federal emphasis on coordinated service delivery where WIOA core programs work together with employers to arrange work-based learning opportunities. The waiver provides the flexibility necessary to sustain these partnerships and embed workforce development services within educational settings without fragmenting service delivery or creating duplicative administrative structures.

- Accountability: Indiana's waiver implementation reinforces performance accountability through multiple mechanisms. To operate in full WIOA compliance, school-based ISY services must adhere to federal and state standards for intake, service delivery, and

outcome reporting. This accountability framework ensures that waiver flexibility translates into measurable results for participants and taxpayers rather than simply expanding services without outcome focus.

- Flexibility and Innovation: The waiver itself represents the flexibility and innovation emphasized in America's Talent Strategy. Indiana is piloting performance-driven models, such as the Indiana Commission for Higher Education (CHE) Career Coaching Grants, that integrate workforce development into education settings while maintaining rigorous accountability standards, consistent with federal innovation guidance (TEGL 05-25) encouraging states to test new approaches that can adapt quickly to labor market changes.

Indiana does not anticipate a reduction in OSY enrollment or performance as a result of this waiver. Rather, the State expects that earlier, structured ISY engagement for eligible youth will strengthen long-term credential and employment outcomes, reinforce the overall youth workforce pipeline, and prevent future disconnection. The waiver supports innovation and local responsiveness while maintaining accountability, ensuring that Indiana's youth workforce system is positioned to meet the demands of a rapidly changing economy and to deliver measurable results for participants, employers, and communities across the state.

Indiana's balanced investment model ensures that both ISY and OSY participants remain connected to education, training, and employment pathways aligned with regional labor market demand. By preserving flexibility for school-based engagement within a WIOA-centered structure with this waiver, the State can expand early intervention strategies, strengthen employer partnerships, and increase access to structured work experiences that build sector-based skills.

4. Quantifiable Projected Programmatic Outcomes

Indiana anticipates that renewal of this waiver will support performance stability while preserving service capacity across youth populations. Under the approved 50 percent OSY threshold currently in place, the State has maintained balanced service delivery while meeting or exceeding federal performance indicators for median earnings, credential rate and MSG as noted below:

State of Indiana   *WIOA Youth PY 2024 Performance Outcomes*

	Negotiated	**Actual**
Employment 2Q	80.00%	78.50%
Employment 4Q	82.10%	80.10%
Median Earnings	$4,300.00	$4,980.00
Credential Rate	68.00%	69.20%

MSG	69.00%	77.30%

Through renewal of this waiver, Indiana anticipates maintaining strong performance across all primary WIOA Youth indicators while strengthening service alignment in the post-JAG funding environment.

Based on current performance trends and projected service stabilization, the State anticipates the following measurable outcomes over the waiver period:

- Credential Attainment: Maintain performance at or above 68.0 percent, with a targeted improvement range of 1–3 percentage points as credential pathway alignment and documentation practices are strengthened.

- Measurable Skill Gains (MSG): Sustain performance above negotiated levels, maintaining at or above 69.0 percent, recognizing current performance of 77.3 percent and the State's commitment to consistent milestone tracking.

- Work Experience Participation (ISY): Increase ISY participation in paid and unpaid work-based learning activities by approximately 5–10 percentage points as funding flexibility allows for expanded structured placements aligned with regional demand sectors.

- Employment 2nd Quarter After Exit: Return to and maintain performance at or above the 80.0 percent negotiated level through continued emphasis on work-based learning and industry alignment.

- Employment 4th Quarter After Exit: Return to and maintain performance at or above 82.1 percent, consistent with negotiated expectations.

- Median Earnings: Sustain earnings outcomes at or above current PY24 actual levels ($4,980), reflecting continued alignment with in-demand industry sectors.

ISY Enrollment Expansion

Indiana projects ISY enrollments among youth with barriers to education and employment to remain stable or to moderately increase by 1-5 percent over the waiver period. Target populations include youth in rural communities, youth with disabilities, youth in or aged out of foster care, youth experiencing homelessness, English language learners, and justice-involved youth.

- Current PY 2024 ISY enrollment baseline: 1,550 participants
- Projected ISY enrollment by end of waiver period: 1,565 – 1,628 participants

The waiver provides fiscal flexibility for LWDAs to invest in outreach, eligibility determination, and service delivery infrastructure within schools where these youth are already engaged. Indiana anticipates steady enrollment growth as LWDAs stabilize post-JAG service models and formalize partnerships with school counselors, special education coordinators, and community-based organizations serving youth with barriers.

OSY Enrollment Stability

Indiana assures that waiver renewal will not reduce OSY enrollment, service quality, or performance outcomes. The State will maintain or modestly increase OSY enrollment from current baseline levels.

- Current PY 2024 OSY enrollment baseline: 1,608 participants
- Projected OSY enrollment: Maintain at 1608 or achieve modest growth.

The State will maintain OSY expenditures at or above the 50 percent threshold in all LWDAs and preserve intensive case management and barrier mitigation services for disconnected youth.

Summary

By enabling earlier ISY intervention, the waiver supports a prevention-focused approach that complements rather than competes with OSY services, strengthening the overall youth workforce pipeline while maintaining robust services for currently disconnected youth. These projections reflect modest, incremental improvement and performance stabilization rather than significant performance expansion.

The State's intent is to preserve strong OSY services while strengthening ISY pathway alignment, ensuring that funding flexibility translates into measurable but sustainable performance gains. By preserving flexibility in youth formula funding distribution, LWDAs will be positioned to:

- Stabilize ISY service delivery in school-based settings,

- Expand structured work experiences aligned with career pathways,

- Maintain strong OSY engagement and compliance with federal priorities, and

- Sustain accountability across all WIOA Youth primary indicators.

Collectively, these quantifiable targets represent responsible stewardship of federal resources while reinforcing Indiana's commitment to balanced youth service delivery, performance integrity, and long-term workforce pipeline development.

Without waiver renewal, Indiana would face significant disruption to ISY services, reduction in work-based learning capacity, loss of school partnerships built over multiple program years,

decreased ability to serve youth with barriers, and potential performance declines as youth services become fragmented rather than unified under WIOA accountability.

5. Individuals, Groups, or Populations Benefiting or Impacted

The primary beneficiaries of this waiver are eligible ISY, particularly those meeting one or more WIOA-defined barriers to employment, including low-income status, basic skills deficiency, homelessness, foster care involvement, justice system involvement, disability, or other documented barriers.

Opportunity youth vulnerable to academic disengagement will benefit from structured work-based learning that reinforces classroom instruction through applied occupational exposure. These experiences promote career exploration, occupational skill development, and increased attachment to both school and the labor market.

Secondary beneficiaries include employers, educational institutions, community-based organizations and families who will benefit from stronger talent development pipelines and steady or improved youth outcomes.

6. Monitoring and Oversight Plan, Including Collection of Measurable Waiver Outcome Information

Indiana will continue fiscal and programmatic monitoring to ensure:

- Compliance with the 50 percent OSY expenditure threshold through quarterly expenditure reviews and annual reconciliation;

- Adherence to WIOA eligibility, documentation, and reporting requirements for all participants;

- Balanced investment across OSY and ISY populations with particular attention to preventing displacement of OSY services;

- Continuous performance improvement aligned with negotiated federal targets and state strategic goals.

Indiana Career Connect (ICC), Indiana's integrated case management system is configured to support the full integration of programs, eligibility determination, service recording, and performance tracking for WIOA, TAA, Wagner-Peyser, Veterans Employment and Training Programs, Registered Apprenticeships, and Reemployment Programs. The system has been designed to record service delivery information on every client service while providing transaction records necessary to document program performance, enabling real-time monitoring and cross-program data validation.

Performance outcomes will be reviewed regularly through LWDA monitoring visits, data validation processes, and quarterly performance reporting. The State will use these reviews to assess impact, provide targeted technical assistance, and inform future service design adjustments.

This strategy ensures that the objectives described above, as well as those outlined in the existing State and local WIOA plans, are consistent with established objectives of the WIOA, and federal and State regulations.

7. Public Comment and Notification Process

Indiana will ensure transparency and stakeholder engagement in the development and submission of this waiver renewal.

The draft waiver renewal request will be posted on the Indiana Department of Workforce Development (DWD) website as part of Indiana's Draft Unified State Plan and available for a 30 day public comment period of February 18, 2026 – March 20, 2026. A copy will also be maintained at DWD's central office for inspection upon request.

Stakeholders may submit written comments through multiple channels including email and U.S. postal mail. Indiana's LWDAs were notified of the state's intent to request renewal of this waiver and invited to share up-front input via email. Local areas will have access to the draft waiver and guidance on submitting feedback during the public comment period.

All submitted comments will be reviewed and considered prior to final submission. Indiana will incorporate relevant feedback to strengthen implementation strategies for ISY services, particularly in regions refining school-based engagement strategies and expanding complementary initiatives, such as career coaching grants and other locally driven youth engagement models.

Title I-B Assurances

	The State Plan must include assurances that:	
1.	The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes
2.	The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3.	The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4.	The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5.	Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	Yes
6.	The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes

7.	The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes
8.	The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9.	If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	Yes
10.	The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.	Yes
11.	The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3).	Yes

Wagner-Peyser Act Program (Employment Services)

A. Employment Service Staff

1. *Describe the State's staffing model for the provision of labor exchange services using State merit staff. States covered by 20 CFR 652.215(b) (Colorado, Massachusetts, and Michigan) must describe the staffing model the State will use to provide labor exchange services under the Wagner-Peyser Act, including outreach to MSFWs.*

Indiana's Wagner-Peyser program covers the full range of labor exchange activities in our WorkOne system. In the WorkOne centers (Indiana's term for American Job Centers), the Indiana Department of Workforce Development employs over 80 state-merit employees through Wagner-Peyser funding to provide these services. These employees work with partner staff who implement key components of the Workforce Innovation and Opportunity Act. Their tasks include, but are not limited to, initial client evaluation and assessment, job search assistance, re-employment assistance through the RESEA program, employer recruitment and other employer services. Indiana's Wagner-Peyser State merit staff are closely tied to our employers across the State and provide a full range of services directly to our employers to assist them in filling their open positions.

In addition to staff, the Wagner-Peyser grant provides tools for State staff and their partners to manage the labor exchange services necessary to match an employer with a potential employee. Some of these tools include Indiana's labor exchange system called Indiana Career Connect. Assessment tools to help employees and employers evaluate the skills needed for critical positions such as Indiana Career Explorer (INCE), WorkKeys, and Tests of Adult Basic Education (TABE) to name a few.

2. *Describe how the State will utilize professional development activities for Employment Service staff to ensure staff is able to provide high quality services to both jobseekers and employers.*

DWD will provide training to all staff providing employment services by using various media to accommodate different learning styles. These will include, but not be limited to, in-person training events, virtual events (webinars and other video recordings available online), self-paced instruction, procedure manuals, and best practices. DWD has a staff portal where all of these materials will be housed and accessible to all regional and DWD staff. Many training opportunities will also include step-by-step instruction guides with visual images incorporated into the guides. Additionally, with most of the training offerings being posted online, there is broader access for more partners within the One-Stop system. DWD will provide business systems and program training including the case management and labor exchange system, the business engagement system, and assessment programs/tools for WorkOne constituents.

All DWD employees have been given LinkedIn Learning licenses and Wagner-Peyser staff are assigned job-related training modules to complete as part of their performance expectations and staff development.

DWD's Career Exploration and Coaching staff has created a multi-faceted program to support agency career coaches as well as those in other state organizations or who are part of our community partners. Staff created a website of coaching resources, tools, professional development, labor market information and supporting organizations that have been visited by viewers from every state in the union. The site is updated regularly and found at https://www.in.gov/dwd/career-coaching.

Through education reimbursement and tuition assistance programs, DWD reimburses employees who complete post-secondary education courses and degree programs. This improves their general education, knowledge, and skills, to perform their jobs more effectively and advance their careers.

3. *Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance (UI) program and the training provided for Employment Services and WIOA staff on identification of UI eligibility issues and referral to UI staff for adjudication.*

Local area case managers are required to review eligibility requirements and inform participants that they are required to report any changes to their employment status and/or eligibility for UI. The UI division has published a variety of resources on identifying eligibility issues. These resources are accessible to case managers.

DWD and UI are working collaboratively to evaluate current awareness levels and are developing additional tools to guide ES and WIOA staff on UI issue spotting and adjudication referrals. One consideration discussed for raising awareness is having a UI representative present at quarterly operations meetings with Wagner-Peyser and WIOA leaders to discuss topical issues within UI. We plan to create standardized training that is updated annually or as needed to provide an overview of the program and train new and/or existing staff. Additionally, all RESEA staff are given annual training about how to detect potential issues that need adjudicated such as work search and availability. A Standard Operating Procedure is being created for RESEA staff to efficiently report UI eligibility issues using a Microsoft Form. RESEA leadership, from Workforce and UI, meet weekly to share information, strategize how to spread awareness, identify and solve training needs, and streamline processes.

B. Explain how the State will provide information and meaningful assistance to individuals requesting assistance in filing a claim for unemployment compensation through one-stop centers, as required by WIOA as a career service.

Indiana implemented technology solutions to help UI claimants with all aspects of their claim. These solutions were implemented in every one-stop comprehensive office across the State. The State identified designated computer terminals and phone lines (called UI kiosks) in every comprehensive office specifically for UI customers. The phones connect directly with the UI Contact Center for assistance with their claim. Any claimant that comes into a comprehensive office is directed to these kiosks and to the UI Contact Center for claim-related questions. Claimants may call the UI Contact Center to ask UI questions, file a claim by phone, or file a weekly voucher by phone.

The State also assists clients through a marketed toll-free phone number which is available to the public. All partners have been informed of this hotline and are encouraged to refer clients for all UI related services. The Employment Services staff in the regions also provide over-the-shoulder help to UI claimants as they are navigating the claims filing system.

DWD adopted the *ID.me* identity verification service in response to a large increase in UI claim fraud during the COVID pandemic. Smartphones were provided to a Wagner-Peyser funded staff person in each comprehensive WorkOne along with training for them and other staff on assisting customers with the *ID.me* process.

C. Describe the State's strategy for providing reemployment assistance to UI claimants and other unemployed individuals.

Indiana provides comprehensive statewide reemployment assistance that seeks to support all claimants in returning to work as quickly as possible in high-wage, high-demand jobs. Indiana operates Initial RESEA, and a follow-up meeting if appropriate, to meet the needs of eligible claimants.

The program introduces unemployed Hoosiers to WorkOne services and training opportunities during self-led video orientation and 1:1 Initial Interview, and provides access to additional reemployment services, as appropriate. The program provides claimants the opportunity to learn about reemployment services and activities available through the WorkOne centers. Both Initial RESEA and the need-based follow-up were designed to help UI claimants return to work sooner and enter a high-wage, high-demand career path; reduce weeks of unemployment; improve the solvency of the UI trust fund; and reduce fraudulent UI claims. Program participation is mandatory upon selection, unless the claimant qualifies for a Manual RES Waiver based on one of the following reasons: moved out of State, currently enrolled in State-approved training, returning to work date within 60 days of separation, or is a member in good standing with a Union Hiring Hall.

The State of Indiana's reemployment strategy consists of the following: After UI claimants have received unemployment and continue to file a weekly voucher, they are selected for Initial RESEA through WPRS profiling. Claimants are sent a notification to participate. Claimants are scheduled through Indiana's case management system to participate in RESEA services through one of the WorkOne centers usually between four and six weeks after they receive unemployment benefits. Selected participants are required to watch orientation videos and attend a 1:1 Initial Interview to learn of available WorkOne services and additional program requirements which include:

1. Claimants meet one-on-one with a RESEA Coach to receive current Labor Market Information (LMI),

2. Enrollment in Indiana's Labor Exchange System - Indiana Career Connect,

3. Creation of Individual Reemployment Plan (IRP),

4. Maintaining log of weekly work search activities, and

5. Referral to additional reemployment services.

Claimants are also required to attend follow-up meetings as scheduled to review progress and make necessary adjustments to the IRP until employment is obtained.

Indiana is piloting virtual services for RESEA appointments in several of its regions. We intend to expand virtual offerings during the program year 2026.

D. Describe how the State will use Wagner-Peyser Act funds to support UI claimants, and the communication between the Employment Service and UI, as appropriate including the following:

1. Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act;

Indiana's Wagner-Peyser and UI staff are connected within the same agency and partner together to support claimants throughout their engagement. Indiana has integrated systems that allow Wagner-Peyser registration to occur between UI and the State's Labor Exchange and Case Management System. Additionally, claimants have labor exchange access through both self-service and within any of the WorkOne.

2. Registration of UI claimants with the State's employment service if required by State Law;

Indiana code IC 22-4-14-2 requires UI claimants to register with Indiana's Employment Service. Indiana has developed automated and manual registration processes for claimants to ensure service delivery is seamless and readily available.

3. *Administration of the work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants; and*

Wagner-Peyser and WorkOne RESEA staff facilitate the administration and initial review of the UI eligibility assessment/working test for claimants. Wagner-Peyser and WorkOne staff refer specific eligibility concerns to UI adjudication if the automated UI issue system may not identify the issue.

WorkOne staff conduct one-on-one meetings with claimants to develop and update their IRP and provide reemployment services and referrals to training programs based on an individual's needs, interests and aspirations, and barriers to employment. WorkOne staff also encourage UI claimants before or during their RESEA program to engage in other workforce programs, as appropriate.

4. *Provision of referrals to and application assistance for training and education programs and resources.*

WorkOne staff conduct one-on-one meetings with claimants to develop and update their IRP and provide reemployment services and referrals to training programs based on an individual's needs, interests and aspirations, and barriers to employment. WorkOne staff also engage UI claimants before or during their RESEA program to engage in other workforce programs, as appropriate.

E. Agricultural Outreach Plan (AOP)

Each State agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of WIOA. The AOP must include:

1. Assessment of Need: Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

The assessment of need is based on direct observations of farmworker activities by DWD outreach, program, and Employer Services staff. To identify Indiana's primary crops and national rankings, DWD partners with the Indiana State Department of Agriculture (ISDA) and the United States Department of Agriculture (USDA) to collect and utilize relevant data.

While the DWD collaborates with the ISDA and USDA on data initiatives, each agency maintains a distinct focus. DWD primarily supports Migrant and Seasonal Farmworkers (MSFWs) by ensuring fair housing, safe working conditions, legal rights, and access to employment services. ISDA concentrates on economic development, soil conservation, FFA, and grain buyer licensing. DWD will continue identifying collaborative opportunities to leverage both agencies' strengths, specifically in conducting outreach to farmers and corporations regarding worker upskilling and MSFW awareness. By utilizing ISDA's established employer relationships, outreach staff can connect with MSFWs more efficiently. Both agencies will examine additional strategies to leverage mutual activities.

The needs of these farm workers and farmworker families range from employment, housing, and education-related to non-agricultural job training and education.

- **Employment:** Farmwork in Indiana is highly seasonal — peak activity runs from roughly March through November, with intense demand for manual labor in planting, detasseling, weeding, and harvest. Many farmworkers have unstable income because work is tied to crop cycles, weather conditions, and worker availability. Workers frequently need support transitioning to non-agricultural employment in off-seasons or for long-term career development and language services and GED prep are essential for career mobility.

- **Housing:** Seasonal and migrant farm workers often need housing close to work, but housing quality varies widely. Inspections sometimes reveal issues like broken wiring, plumbing problems, or inadequate sanitation. Because work is temporary and tied to crop seasons, securing year-round housing can be difficult, leading to instability and family disruption.

- **Healthcare:** Agriculture is inherently risky: long hours in extreme weather, exposure to pesticides, machinery, and repetitive physical tasks raise injury and chronic health risks. Many farm workers lack health insurance or regular access to medical care. Continuity of

care is challenging for migrant workers because mobility disrupts long-term relationships with providers. Social isolation, fear of enforcement, economic precarity, and separation from family contribute to mental health challenges.

- **Education:** Access to educational programs — English learning, literacy, and certification training — directly impacts earning potential and quality of life. Farm workers, particularly those on H-2A visas, have limited awareness of labor protections and complaint processes. Outreach is necessary to inform them of their rights and how to report violations. Cases in Indiana have uncovered wage theft and poor housing conditions for H-2A workers, highlighting the need for stronger legal support and enforcement.

- **Transportation:** Farms are frequently remote, and workers may lack personal vehicles, public transit access, or legal driver's privileges. This inhibits access to healthcare, groceries, banking, and community services.

2. *Provide an assessment of the agricultural activity in the State: 1) identify the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity; 2) Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce); and 3) Identify any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will effect agriculture in the State.*

1. Identify the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity.

The needs of farm workers in Indiana have remained strong from year to year due to consistent crops, overall agricultural production, and planting and harvesting cycles. The top five labor intensive crops in Indiana are corn, tomatoes, melons, pumpkins, and strawberries.

The majority of the farmwork activity in the State occurs in the northwest, central, and southern regions of the State with pockets near the following counties: Adams, Madison, Vigo, Sullivan, and Knox counties. Peak season in Indiana is March to mid-November.

2. Summarize the agricultural employers' needs in the State (i.e., are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce).

Growers are still expressing a shortage of U.S. Domestic workers and are moving towards hiring foreign workers. Last fiscal year (Oct. 1, 2024, to Sept. 30, 2025), the Indiana State Workforce Agency (SWA) processed 301 agricultural clearance orders. The total amount of H2A workers requested in Indiana for the year of 2025 is 6,090 H2A workers. DWD will increase collaboration and communication with the ISDA to extend its outreach efforts and impact for MSFWs.

3. Identify any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State.

Even though agriculture in Indiana contributes an estimated $35.1 billion to the economy, growers are still expressing a shortage of hiring local domestic workers and are moving towards hiring foreign workers. Last fiscal year (Oct. 1 to Sept. 30, 2025), the Indiana State Workforce Agency (SWA) processed 301 agricultural job orders. We have seen an increase in foreign workers in all types of agricultural commodities. Agricultural employers are hiring truck drivers, construction workers, agricultural equipment operators, and mechanics for agricultural work.

For the last couple of years, there have been warmer winters, wetter springs, and hotter summers. This may result in increasing weed, pests, and disease in Indiana's agricultural production. Some migrant workers could be hesitant to travel due to fear of facing another low production year.

3. *Provide an assessment of the unique needs of farmworkers by summarizing Migrant and Seasonal Farm Worker (MSFW) characteristics (including if they are predominantly from certain countries, what language(s) they speak, the approximate number of MSFWs in the State during peak season and during low season, and whether they tend to be migrant, seasonal, or year-round farm workers). This information must take into account data supplied by WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, other MSFW organizations, employer organizations, and State and/or Federal agency data sources such as the U.S. Department of Agriculture and the U.S. Department of Labor Employment and Training Administration.*

During Program Year 2024 (July 1, 2024, to June 30, 2025) the number of MSFWs that the State's outreach program was able to locate through outreach efforts was 6,461. The majority of these farm 13,500 workers. MSFWs in Indiana are predominantly from Mexico, with an increasing number of workers from Haiti and South Africa. MSFWs from Mexico and Haiti speak Spanish and Creole, and those from South Africa speak English.

4. *Outreach Activities: The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:*

Indiana's outreach strategies are designed to ensure that local offices outreach activities meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. The following sections outline DWD's strategies.

A. *Contacting farm workers who are not being reached by the normal intake activities conducted by the employment service offices on an ongoing basis. The plan must identify the number of full-time and part-time outreach staff positions in the State and must demonstrate that there are sufficient outreach staff to conduct MSFW outreach in each service area of the State and to contact a majority of MSFWs in the State annually. The plan must explain the materials, tools, and resources the SWA will use for outreach.*

Indiana uses dedicated outreach staff, partnerships with MSFW service organizations, and field engagement—to contact farmworkers who are not reached through standard Employment Service intake. These efforts focus on meeting workers where they are, educating them about workforce services, and helping them access employment, training, and related support. During peak season, the outreach specialist conducts joint outreach to significant large numbers of MSFWs with the following agencies: the U.S. Department of Labor Wage and Hour Division (WHD), Migrant Education Program, Indiana Legal Services, The National Farmworkers Jobs Program (NFJP), and the Mexican Consulate. Additional partnerships and stakeholders are sought throughout the year to expand on the outreach plan for the upcoming season. The Migrant Education Program is under the umbrella of the Indiana Department of Education (DOE). This program provides education services to MSFWs year-round. DWD and DOE staff conduct joint outreach every year.

B. *Providing technical assistance to outreach staff.*

Recently, the State's outreach program has been working on a systematic approach for engaging MSFWs for services at our local WorkOne. A weekly report from Indiana's labor exchange/case management system is completed in search of MSFWs who have completed a registration within the system. As part of our outreach efforts, staff communicate with potential MSFWs to determine if they fall into this category. They also inquire about the type of farm work being performed and update their employment history to reflect the seasonal farm work. During this communication, the outreach specialist provides an overview of the employment and training opportunities available at the nearest WorkOne and a brief overview of farmworker rights, along with awareness of the complaint system process.

The SWA provides opportunities for staff to participate in local events within the community of MSFW service and support agencies and groups. This allows our outreach staff to learn about new programs and services as well as leverage and build partnerships.

The SWA schedules a pre-season meeting (late February) and a post-season meeting (mid-November), which are led by the State Monitor Advocate (SMA). At these meetings the SMA will connect with all outreach staff as well as the twelve workforce regions to provide training on several topics, such as: identifying and determining MSFWs at the local WorkOne, an

overview/refresher of the complaint system, farm labor contractor registrations, terms, and conditions of employment for all agricultural job orders and raising awareness in the form of presentations from other MSFW agencies. These pre and post season meetings provide technical assistance to the outreach staff in building stronger connections and collaborations with the WorkOne Centers.

C. *Increasing outreach staff training and awareness across core programs including the UI program and the training on identification of UI eligibility issues.*

The SWA has translated the UI Claimant Handbook and the Filling for Unemployment Insurance brochure into Spanish and Creole languages, increasing its access and use among Indiana's MSFW population. These resources provide MSFWs with a better understanding of the UI program and allow advocacy staff to articulate the UI process with this information. This will better prepare MSFWs in applying for UI.

Indiana designated UI computers in the one-stop comprehensive centers to help UI claimants with questions and/or issues about their claims. Staff direct claimants to use the computers, which connects them directly with a UI customer service representative at the call center. The UI call centers do have bi-lingual staff available for Spanish speakers. For languages besides Spanish, the call center uses the State's QPA vendor for interpretation services.

The Reemployment Services and Eligibility Assessments Program (RESEA) worked with the SWA and SMA to identify MSFWs within the program. RESEA forms and documents are available in the Spanish and Creole language for MSFWs who are English Learners.

Indiana's approach to increasing outreach worker training and awareness across core programs, including UI, includes structured training initiatives, co-location with WorkOne offices, translated outreach materials, ongoing professional development, and collaborative training with partner agencies. These strategies help ensure outreach workers can connect them to the full range of workforce services.

D. *Providing outreach staff professional development activities to ensure they are able to provide high quality services to both jobseekers and employers.*

State merit outreach staff have two mandatory annual trainings, human trafficking, and sexual harassment, followed by ongoing in-house professional development trainings throughout the year. All DWD employees have been given LinkedIn Learning licenses and Outreach staff are assigned job-related training modules during non-peak season to complete as part of their performance expectations and staff development. DWD also provides training to all ES staff by making use of various media to accommodate different learning styles. These include, but are not

limited to, in-person training events, virtual events (webinars and other video recordings available online), self-paced instruction, procedure manuals, and best practices.

> E. *Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.*

SWA Outreach Staff work closely with NFJP grantees and key partners—including the Mexican Consulate, Migrant Education Program, Department of Wage and Hour, and Indiana Legal Services—to identify and meet the needs of Migrant and Seasonal Farmworkers (MSFWs). We will maintain these partnerships and collaborate with community organizations, such as food pantries and soup kitchens, to deliver essential resources to Indiana's MSFW population.

> 5. *Services provided to farmworkers and agricultural employers through the one-stop delivery system. Describe the State agency's planned activities for:*
> A. *Providing the full range of employment and training services to the agricultural community, including both MSFWs and agricultural employers, through the one-stop delivery system. This includes:*
> > i. *How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers; and*

Indiana utilizes its WorkOne One-Stop Career Centers as the primary hub for delivering WIOA Title I career and training services to migrant and seasonal farmworkers. These centers provide full access to job search help, training referrals, and individualized assistance, supported by targeted outreach and the Monitor Advocate system to ensure equitable access for MSFWs, including those who may not otherwise visit a center.

> > ii. *How the State serves agricultural employers and how it intends to improve such services.*

Agricultural employers often face labor challenges, especially for seasonal or temporary workers. Indiana supports them through the Agricultural Recruitment System (ARS) WorkOne centers offer referrals, job search support, and training links that help both workers and employers. DWD plans to train staff across workforce regions to better support agricultural employers with recruitment and labor services.

B. *Marketing the Complaint System to farmworkers and stakeholders.*

DWD markets the Employment Service Complaint System to farmworkers and advocates through direct field outreach, coalition building, and partner training. To ensure accessibility, all local workforce offices display posters listing local complaint representatives in both English and Spanish. Additionally, DWD promotes the U.S. Department of Labor's resources at MigrantWorker.gov and TrabajadorMigrante.gov to ensure workers are informed of their rights.

C. *Marketing the Agricultural Recruitment System for U.S. Workers to agricultural employers and how it intends to improve such publicity.*

DWD continues to help agricultural employers meet their labor needs. When local workers are unavailable, the SWA provides technical assistance to help growers access the interstate Agricultural Recruitment System (ARS). We are also building a partnership with the ISDA to increase awareness among agricultural organizations. Furthermore, our staff is trained to assist farm labor contractors with U.S. Department of Labor certification applications. The SWA will provide ARS and Agricultural Employer Service training to Employment Service staff. This training will involve posting jobs on Indiana's labor exchange system (Indiana Career Connect), conducting recruitment events, and familiarizing staff with employment terms and conditions.

ARS marketing to agricultural employers is centered on direct outreach, educational presentations, business services support, staff training, and partnerships with agriculture organizations. The state plans to increase awareness and usage by improving workforce staff capacity, leveraging trusted agricultural networks, and making ARS services easier for employers to understand and access.

6. *Other Requirements*
   A. *Significant MSFW One-Stop Center Staffing. If the SWA has significant MSFW one-stop centers, describe how the SWA intends to provide ES staff in the significant MSFW one-stop centers in accordance with 20 CFR 653.111.*

DWD will ensure its Significant MSFW One-Stop Center, located in Vincennes, Indiana, has the appropriate technology to allow for MSFWs to connect virtually with employment services staff. Additionally, we have an outreach staffer physically stationed in this office and can provide employment services on a part-time basis when not engaged with outreach (non-peak season).

   B. **_Collaboration_**: *Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new*

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partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

The SWA has three collaborative agreements or Memoranda of Understanding (MOUs) with the following entities:

1. A monetary MOU with the Indiana State Department of Health (ISDH) for pre-occupancy farm worker housing inspections

2. NFJP Proteus Inc., as mandated by TEGL 8-17

3. Indiana Wage & Hour Division

DWD contracts the Indiana State Department of Health and its inspectors to conduct pre-occupancy farm worker housing inspections. This monetary MOU outlines the roles and responsibilities of each party regarding the housing inspections in the State of Indiana. The SWA will continue to partner with ISDH over the next two years and will renew the MOU on or before September 30, 2026.

The State Monitor Advocate (SMA) will continue to partner and collaborate with National Farmworker Jobs Program (NFJP) as per TEGL 8-17, with the required non-monetary MOU between State Monitor Advocates and National Farmworker Jobs Program (NFJP) grantees. This non-monetary MOU establishes a pathway to ensure that MSFWs will have access to career pathways, job training, and other supportive services offered between the two parties. This partnership will continue to work together within the next four years by conducting joint outreach to MSFWs, data collecting, attending meetings, SMA providing complaint system training and any other events deem necessary. The non-monetary MOU is valid between July 1, 2025, and expires on June 30, 2027, with renewal options evaluated by June 30, 2026. Therefore, as the Indiana Department of Workforce Development (DWD) engages with other migrant and seasonal farmworker agencies, new partnerships are created along with new agreements.

DWD created a MOU between DWD & Wage and Hour Division (WHD). This Non-Monetary runs from December 10, 2023 to December 10, 2028 October 2024 to September 2027 and allow for joint outreach to be conducted when appropriate and assists the SMA with information sharing in regard to Agriculture employers, exchanging investigative leads, complaints, and referrals of possible violations, to the extent allowable by law or policy.

C. ***Review and Public Comment***: *In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons therefore; and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.*

   i. *The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.*

In accordance with 20 CFR Subpart B, 653.107 & 108 (4), the State Monitor Advocate participated in the preparation of the agricultural plan and has been afforded the opportunity to approve and comment on the plan. Such review indicates that the plan has been prepared properly, omitting none of the prescribed requirements, and properly describes the activities planned for providing services to both agricultural employers and migrant seasonal farm workers.

The State Workforce Agency (SWA) emailed all Indiana Migrant & Seasonal Farmworker Coalition members, including the National Farmworker Jobs Program (NFJP) partners, to solicit feedback on Indiana's Strategic Plan and Agricultural Outreach Plan (AOP). In addition to direct outreach, the plan will be posted on DWD's website for public comment. Following the review and consideration of input from stakeholder Proteus, DWD will submit the final plan.

D. ***Data Assessment***: *Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.*

Indiana has achieved its equity goal for the most recent three program years to ensure MSFWs receive quantitatively proportionate services compared to non-MSFWs.

Program Year 2021 Equity Indicators	1-Referred to Jobs	2-Provided with a Service	3-Referred to Supportive Services	4-Provided with Career Guidance	5-Job Development Contacts	Achieved Equity
MSFWs	16.67%	100%	38.10%	54.76%	19.05%	
NON-MSFWs	21.55%	97.95%	8.85%	41.42%	10.21%	
	.77	1.02	4.3	1.3	1.8	NO
Program Year 2022 Equity Indicators	1-Referred to Jobs	2-Provided with a Service	3-Referred to Supportive Services	4-Provided with Career Guidance	5-Job Development Contacts	Achieved Equity
MSFWs	38.20%	98.88%	28.09	43.82%	19.10%	
NON-MSFWs	15.22%	97.54%	7.07%	36.97%	11.21%	
	2.50	1.01	3.97	1.18	1.70	YES
Program Year 2023 Equity Indicators	1-Referred to Jobs	2-Provided with a Service	3-Referred to Supportive Services	4-Provided with Career Guidance	5-Job Development Contacts	Achieved Equity
MSFWs	25.68%	74.32%	25.68%	70.27%	9.46%	
NON-MSFWs	12.64%	49.97%	7.23%	40.04%	10.31%	
	2.03	1.58	3.55	1.75	0.91	YES

Program Year 2024 Equity Indicators	1-Referred to Jobs	2-Provided with a Service	3-Referred to Supportive Services	4-Provided with Career Guidance	5-Job Development Contacts	Achieved Equity
MSFWs	10.13%	62.03%	15.19%	55.70%	5.06%	
NON-MSFWs	8.06%	43.55%	8.70%	37.76%	7.24%	
	1.25	1.42	1.74	1.47	0.69	YES

E. **_Assessment of Progress_**: _The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year._

Many achievements were made at the SWA level since the previous AOP. We have retained two full-time outreach staff. Additionally, the SWA developed policies and procedures that support MSFW services in the WorkOne centers, while providing technical guidance on how to increase service levels. Scheduled PY24-25 trainings include: MAS Refreshers, FLC Registrations, and ARS. To improve performance, the SWA will focus on increasing referrals to clearance orders, improving job placements, and strengthening local recruitment for agricultural employers throughout PY24 and PY25.

The SWA has developed a Self-Assessment tool to determine success in reaching goals and to identify deficiencies to improve performance. Implementation will begin in PY25.

F. **_State Monitor Advocate_**: _The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP._

The Indiana State Monitor Advocate reviewed and approved the SWA's Agricultural Outreach Plan (AOP).

Wagner-Peyser Assurances

	The State Plan must include assurances that:	
1.	The State will provide labor exchange services under the Wagner-Peyser Act using State merit staff.	Yes
2.	The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time. (sec 121(e)(3));	Yes
3.	If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services. Adult and Dislocated Worker programs and Youth Programs under Title I; and	Yes
4.	SWA officials: 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans; 5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to Agricultural Recruitment System and did not come into compliance within 5 calendar days.	Yes
5.	The SWA has established and maintains a self-appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).	Yes

Adult Education and Family Literacy Act Program

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

A. Aligning of Content Standards (WIOA section 102(b)(2)(D)(ii)(I))

Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The College and Career Readiness Content Standards (CCR) form the instructional foundation of Adult Education program. The CCR standards are used to identify academic skills that students need to know and be able to do. A career-infused classroom integrates contextualized instruction aligned to the CCR Standards with career awareness, self-exploration, career exploration, and career planning.

In Indiana, Adult Education providers are expected to provide standards-based instruction using the College and Career Readiness Standards. The gap between the knowledge and skills of adult learners and the expectation of colleges, training programs, and employers drives the movement to standards-based education. The standards were created as a manageable set of foundational knowledge indispensable for addressing this gap and preparing adult learners for college and careers. Additionally, the standards provide direction on where to focus instruction, a coherent framework for scaffolding student learning, and consistent expectations across the State.

In mathematics, for example, the standards reflect content typically taught in both beginning and more advanced algebra and geometry courses, as well as in data analysis and statistics classes. The ELA/literacy standards demand robust analytical and reasoning skills and strong oral and written communication skills. The integration of CCR standards into adult education programs is intended to provide all adult students with the opportunity to be prepared for postsecondary training without needing remediation. Integrating these standards into instructional delivery is essential to enabling adult learners to meet the real-world demands of postsecondary training and employment leading to high-demand careers in growth industries.

B. Local Activities

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

Adult Education and Literacy Activities (Section 203 of WIOA)

- *Adult education;*

- *Literacy;*

- *Workplace adult education and literacy activities;*

- *Family literacy activities;*

- *English language acquisition activities;*

- *Integrated English literacy and civics education;*

- *Workforce preparation activities; or*

- *Integrated education and training that-*

    1. *Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and*

    2. *Is for the purpose of educational and career advancement.*

Special Rule. *Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.*

The Indiana Department of Workforce Development (DWD) solicits applications and proposals from entities eligible to receive WIOA Title II funds. Applicants can apply for funding in several areas that include adult education and literacy activities – WIOA Title II (per 29 USC §3272); adult high school credit program/competency-based high school diploma program/adult secondary credit (ASC); corrections education and education for institutionalized individuals; integrated education and training activities (IETs); workforce education initiative (WEI); and/or Indiana online only distance education.

An eligible individual is an individual who is 16 years of age or older; who is not enrolled or required to be enrolled in secondary school under State law; who is basic skills deficient; does not have a

secondary school diploma or its recognized equivalent and has not achieved an equivalent level of education; or is an English language learner.

DWD competes funds in accordance with 34 CFR section 463 Subpart C.

To be awarded WIOA Title II funds in Indiana, applicant organizations must be an eligible provider as defined by WIOA (per 29USC §3272). An applicant must be able to demonstrate past effectiveness in providing adult education and literacy activities before the applicant can be considered an eligible applicant. Data which demonstrate the applicant's effectiveness in providing adult education and literacy services include evidence of eligible individuals' academic gains (reading, writing, mathematics, or English language acquisition), employment outcomes, family literacy, attainment of secondary credentials, transitions to postsecondary education, and workforce training.

Application materials include a separate data collection tool to ensure how past effectiveness is determined so that all eligible providers are treated fairly in grant competitions. Applicants that do not have performance data under WIOA section 116 may demonstrate previous effectiveness in servicing basic skills deficient eligible individuals, including evidence of success in achieving the outcomes listed above. In the case of applicants applying as a consortium, each member of a consortium must provide performance data to demonstrate effectiveness. Application materials clearly identify how many years of demonstrated effectiveness data an applicant must submit in the application.

Indiana conducts its review of applicant eligibility to determine if an application is from an eligible provider of demonstrated effectiveness by utilizing a "yes" or "no" determination. The State screens each application to determine if it is from an eligible provider of demonstrated effectiveness and only applications that are determined to be from eligible providers of demonstrated effectiveness are forwarded for review, scoring, and consideration for funding. Similarly, all sub-recipient members must be determined to be an eligible provider of demonstrated effectiveness in order for the consortium application to be forwarded for review, scoring, and consideration for funding.

Applicants that are determined to be ineligible for funding because they were not determined to be eligible providers of demonstrated effectiveness are notified.

In the State's multi-year adult education competitive grant application (request for application), all applicant organizations should complete all questions listed under each consideration (I-XIII, XIV) regardless of the type(s) of funding the applicant is seeking. All applicant organizations should address Consideration XIV [General Education Provisions Act (GEPA)]. Considerations I-XIII represent the thirteen statutory considerations DWD must consider when awarding WIOA Title II funds, while Consideration XIV, which is state-imposed, is used to meet the statutory GEPA plan required for all AEFLA funded sub-recipients. The State may also require additional State considerations to be completed. Failure to provide answers for the narrative portion of the application is grounds for non-consideration.

To fund eligible providers, a rubric is utilized to score the narrative section for the thirteen considerations. Review teams utilize a 0–5-point Likert Scale to score the quality of each response. Reviewers provide notes or commentary to justify the score, provide brief details of what the applicant omitted or missed, and brief descriptions of anything "positive" about the application.

5 – Excellent; Applicant's response clearly demonstrates an understanding of the question, the consideration, and the challenges and expectations of an adult education provider.

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2 – Poor; Answer is not well supported and does not demonstrate what would be expected out of an adult education provider.

1 – Bad; Answer lacks any context or support, and in no way demonstrates what would be expected out of an adult education provider.

0 – Incomplete; Applicant made no attempt to answer the question.

DWD utilizes overall scores, quality of grant submissions, and responses to the thirteen considerations and any State considerations to fund eligible providers. Additionally, the State reviews funding requests and proposed service delivery areas to ensure that every county in the State is covered.

DWD awards multi-year adult education grants on a competitive basis, beginning with program year 2024 (July 1, 2024, through June 30, 2025), and ending PY2029 (July 1, 2029, through June 30, 2030). After the initial year of this multi-year adult education grant award (PY2024), DWD requires sub-recipients apply for the renewal of funding through a non-competitive grant continuation for the following program years: PY2025; PY2026; PY2027; PY2028; PY2029.

Funding is allocated and distributed at the state level as prescribed by Title II, Adult Education and Family Literacy Act (AEFLA):

1. Not less than 82.5 percent of the grant funds are dedicated for awards under section 231 and to carry out section 225, Programs for Corrections Education and Other Institutionalized Individuals, of which not more than 20 percent is available to carryout section 225;

2. Not more than 12.5 percent of the grant funds are applied to carryout state leadership activities under section 223; and

3. Not more than five percent of the grant funds are set aside for administrative expenses of the eligible agency.

In making initial award determinations during the first year of a multi-year grant, DWD will take into consideration each applicants:

1. Accomplishments and progress toward goals;

2. Capacity and efficiency in service delivery;

3. Gaps and barriers that limit participation; and

4. Employment and labor market demands.

Based on state priorities, funding is prioritized and grants are awarded, in part, to:

1. Organizations that have demonstrated effectiveness in improving the literacy of eligible individuals, especially participants who have low levels of literacy;

2. Organizations with services that are aligned with local workforce strategies, priorities, and partners; and

3. Organizations with services that are responsive to the needs of persons with barriers to employment.

Data is aggregated at the economic development regional level to determine the total amount of funds available for the region. Applicants apply for a region or a portion of the funds available in each region they intend to serve. To award funds, DWD considers the score and rank of proposals in a regional workforce area to allow for a diversity of programs geographically.

Total funding requested may vary depending upon program size, population (anticipated enrollment), demonstrated need, capacity, and number of subgrants within a service area. DWD distributes funding based on this review, attempting to fund as many applicants meeting minimum benchmarks in each area. State statute requires that at least 25 percent of the funding appropriated by the general assembly for adult education and literacy activities be used for workforce programming.

DWD reserves the right to award grant funds in amounts different from the applicant's initial budget request. Adjustments may be based on how the proposed budget and budget narrative covers program expenses and whether the requested amount is proportionate to the number of participants projected or previously served based on previous performance.

For DWD to maintain the federally required Maintenance of Effort (MOE), Indiana requires that WIOA-funded Adult Education providers contribute a local match.

In continuation years, the allocation of funds takes into account past performance as a basis for an increase or decrease in funds. Considerations include enrollment, measurable skills gains, high school equivalency attainment, and the number of industry-recognized credentials attained by students. Providers that achieve all or a percentage of state-defined performance goals may also qualify for additional funding for outstanding performance during a program year.

DWD reserves the right, prior to the finalization of awards, to make adjustments that support fair and equitable access to services. Applicants may be provisionally awarded funds. Providers may also receive technical assistance and professional development to improve program performance and may be required to submit a Corrective Action Plan (CAP).

Final budgets may be negotiated and all subgrants are contingent and may change based on federal and state appropriations.

Other Requirements: Increased collaboration between Indiana Adult Education grant recipients and the local workforce development boards (LWDBs) is encouraged. The grant requires that LWDBs have an opportunity to review all applications submitted to DWD that propose to offer services within the local workforce development area. In Indiana's RFA, entities must describe how the applicant plans to continually align its services with the workforce development regional plans (local plans) must also be included. The applicant organization's relationship with the one-stop partners in the communities where it is applying for funding and how the applicant organization intends to work with one-stop partners to ensure the efficient delivery of adult education and literacy services to eligible individuals must be addressed. This includes plans for co-enrollment, referral services, and infrastructure costs.

Any recipient of funds awarded must provide reasonable accommodations to all qualified individuals (both employees and students) with disabilities unless that accommodation would represent an undue burden in the exercising of the responsibilities of the sub-recipient to deliver adult education and literacy activities. Accepting an award is an acknowledgement that the grant recipient is following the Americans with Disabilities Act. Applicants are also required to acknowledge compliance with the General Education Provisions Act (GEPA).

C. Corrections Education and other Education of Institutionalized Individuals (WIOA section 102(b)(2)(D)(ii)(II)(bb))

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate programs that provide any of the following correctional educational programs identified in section 225 of WIOA:

- *Adult education and literacy activities;*
- *Special education, as determined by the eligible agency;*
- *Secondary school credit;*
- *Integrated education and training;*
- *Career pathways;*
- *Concurrent enrollment;*
- *Peer tutoring; and*

- *Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.*

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

Indiana's process to award funds provided under Programs for Corrections Education and Other Institutionalized Individuals is the same as (b) and is repeated here.

The Indiana Department of Workforce Development (DWD) solicits applications and proposals from entities eligible to receive WIOA Title II funds. Applicants can apply for funding in several areas that include adult education and literacy activities – WIOA Title II (per 29 USC §3272); adult high school credit program/competency-based high school diploma program/adult secondary credit (ASC); corrections education and education for institutionalized individuals; integrated education and training activities (IETs); workforce education initiative (WEI); and/or Indiana online only distance education.

An eligible individual is an individual who is 16 years of age or older; who is not enrolled or required to be enrolled in secondary school under State law; who is basic skills deficient; does not have a secondary school diploma or its recognized equivalent and has not achieved an equivalent level of education; or is an English language learner.

DWD competes funds in accordance with 34 CFR section 463 Subpart C.

To be awarded WIOA Title II funds in Indiana, applicant organizations must be an eligible provider as defined by WIOA (per 29USC §3272). An applicant must be able to demonstrate past effectiveness in providing adult education and literacy activities before the applicant can be considered an eligible applicant. Data which demonstrate the applicant's effectiveness in providing adult education and literacy services include evidence of eligible individuals' academic gains (reading, writing, mathematics, or English language acquisition), employment outcomes, family literacy, attainment of secondary credentials, transitions to postsecondary education, and workforce training.

Application materials include a separate data collection tool to ensure how past effectiveness is determined so that all eligible providers are treated fairly in grant competitions. Applicants that do not have performance data under WIOA section 116 may demonstrate previous effectiveness in servicing basic skills deficient eligible individuals, including evidence of success in achieving the outcomes listed above. In the case of applicants applying as a consortium, each member of a consortium must provide performance data to demonstrate effectiveness. Application materials clearly identify how many years of demonstrated effectiveness data an applicant must submit in the application.

Indiana conducts its review of applicant eligibility to determine if an application is from an eligible provider of demonstrated effectiveness by utilizing a "yes" or "no" determination. The State screens each application to determine if it is from an eligible provider of demonstrated effectiveness and only applications that are determined to be from eligible providers of demonstrated effectiveness are forwarded for review, scoring, and consideration for funding. Similarly, all sub-recipient members must be determined to be an eligible provider of demonstrated effectiveness in order for the consortium application to be forwarded for review, scoring, and consideration for funding.

Applicants that are determined to be ineligible for funding because they were not determined to be eligible providers of demonstrated effectiveness are notified.

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To fund eligible providers, a rubric is utilized to score the narrative section for the thirteen considerations. Review teams utilize a 0–5-point Likert Scale to score the quality of each response. Reviewers provide notes or commentary to justify the score, provide brief details of what the applicant omitted or missed, and brief descriptions of anything "positive" about the application.

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DWD utilizes overall scores, quality of grant submissions, and responses to the thirteen considerations and any State considerations to fund eligible providers. Additionally, the State

reviews funding requests and proposed service delivery areas to ensure that every county in the State is covered.

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Funding is allocated and distributed at the state level as prescribed by Title II, Adult Education and Family Literacy Act (AEFLA):

1. Not less than 82.5 percent of the grant funds are dedicated for awards under section 231 and to carry out section 225, Programs for Corrections Education and Other Institutionalized Individuals, of which not more than 20 percent is available to carryout section 225;

2. Not more than 12.5 percent of the grant funds are applied to carryout state leadership activities under section 223; and

3. Not more than five percent of the grant funds are set aside for administrative expenses of the eligible agency.

In making initial award determinations during the first year of a multi-year grant, DWD will take into consideration each applicant's:

1. Accomplishments and progress toward goals;

2. Capacity and efficiency in service delivery;

3. Gaps and barriers that limit participation; and

4. Employment and labor market demands.

Based on state priorities, funding is prioritized and grants are awarded, in part, to:

1. Organizations that have demonstrated effectiveness in improving the literacy of eligible individuals, especially participants who have low levels of literacy;

2. Organizations with services that are aligned with local workforce strategies, priorities, and partners; and

3. Organizations with services that are responsive to the needs of persons with barriers to employment.

Data is aggregated at the economic development regional level to determine the total amount of funds available for the region. Applicants apply for a region or a portion of the funds available in each region they intend to serve. To award funds, DWD considers the score and rank of proposals in a regional workforce area to allow for a diversity of programs geographically.

Total funding requested may vary depending upon program size, population (anticipated enrollment), demonstrated need, capacity, and number of subgrants within a service area. DWD distributes funding based on this review, attempting to fund as many applicants meeting minimum benchmarks in each area. State statute requires that at least 25 percent of the funding appropriated by the general assembly for adult education and literacy activities be used for workforce programming.

DWD reserves the right to award grant funds in amounts different from the applicant's initial budget request. Adjustments may be based on how the proposed budget and budget narrative covers program expenses and whether the requested amount is proportionate to the number of participants projected or previously served based on previous performance.

For DWD to maintain the federally required Maintenance of Effort (MOE), Indiana requires that WIOA-funded Adult Education providers contribute a local match.

In continuation years, the allocation of funds takes into account past performance as a basis for an increase or decrease in funds. Considerations include enrollment, measurable skills gains, high school equivalency attainment, and the number of industry-recognized credentials attained by students. Providers that achieve all or a percentage of state-defined performance goals may also qualify for additional funding for outstanding performance during a program year.

DWD reserves the right, prior to the finalization of awards, to make adjustments that support fair and equitable access to services. Applicants may be provisionally awarded funds. Providers may also receive technical assistance and professional development to improve program performance and may be required to submit a Corrective Action Plan (CAP).

Final budgets may be negotiated and all subgrants are contingent and may change based on federal and state appropriations.

Further, DWD awards between 1% and twenty 20% percent of the total funds made available through an RFA to be used specifically to provide adult education and literacy activities to eligible individuals currently incarcerated in a State prison or correctional facility, a county jail, or are currently participating in Indiana's community corrections program. DWD requires all programs providing adult education and literacy activities to criminal offenders in State or county custody to give priority to individuals who are likely to leave State or county custody within 5 years of receiving adult education and literacy services.

In the RFA, eligible providers list the location(s) where adult education activities including adult education, literacy, secondary school credit, English language acquisition, workforce preparation and IET to eligible individuals who are currently inmates in State prisons, county jails, or are part of Indiana's community corrections programs are planned. A description of how the applicant plans to identify and provide services for eligible individuals with accommodated educational needs (disabilities and/or learning disabilities) in the corrections environment must be specified. Additionally, the applicant's capacity to deliver adult education and literacy activities must be

addressed, as well as how the applicant plans to offer or partner with others to offer transitional services to eligible individuals exiting custody.

Other Requirements: Increased collaboration between Indiana Adult Education grant recipients and the local workforce development boards (LWDBs) is encouraged. The grant requires that LWDBs have an opportunity to review all applications submitted to DWD that propose to offer services within the local workforce development area. In Indiana's RFA, entities must describe how the applicant plans to continually align its services with the workforce development regional plans (local plans) must also be included. The applicant organization's relationship with the one-stop partners in the communities where it is applying for funding and how the applicant organization intends to work with one-stop partners to ensure the efficient delivery of adult education and literacy services to eligible individuals must be addressed. This includes plans for co-enrollment, referral services, and infrastructure costs.

Any recipient of funds awarded must provide reasonable accommodations to all qualified individuals (both employees and students) with disabilities unless that accommodation would represent an undue burden in the exercising of the responsibilities of the sub-recipient to deliver adult education and literacy activities. Accepting an award is an acknowledgement that the grant recipient is following the Americans with Disabilities Act. Applicants are also required to acknowledge compliance with the General Education Provisions Act (GEPA).

D. Integrated English Literacy and Civics Education Program (WIOA section 102(b)(2)(D)(ii)(II)(cc))

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA. Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be offered in combination with integrated education and training activities found in 34 CFR section 463.36.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for,

and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

Indiana's process to award funds provided under Integrated English Literacy and Civics Education Program is the same as (b) and (c) and is repeated here.

The Indiana Department of Workforce Development (DWD) solicits applications and proposals from entities eligible to receive WIOA Title II funds. Applicants can apply for funding in several areas that include adult education and literacy activities – WIOA Title II (per 29 USC §3272); adult high school credit program/competency-based high school diploma program/adult secondary credit (ASC); corrections education and education for institutionalized individuals; integrated education and training activities (IETs); workforce education initiative (WEI); and/or Indiana online only distance education.

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DWD competes funds in accordance with 34 CFR section 463 Subpart C.

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DWD reserves the right, prior to the finalization of awards, to make adjustments that support fair and equitable access to services. Applicants may be provisionally awarded funds. Providers may also receive technical assistance and professional development to improve program performance and may be required to submit a Corrective Action Plan (CAP).

Final budgets may be negotiated and all subgrants are contingent and may change based on federal and state appropriations.

In Indiana, WIOA Title II [§203(12)] authorizes the funding of programs providing adult education and literacy activities to English Learners (ELs), including professionals with degrees and credentials in their native countries, that enable adults to achieve competency in the English language and acquire both the basic and more advanced skills necessary to function effectively as parents, workers, and citizens of the United States. These services include: 1) academic instruction in literacy and English language acquisition – reading, writing, speaking, and comprehending; 2) instruction on the rights and responsibilities of U.S. citizenship and civic participation; and 3) workforce training.

To receive funding for Integrated English Literacy and Civics Education (IELCE) under WIOA [§243] in Indiana, a program must: 1) prepare adults who are ELs for unsubsidized employment in high-demand occupations or career pathways, which lead to economic self-sufficiency; 2) assist ELs in achieving competency in English reading, writing, speaking, and comprehension; 3) lead to a secondary school diploma (high school diploma or HSD) or its equivalent (HSE or high school equivalency); 4) lead to ELs entering postsecondary education or training; and 5) offer adult education instruction in combination with IET.

IETs for IELCE students are intentionally short-term, a minimum of 40 hours, and a maximum of 14 weeks. The certification must be industry-recognized and high-demand occupations prior to approval. These basic requirements provide adults opportunities that lead to economic self-sufficiency. Immigrants often experience issues with verification of foreign credentials and licenses. IELCE activities may include foreign credential verification along with additional resources within a larger network.

The RFA requires potential providers to 1) explain how the applicant organization plans to provide contextualized instruction to eligible individuals; 2) how CCR standards will be used to enhance instruction and align with WIOA; 3) how career readiness and workforce skills will be taught to eligible individuals; 4) how the organization intends to offer contextualized instruction; and 5) how the organization will implement career awareness curriculum.

Applicants are required to address in the RFA 1) the specific occupation or occupational sector that the proposed IET will cover; 2) the funding that will be used for the training portion of the proposed integrated education and training; 3) the intensity and quality of the adult education and literacy activities component of the organization's proposed integrated education and training class(es); 3) the occupationally relevant materials that will be used; and 4) the specific workforce preparation activities that will be included in the proposed IET and how these activities will be provided.

Additionally, the RFA requires applicants to describe how the three required components of IETs will occur simultaneously with academic instruction in literacy and English language acquisition and instruction on the rights and responsibilities of US citizenship and civic participation.

How is Indiana including instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation into IELCE?

Indiana includes instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation through a variety of resources within IELCE programs.

Unlike national trends in adult education, the largest number of English language learners (ELL) in Indiana enrolled at literacy or pre-literacy levels. To gain more insight, DWD and local providers collaborated with a non-profit community organization, Immigrant Welcome Center of Indianapolis. A report entitled, Adult English Language Learner Pathway to Literacy Program, January to May 2023, and released by the Immigrant Welcome Center summarized that "organizations and educators have collaborated on curriculum development, assessment, classroom teaching, teacher support, and student referral systems to create a cohesive program aimed at getting adult ELL emergent readers to the starting line of the mainstream Level 1 Adult Basic Education English to Speakers of Other Languages (ESOL) classes."

To measure skill gains, the Pathway to Literacy Program administered an alternative assessment piloted for the project that showed promising results. The Immigrant Welcome Center hosted study

circles with ELL teachers and training included topics of phonological awareness, phonics, and vocabulary for learners with little or formal education in their native countries.

Teachers used a variety of resources and technology to provide instruction on the rights and responsibilities of citizenship and civic participation for the IELCE program. Because no one program or curriculum was recommended over another, teachers had flexibility to select resources that best met students' needs. Many providers with larger populations of non-native English speakers employed ELL professional development facilitators (PDF), lead teachers, to coordinate professional development at the local level. Because of low literacy levels, some providers offered IECLE as a bridge to better prepare students as they increased language skills.

An immigrant and refugee legal services map was created to help providers access assistance for students in cities across the state. An analysis was completed, and information presented on countries and languages spoken and the growing influx of Internationally Trained Professionals was highlighted. Local providers utilized vendors like BurlingtonEnglish that "blended curriculum to promote academic preparation, civics knowledge, career readiness, and technology integration at all levels and areas of instruction." Further, BurlingtonEnglish integrated "EL Civics content into the curriculum to help students improve language proficiency and gain important life skills," including U.S. citizenship, housing, and healthcare.

Meanwhile, DWD connected with the U.S. Citizenship and Immigration Services to provide information on additional grants that would prepare immigrants for naturalization and promote civic integration through increased knowledge of English, U.S. history, and civics. Educational products for adult educators were available on the U.S. Citizenship and Immigration Services' website for inclusion in class lessons. Providers used local resources, such as attorneys, to provide additional information to guide new immigrants through the process of applying for citizenship. IELCE activities included but was not limited to helping ELL students increase their economic well-being by offering numeracy and financial literacy skills required for online banking, bill paying, tax filing, and other activities required for civic and workforce participation.

How is Indiana designing IELCE to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency?

To meet workforce needs, Indiana designed IELCE programming to prepare adults who are English language learners for, and placement of adults in, unsubsidized employment for in-demand industries and occupations that lead to economic self-sufficiency. Workforce training was offered; however, any IELCE eligible individual could opt out of the training component of an IELCE program if he or she was not ready.

Required for students in ELL levels 4-6, Indiana Career Explorer was a tool to align interests and skills with high-demand career pathways by connecting individuals with resources and a plan how to get there. Indiana Career Explorer included identifying jobs that were expected to be in high demand, potentially leading to greater job prospects. Each potential job description provided

insight into the profession including education, training, or certifications needed and where to go for that knowledge.

Meanwhile, individual classes and vendors like BurlingtonEnglish provided digital skills courses for success in today's workforce with contextualized language, communication, and employability skills needed to help ELL students attain, succeed in, or transition to a new career. Beginning in PY 2024, all IELCE-funded providers will be required to employ at least one ELL career navigator within the program. ELL career navigators will play an important role in serving English learners and immigrants who benefit from additional aid navigating complex U.S. systems, particularly in the workforce.

Career navigators will identify ELL students who are actively looking for employment or additional training/education opportunities as they enroll in programs. They will serve as program liaison for Internationally Trained Professionals and be responsible for collecting previous work experience, certifications or education by sector, and career goals. Additionally, career navigators will develop a network of partner organizations that can refer students to adult education and extend services beyond.

Potential partners include refugee resettlement organizations; local faith-based and community organizations; post-secondary institutions; WorkOne and Title I & II offices; local schools with significant ELL populations; legal aid organizations; and employers that currently hire or are interested in hiring ELL. Moreover, they will identify program and individual barriers to ELL persistence and completion and collaborate with other adult education workforce personnel to develop and promote short-term career certifications aligned to student experience, interest, and community career opportunities.

Career navigators, as well as instructional staff, will provide guidance on unsubsidized employment for in-demand industries and occupations that lead to economic self-sufficiency and include topics such as: getting and retaining a job; transferrable skills, certification, and licensing requirements; online application forms; job interviews and career fairs; workforce readiness and soft skills; onboarding, teamwork, conflict resolution, and problem-solving; and workplace safety skills.

Other Requirements: Increased collaboration between Indiana Adult Education grant recipients and the local workforce development boards (LWDBs) is encouraged. The grant requires that LWDBs have an opportunity to review all applications submitted to DWD that propose to offer services within the local workforce development area. In Indiana's RFA, entities must describe how the applicant plans to continually align its services with the workforce development regional plans (local plans) must also be included. The applicant organization's relationship with the one-stop partners in the communities where it is applying for funding and how the applicant organization intends to work with one-stop partners to ensure the efficient delivery of adult education and literacy services to eligible individuals must be addressed. This includes plans for co-enrollment, referral services, and infrastructure costs.

Any recipient of funds awarded must provide reasonable accommodations to all qualified individuals (both employees and students) with disabilities unless that accommodation would represent an undue burden in the exercising of the responsibilities of the sub-recipient to deliver adult education and literacy activities. Accepting an award is an acknowledgement that the grant recipient is following the Americans with Disabilities Act. Applicants are also required to acknowledge compliance with the General Education Provisions Act (GEPA).

E. State Leadership (WIOA section 102 (b)(2)(D)(ii)(III))

Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA.

Alignment

In Indiana, there is robust alignment of adult education and literacy activities with other core programs and one-stop partners. Through State and local collaborations between adult education, vocational rehabilitation, family and social services, workforce employment providers, and other partners, Hoosiers participate in a sequential series of services that result in a seamless transition to employment and/or enrollment in postsecondary education or training. While clients enter through multiple doors, the objective is the same – a seamless referral system. In addition to traditional classes within school facilities, classes for eligible adult participants take place at workforce offices, community centers, houses of worship, employers, and postsecondary institutions.

Referral procedures and data sharing are in place among cross agencies. Curricula are aligned with the College and Career Readiness Standards to reflect the content most relevant to preparing adult students for success in colleges, technical training programs, work, and citizenship—in the areas of English language arts/literacy and mathematics. Assessment and other professional development opportunities are shared between core partners. The workforce system provides assessment services and provides results to adult education partners and other agencies. Adult education staff convene regional consortia to discuss and share promising practices and barriers to participant success.

Indiana Career Explorer is provided across systems to assist participants with the exploration of career possibilities, to help them make decisions about their future, and prepare for the next step in their education and career planning journey. Indiana Career Explorer is a comprehensive starting point for determining career interests and abilities and is a required part of orientation for all adult education participants.

High Quality Professional Development

Indiana Adult Education has established a solid foundation for the delivery and operation of a high-quality professional development program to facilitate and improve instruction.

Professional Development Facilitators (PDFs) are an anchor for State leadership activities. They are a network of lead adult education instructors who are trained to model and deliver the highest quality professional development both locally and regionally. Professional development delivered by PDFs are tied directly to State and federal adult education performance measures. PDFs develop local and regional professional development plans and share their knowledge and expertise to assist adult education programs and DWD with continuous adult education program improvement.

In addition to modeling effective teaching strategies, PDF responsibilities include development of local professional development plans in conjunction with program directors and DWD representatives; creation of new teacher trainings and orientations; delivery of assessment and accommodations trainings; and one-on-one assistance to instructors as required by DWD or requested by local program directors. A virtual teacher training to help on-board new adult education teachers was developed and implemented in 2024. This training has been used by 46 teachers to ensure training for standards-based instruction is available for the field.

Supplemental professional development is offered based on a needs assessment. Sessions are reviewed by participants and evaluated by the professional development team. Local providers must incorporate lessons learned into local programming, performance targets, and provide feedback through written reports. Past examples included face-to-face trainings and virtual offerings on topics such as Evidence-Based Reading; Integrated Education and Training | Workforce Education Initiative Training; and Promising Strategies for the Implementation of Distance Education and Remote Instruction.

The Indiana Mentoring Project, in collaboration with DWD and the State adult education professional association, provides opportunities for administrators of adult education, especially new or nearly new, to connect with a retired director of adult education. The project offers technical assistance, professional development, promising practices, and on-demand, individualized coaching to cultivate and support new leaders for continued success. Mirroring the new teacher training, the Indiana Mentoring Project developed a new administrator training that can be accessed via a virtual platform. This training provides instruction on basic concepts including federal WIOA legislation, the National Reporting System framework, an overview of Indiana approved assessments, Integrated Education and Training, and Indiana's Workforce Education Initiative. To date, over 20 adult education directors and lead staff have completed the training.

The State adult education office sponsors conferences in partnership with its professional organization. The event is a shared educational/professional development opportunity for adult educators, directors, administration, and support staff, WorkOne staff, career and transition counselors, and other adult education stakeholders. The conference allows sharing of promising practices and presents opportunities to model effective strategies, including technology and resources, for adult educators. In a typical year, approximately 325 Indiana adult education staff, state team staff, and workforce partners attend this conference.

Sessions are evaluated by participants and results are shared with DWD's professional development team as a guide in planning additional opportunities and technical assistance throughout the program year. DWD's professional development team reviews the conference's agenda and solicits session presenters based on this coordinated effort.

Topics are chosen, in part, based on the State's professional development initiatives and how Indiana can strengthen and build upon its adult education delivery system based on negotiated performance targets.

Disseminates Promising Practices

DWD's adult education professional development initiative provides technical assistance; develops and disseminates instructional and programmatic practices based on scientifically valid research; promotes access to employment, education, and training services; and offers assistance in the use of technology. Teachers and instructional aides working nine (9) or more hours per week in adult education are required to complete a minimum of one (1) DWD adult education sponsored professional development initiative annually. Each DWD professional development initiative must be a minimum of 10 hours in length, will be extended over time, and will be either job embedded or require participation in a community of practice. In partnership with the State's professional organization, many COABE and LINCs trainings are made available to meet this requirement.

Each local professional development plan is approved individually by the professional development team and encompasses goals based on scientifically valid research that will contribute to meeting specific performance metrics. DWD's Workforce Education Initiative (WEI) pairs adult education, the workforce system, and businesses with employees who require basic skills upgrading to be successful on the job. An adult education coordinator serves as a workforce resource. Meanwhile, Integrated Education Training (IET) programs are approved individually at the State level, must be 40 hours in length and no more than 14 weeks in length, and lead to an industry-recognized credential. Curricula are evaluated and technical assistance is provided when required by the State adult education office.

Monitoring Quality and Improvement

The State adult education team continually monitors and evaluates adult education programming throughout the State. Monthly reports are sent to programs outlining performance compared to the same time a year ago and to State averages. Performance metrics are shared and evaluated with PDFs to implement strategies to improve the delivery of instruction and services to participants and core partners. Monthly statewide webinars take place and include performance goals, and initiatives to meet benchmarks. Three State adult education team members serve as the State's monitoring team. Risk assessments are conducted, and programs are chosen for yearly monitoring visits. Reports are written and distributed, and technical assistance, including individualized professional development, is provided to correct deficiencies.

Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable.

In addition to regional support managers and State staff who provide technical assistance, Professional Development Facilitators (PDFs) provide "boots on the ground" to monitor and evaluate State and local initiatives that will foster improvement in teaching and learning. State goals are outlined each year and local professional development plans are created based on State initiatives and local goals. PDFs determine where needs exist and develop yearly plans to advance services, build communities of practice, monitor, and evaluate performance targets, and institute promising practices based on sound research.

The Workforce Education Initiative (WEI) brings adult education, businesses, and employees together to skill up workers who lack basic skills and require additional training for improved performance on the job and career advancement. The State adult education office provides a dedicated position to provide this linkage. Each workforce project submitted must be approved by the State coordinator, who provides technical assistance, promotes promising practices, and monitors and evaluates performance.

Additionally, Indiana Adult Education requires that each funded provider employ an academic and career counselor. This position is a bridge between students, program staff, employers, workforce, higher education, and other core partners to lessen barriers to participation. The State adult education office provides a dedicated position to provide this coordination.

F. Assessing Quality (WIOA section 102(b)(2)(D)(ii)(V))

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II.

Describe how the eligible agency will take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

Describe how the eligible agency will use evaluations, data analysis, program monitoring, or other methods to improve the quality of adult education activities in the State.

The State office to provides technical assistance and State adult education staff provide targeted professional development in assigned regions. In addition to visiting classes, the team reviews goals, conducts monthly monitoring, and provides analysis and interpretation of performance data. Each program provides comparisons to how the provider is performing regionally and to State averages. Every program employs or has access to a Professional Development Facilitator (PDF), a lead teacher who works with instructional staff and leadership on program improvement and student success.

Indiana State leadership introduced the 'Programs of Excellence' framework in 2023 to serve as a guide for state goals and expectations. At the beginning of each program year, five-six performance benchmarks are introduced. The performance benchmarks align to federal goals and state priorities and clearly communicate state expectations for program success. In the first quarter of

the year, programs are recognized based on whether they me the goals introduced at the beginning of the prior year. To date, approximately 30-35% of programs have achieved this designation across three years. The State office has also created an outreach toolkit to help programs promote this achievement with their internal and external stakeholders. This recognition is often promoted in local media, board meetings, and with legislative representatives and increases the awareness of the exceptional services being provided by Indiana Adult Education. The 'Programs of Excellence' is a positive approach to ensuring programs are aware of expectations as part of a broader accountability-focused culture.

The Indiana Mentoring Project, in collaboration with DWD and the State adult education professional association, provides opportunities for administrators of adult education, especially new or nearly new, to connect with a retired director of adult education. New administrators are usually more open to asking questions with a mentor as they evaluate problems, consider solutions, and utilize data for continuous improvement. A mentor can individually address specific issues and provide guidance, encouragement, and support.

Three adult education staff serve as part of the State's monitoring team. The data team alerts State staff when questions arise or if there are irregularities in data submissions. The monitoring team utilizes a formal monitoring instrument to review and evaluate providers. Programs are chosen for monitoring based on risk assessment. An exit interview is conducted at the conclusion of the visit with leadership, and a formal report is written and submitted to the provider. A corrective action plan may be necessary and is coordinated through the regional adult education coordinator. Additional technical assistance and localized professional development are often required to correct deficiencies.

The State office employs a workforce coordinator and a professional development lead. The Workforce Education Initiative (WEI) targets employers with workers who possess basic skill deficiencies and desire to maintain their jobs or improve performance. Additionally, this project supports employers in hiring and retaining workers who will be able to meet demands for productivity, safety, and advancement. The State coordinator reviews and assesses the quality of each workforce application and proposal and provides recommendations for improvement before the State approves the project.

Targeted professional development trainings, including the joint annual conference developed by the professional development team and the professional organization, are evaluated individually by participants. Results are shared and analyzed to improve and build on future events and activities.

Adult Education and Family Literacy Act Program Certifications

	States must provide written and signed certifications that:	
1.	The plan is submitted by the State agency that is eligible to submit the plan;	Yes
2.	The State agency has authority under State law to perform the functions of the State under the program;	Yes
3.	The State legally may carry out each provision of the plan;	Yes
4.	All provisions of the plan are consistent with State law;	Yes
5.	A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;	Yes
6.	The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;	Yes
7.	The agency that is submitting the plan has adopted or otherwise formally approved the plan; and	Yes
8.	The plan is the basis for State operation and administration of the program;	Yes

Adult Education and Family Literacy Act Program Assurances

	The State Plan must include assurances that:	
1.	The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes
2.	The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes
3.	The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services, or activities related to family literacy activities, as defined in section 203(9) of WIOA;	Yes
4.	Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5.	The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes

Authorizing or Certifying Representative

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, ''Disclosure of Lobbying Activities,'' in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, ''Disclosure of Lobbying Activities,'' in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Please download and sign the forms below. Please scan and return the forms to wioa@ed.gov at the same time you submit your State Plan via the portal.

1. *SF424B - Assurances – Non-Construction Programs*
   (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)

2. *Grants.gov - Certification Regarding Lobbying*
   (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)

3. *SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable)*
   (http://www2.ed.gov/fund/grant/apply/appforms/appforms.html)

APPLICANT'S ORGANIZATION	Enter information in this column
Applicant's Organization	Indiana Department of Workforce Development
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	**Enter information in this column**
First Name	Mike
Last Name	Smith
Title	Interim Commissioner
Email	mismith4@dwd.in.gov

Section 427 of the General Education Provisions Act (GEPA)

EQUITY FOR STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) *([20 U.S.C. 1228a](#)) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.*

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

• Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.

• Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.

• Applicants are not required to have mission statements or policies that align with equity to apply.

• Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.

• Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

GEPA Section 427 Instructions to State Applicants for their Subrecipient Applicants

The State grantee provides a subrecipient applicant seeking Federal assistance instructions and guidance for how it must comply with the GEPA Section 427 requirement. The State grantee determines the form and content of the information a subrecipient applicant must include in its application regarding the steps it proposes to take to ensure equitable access to, and equitable participation in, its local-level project or activity. For example:

• The State grantee may require its subrecipient applicant to use and submit the GEPA Section 427 form that it is required to submit to the Department; or

• The State grantee may use a State-developed form that is sufficient to meet the GEPA Section 427 requirement.

• The State grantee maintains the subrecipient applicants' responses in the State office.

Please refer to GEPA 427 - Form Instructions for AEFLA Application Package

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.*

 GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

All applicants and grantees are required to attach a description of the steps the organization proposes to take to ensure equitable access to, and participation in, its federally assisted program. Failure to address the GEPA consideration results in the non-consideration of the submitted application.

Programs address the special needs of students, teachers, and other program beneficiaries to overcome barriers to programming and participation, including those based on gender, race, color, national origin, disability, and age. Through monitoring, the State office ensures that local providers give equal access to, and equitable participation in, all such projects.

Additionally, all WIOA Section 223 State Leaderships funds utilized for professional development will include steps to ensure equitable access to, and participation in, the federal grant program by local adult education personnel, including administrators, teachers, aides, academic and career coaches, and other staff who participate.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.*

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

The State adult education office identifies improvement strategies and the need for targeted professional development offerings among instructional staff at the local level. Indiana utilizes State Leadership funds to formulate a local network of teachers to determine effective strategies for engaging them in improvement efforts. This activity continues to address barriers to equitable participation for students based on academic achievement to satisfy the GEPA requirement.

As a State office, the goal in Indiana is to prevent the elimination or underutilization in the workforce of members of any group on the basis of race or color, religion, nationality, age, gender, or disability. Each State employee has the right to work in a professional atmosphere which promotes equal opportunities regardless of race, sex, religion, age, nationality, sexual orientation, gender identity or disability. The State does not tolerate, condone, or allow any harassment or discrimination whether verbal, physical or environmental.

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

Section 427 of the General Education Provisions Act (GEPA) ([20 U.S.C. 1228a](#)) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

[GEPA 427 - Form Instructions for AEFLA Application Package](#)

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

The State engages in an interactive process to identify reasonable accommodations wherever necessary for all employees or applicants with a known disability. Reasonable accommodations include, but is not limited to:

- Making existing facilities readily accessible and usable;

- Restructuring of a job or service, or of the way in which aid, benefits, services, or training is/are provided;

- Modified work schedules or training schedules;

- Acquisition or modification of equipment or devices;

- Appropriate adjustment or modifications of examinations, training materials, or policies; and

- Provision for readers or interpreters.

The State adult education office also ensures equitable access to, and participation in, all staff projects and activities conducted with federal and State adult education funds.

The State Adult Education leadership team has entered into a partnership with the Indiana University School of Education to conduct original research on how to better support adults entering the system at the lower levels of reading. The purpose of the project is to identify the perspectives of learners, teachers, and program administrators from across Indiana about their experiences teaching and learning reading with ABE and EL learners who have low reading assessment scores (EFL 1 and 2). The research is being funded through the Jack Crabtree Research Grant and is being supported through the American Association of Adult and Continuing Education.

It will be used to develop trainings to better equip Adult Education teachers in delivering instruction to low-literacy students.

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.*

 GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

Based on these needs, Indiana will continually utilize State Leadership funds to identify and provide a myriad of professional development opportunities, in part, for teachers and program staff to provide additional opportunities to assist learners with multiple barriers to satisfy the GEPA requirement.

Vocational Rehabilitation

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A. State Rehabilitation Council

All VR agencies, except for those that have an independent consumer-controlled commission, must have a State Rehabilitation Council (Council or SRC) that meets the criteria in Section 105 of the Rehabilitation Act. The designated State agency or designated State unit, as applicable, has (Select A or B):

☐ *(A) is an independent State commission*

☒ *(B) has established a State Rehabilitation Council.*

In accordance with Assurance 3(b), please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative's term.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	1	01/2026
Parent Training and Information Center	Vacant/nominee pending	
Client Assistance Program	1	01/2024
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	vacant/nominee pending	
Community Rehabilitation Program Service Provider	Vacant/nominee pending	
Business, Industry, and Labor	2	01/2022
Business, Industry, and Labor	2	01/2024
Business, Industry, and Labor	2	01/2022
Business, Industry, and Labor	Vacant/nominee pending	

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Disability Advocacy Groups (2 representatives)	1 Vacant/nominee pending	01/2024
Current or Former Applicants for, or Recipients of, VR services (representatives)	1 1 1 1	01/2024 01/2024 01/2024 01/2024
Section 121 Project Directors in the State (as applicable)	N/A	N/A
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	1	01/2024
State Workforce Development Board	Vacant	
VR Agency Director (Ex Officio)	N/A	07/2016
Disability Advocacy Group (third representative)	1	01/2024

If the SRC is not meeting the composition requirements in Section 105(B) of the Rehabilitation Act and/or is not meeting quarterly as required in Section 105(f) of the Rehabilitation Act, provide the steps that the VR agency is taking to ensure it meets those requirements.

All seats are currently filled with Governor appointed members, or a nominee has been submitted for consideration for appointment with the Governor's office with the exception of a representative from the state workforce development board as the membership for the board was pending at the time of the State plan public comment period. Once the State Workforce Development Board membership is appointed, a candidate for the VR Council will be identified. BRS and the VR Council membership committee continue to actively seek qualified individuals to fill any anticipated upcoming vacancies and make recommendations to the Governor's office for appointment as necessary.

In addition to the federally required members listed in the table above, Indiana's Employment First Act expands VR Council membership to include the following additional representatives:

Trade Association of I/DD Service Providers (state requirement)	vacant; pending nominee	
State Division of Mental Health and Addiction (Ex Officio- state requirement)	2	January, 2023
State Developmental Disability Services (Ex Officio- state requirement)	1	January, 2024

In accordance with the requirements in Section 101(a)(21)(A)(ii)(III) of the Rehabilitation Act, include a summary of the Council's input (including how it was obtained) into the State Plan and any State Plan revisions, including recommendations from the Council's annual reports, the review and analysis of consumer satisfaction and other Council reports.

The VR Council meets five times each year, with meetings occurring approximately every other month, regularly receiving updates from BRS leadership and providing feedback on many VR program initiatives. The VR Council reviewed and discussed the draft state plan on September 8th, 2023 during a council meeting. Commission members were supportive of the goals and strategies outlined for the Performance Year (PY) 24-25 VR section of the State Plan. The Council stated that the goals and strategies seemed very comprehensive and aligned with current initiatives as well as identified areas of improvement. The VR Council made some recommendations for further enhancement of the goals. Recommendations are included in the next section.

The Council also reviewed highlights of performance on prior year state plan goals, order of selection data including a need to continue the order selection partway through PY24, annual estimates, and federal performance indicators including actual performance from prior years as well as estimated performance targets. The Council revisited section A during a public council meeting on March 14, 2025. BRS remained under an order of selection at the time the state plan was submitted in Spring, 2024, however all waitlists were opened in October of 2024. The Council voiced positive support to the reopening of all waiting lists and the end to the order of selection during several meetings, including the March 14, 2025 meeting where they acknowledged the administrative updates to the state plan to reflect the end to OOS.

Customer satisfaction survey results are presented to the VR Council at least twice per year, and council members have opportunity to ask questions and share feedback or suggestions. In July 2023, BRS proposed a modification to the survey process to shift to electronic survey collection and the commission was in support of this, along with the continued availability of alternative options for customers to complete the survey such as working individually with a BRS central office

team member to complete the survey verbally or completing a paper survey with a self-addressed stamped return envelope.

PY26-27 State Plan Amendment: The VR Council followed a similar process for review and discussion of the State Plan update, as occurred during the development of the initial state plan submission two years ago. The council reviewed updates to the State Plan, including draft revisions to goals, priorities and strategies; annual estimates; as well as council input from the original State Plan submission. This review along with council discussion occurred during the Council's November 14, 2025 public meeting.

Provide the VR agency's response to the Council's input and recommendations, including an explanation for the rejection of any input and recommendations.

Input: The VR Council acknowledged that goals, priorities and strategies were aligned with topics and areas of growth discussed during commission meetings and from review of VR performance data. No missing areas of focused were identified, however there were a few recommendations as outlined below that pertain to the original state plan submission. The VR Council acknowledged the positive trend in performance on federal performance indicators and agreed that areas of continued growth include continued increase in median wages and in the number of individuals enrolled in programs that result in post-secondary credentials. The council noted that these two areas are interrelated. The VR Council complimented VR in particular on the postsecondary credential attainment rate, which is above the average in Indiana for all populations enrolled in training at postsecondary institutions. The VR Council remains supportive of progress toward ending the order of selection and reviewed the timeline around this during several meetings in calendar year 2023, including during the September 8, 2023 meeting as part of the review of the draft state plan. As mentioned in section A.4., the Council revisited section A during a public council meeting on March 14, 2025. BRS remained under an order of selection at the time the state plan was submitted in Spring, 2024, however all waitlists were opened in October of 2024. The Council voiced positive support to the reopening of all waiting lists and the end to the order of selection during several meetings, including the March 14, 2025 meeting where they acknowledged the administrative updates to the state plan to reflect the end to OOS.

The following recommendations and BRS responses pertain to the original state plan submission submitted in Spring 2024:

Recommendation: During discussion on the priorities and strategies pertaining to an increased focus on work-based learning, a recommendation was made for BRS to consider reviewing programs offered across other organizations, particularly in regards to messaging to businesses. The Employment Aid Readiness Network (EARN) was one example suggested.

BRS Response: BRS will review programs such as EARN, Indiana's work study program, to learn how those programs are messaged to businesses. Applicable information learned will be

incorporated into VR work based learning service processes, however does not result in any changes to the state plan.

Recommendation: Consider expanding the measurement around increasing applicants to VR who are students, by establishing a goal for the percentage of students with disabilities in secondary education (students receiving special education services through an Individualized Education Plan or served through a 504 plan) who apply for VR or pre-employment transition services (pre-ETS).

BRS Response: Based on this recommendation, BRS reviewed data shared by the Indiana Department of Education (IDOE) to determine a baseline for percentage of students with disabilities who enter VR or pre-ETS and established a goal that supports the increase of students entering into services. A measurement was added to the goals section of the state plan.

Recommendation: Consider collaborating with other organizations, such as the Governor's Council for People with Disabilities, in hosting educational events during Disability Employment Awareness Month.

BRS Response: BRS would be happy to collaborate with the GCPD or other organizations to identify opportunities to partner on initiatives, including during Disability Employment Awareness month.

PY26-27 State Plan Amendment: Commission members viewed the updates to goals, priorities and strategies favorably and commented on the notable theme throughout the updated goals section around intentional service delivery and focus on outcomes. Each revision was reviewed in detail with opportunity for discussion. Discussion included opportunities to leverage technology for gained efficiencies and streamlining, goal alignment with current VR initiatives and priorities, recognition of goal alignment with customer satisfaction survey feedback to reduce length of time between application and service delivery, and opportunities to broaden strategies to keep pace with evolving program and participant needs. The commission was in support of all draft revisions as reflected in Section C of the VR portion of this State Plan. There were no recommended changes to the updated draft state plan.

B. Comprehensive Statewide Needs Assessment (CSNA)

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

1. *The VR Services of individuals with disabilities residing within the State, including:*
   a. *Individuals with the most significant disabilities and their need for supported employment;*

The most recent CSNA was completed in August 2025. The full Comprehensive Statewide Needs Assessment can be viewed on the VR website. The Indiana Bureau of Rehabilitation Services (BRS), which houses IN VR, contracted with PCG-Indiana (PCG) to assist with the completion of the

CSNA. PCG used multiple data sources to develop the analysis and recommendations within this report including the following:

- Secondary data sources, including the American Community Survey (ACS) 1- and 5-year estimates, previously completed IN VR plans and documents, Bureau of Labor Statistics (BLS) projections and estimates, Indiana Department of Workforce Development website, and other materials cited throughout this document
- Surveys with program participants, IN VR staff, community rehabilitation partners (CRP), employers, and individuals with disabilities who were non-program participants
- Key informant interviews and focus groups
- Case management data provided by IN VR

Individuals with most significant disabilities (MSD) represent a super-majority of individuals served by IN VR. They comprise almost four-in-five (78.8 percent) of all active cases within the past three years according to IN VR case management data. This is, in part, driven by Order of Selection [in place August 2017 – October 2024] combined with IN VR's relatively high penetration of population served, representing about 75.5 percent of the potential, of-age service population. This suggests that IN VR services are well-suited toward individuals with MSD.

Significance of Disability	Count of VR participants (n)	Percent of VR participants (%)
Most Significant Disability	25,592	78.8%
Significant Disability	5,442	16.7%
Non-Severe Disability	1,457	4.5%

Similarly, in qualitative and survey feedback IN VR staff and providers were unlikely to specifically mention individuals with MSD generally as an underserved group. In survey responses, only 10.4 percent of responding staff identified individuals with MSD as an underserved group. Staff and providers were both considerably more likely to identify individuals with specific forms of disability as underserved, such as those with mental health conditions or those experiencing circumstances like homelessness or members of racial minority groups. Likewise, IN VR staff did not mention supported employment needs as an underutilized or unavailable service category.

Considering their prevalence in the population, most IN VR participant survey results represent the views of those with MSD. The participant survey showed high levels of service satisfaction. In open-ended survey responses, fewer than one-in-three participant survey respondents (31.3 percent) reported services that they required but did not receive, including supported employment services. Instead, open-ended comments touched upon waiting times for services, and unmet technology or adaptive equipment needs. However, focus groups participants tended to be most positive about technology and adaptive equipment they had worked with IN VR to access.

This may be because those who are MSD have the most positive employment outcomes of any significance of disability category, with about 32.2 percent closing successfully with employment. However, these individuals are less likely to close with wages or hours that support independence,

as their average hourly wage is $13.06 and they work an average of 23.9 hours per week. This MSD average hourly wage and hours are both lower than other service priority categories.

Participants with the most significant disabilities moved through the program at an average rate of 875.0 days from eligibility to closed successful.

Significance of Disability	Average Days Closed Successful (n)	Average Days Closed Other (n)	Combined Average (n)
Most Significant Disability	1,076.3	793.9	875.0

Intellectual and developmental disability as a primary disability accounts for 36.3 percent of participant diagnoses followed by mental health disabilities at 29.5 percent. Mental health-related disabilities are the most common category of both primary and secondary disability currently served by IN VR. This aligns with IN VR staff's view of the population served (see and their needs as presented in the **Error! Reference source not found.** section.

Disability Category	Primary Disability Percent	Secondary Disability Percent
Intellectual and Developmental Disability	36.3%	28.0%
Behavioral/Mental Health Disability	29.5%	46.3%
Physical Disability	20.7%	21.5%
Sensory Disability	13.6%	4.3%

Surveys and focus groups conducted with internal and external stakeholders resulted in several common themes. Key highlights from staff, stakeholder, and participant survey analysis and focus group feedback are included below.

Participant Feedback:

To better understand participant experiences with Indiana Vocational Rehabilitation (VR) services, Self-Advocates of Indiana (SAI) conducted six focus groups as part of the Comprehensive Statewide Needs Assessment. Each focus group was facilitated by an individual with an intellectual or developmental disability and aimed to gather firsthand feedback on service effectiveness, challenges, and opportunities for improvement. Findings from the focus groups indicate that while Indiana VR provides critical services, challenges such as staff turnover, communication issues, and accessibility barriers exist. Participants offered concrete recommendations to address these issues, emphasizing the need for better training, continuity of care, and more proactive VR counselor engagement. Implementing these changes could improve participant experiences and VR service effectiveness.

The following highlights are major takeaways when analyzing data on primary data findings from participants.

- 48.1 percent of participant respondents reported that they 'strongly disagreed' or 'disagreed' that they could use public transportation to get to IN VR services.
- Almost all (84.9 percent) of participants agreed they helped develop their own individualized plan for employment.
- About two-thirds (66.8 percent) of participants disagreed that services were provided quickly enough after they applied.
- Transportation (33.3 percent) and medical care (14.6 percent) were identified as the most frequent basic needs per participant respondents.
- Loss of financial benefits (20.6 percent) and educational or training funding (19.2 percent) were reported by participant respondents as the most frequent financial needs that affected their ability to find or keep a job or advance their career.
- Employer attitudes toward people with disabilities (29.9 percent) and job market opportunities (27.1 percent) were reported highest regarding job-related challenges.
- Individuals with disabilities tended to note all the above barriers less frequently than VR staff or CRPs. This is likely because individuals report only on their own experiences, while staff and CRPs are a smaller population reporting on a much larger population they observe – thus, almost all of that smaller population observes these barriers.
- Recommendation themes from participants include:
    o Decrease process time.
    o Individualize supports and services.
    o Increase communication and decrease meetings.
    o Let participants know all services available to them.
    o Decrease CRP staff turnover.

- Several comments were received regarding capacity concerns and the impact it had on services. Furthermore, several participants mentioned having numerous counselors throughout their case.

VR Staff perception of services highlights include:
- The majority of staff (75.4 percent to 95.3 percent) either strongly agreed or agreed that the participants they work with receive services in a convenient place, can get around easily in VR offices and other meeting places, the VR office is open at times that work for their participants, and VR provides participants with reasonable accommodations needed to receive services.
- IN VR staff ranked all employment services at about 75.0 percent or higher as being sometimes or always adequate, except for Self-employment supports which ranked approximately 60.0 percent for always or sometimes adequate.
- IN VR staff reported several service gaps provided by job coaches. These service gaps include not enough providers for specific populations (80.6 percent), not enough staff with the skills needed to support different needs (53.7 percent) and takes a long time to get a job (41.8 percent).

- IN VR staff respondents identified that improved transportation options (56.7 percent) and increased training for employment specialists or job coaches (44.8 percent) needed the most improvement for underserved populations.
- These results are further reflected in the results of focus groups with staff. In those groups, staff spoke frequently about difficulties finding reliable transportation and how that limits employment for people with disabilities. Transportation issues are more pronounced in rural areas which rarely have access to meaningful public transportation and often have limited commercial transportation options such as taxis, Uber, and Lyft.
  - Additionally, in focus groups staff discussed individuals with mental health concerns and also identified them as an underserved group within the survey results. Staff were concerned about the training of providers in working with individuals with behavioral health conditions, medication compliance of the individuals being served, and the overall difficulty related to accessing treatment.
- The most prominent barriers reported by IN VR staff included:
  - **Transportation**–(83.6 percent)
  - **Mental health care**–(58.2 percent)
  - **Housing**–(46.3 percent)
  - **limited work experience**–(65.7 percent)
  - **limited relevant job skills**–(56.7 percent)
  - **Potential loss of financial benefits**–(65.7 percent)
  - **Potential loss of medical** benefits such as Medicare or Medicaid access–(65.7 percent)

CRP perception of services highlights include:
- All CRPs who reported working with IN VR would recommend IN VR services to their colleagues.
- Most CRPs (65.9 percent) agreed or strongly agreed that the network of IN VR service providers in their area meets most needs of individuals with disabilities.
- CRPs reported transportation (78.7 percent), mental health care (44.7 percent), and housing (31.9 percent) as the greatest needs preventing participants from advancing in their careers.
- CRPs reported that potential underserved populations included people who live in rural areas (46.8 percent), people who are homeless (46.8 percent) and people with mental health conditions (44.7 percent).
- Areas of improvement include increased opportunities to support participants in gaining work experience and relevant job skills.

Employer perception of service highlights include:
- More than 50.0 percent of employers worked with VR or a VR employment service provider in the last year.

- All employer respondents indicated they would recommend IN VR services to their colleagues.
- Most employers were either very interested or somewhat interested in learning about the services IN VR provides directly to businesses.
- More than 80.0 percent of all employers were interested in learning about IN VR services to help meet their business needs.
- Employers cited concerns about recruiting, being prepared to support individuals with disabilities, and limited open opportunities as barriers to hiring individuals with disabilities.

Summary: Individuals with the most significant disabilities are well represented in the VR population. Individuals with the most significant disabilities become successfully employed at rates higher than their peers with less impactful disabilities. However, individuals from this population earn less than their peers. This group was reported as well-served by most staff and service providers, with some areas of improvement such as addressing job coaching service gaps, decreasing the length of time it takes to achieve employment, and addressing barriers related to transportation, navigating access to medical and financial benefits, improving opportunities for work experience, and improving training to VR providers and staff.

CSNA Recommendations summary:

The needs assessment highlights strengths and opportunities for the IN VR program. Across the system, stakeholders report insufficient supports for individuals with mental health conditions (more details shared in next section). Respondents report that administrative requirements hinder service delivery, while businesses seek opportunities to grow the sort of labor force they need to expand. While these are great challenges, organizations across the country are tackling these challenges in innovative ways. IN VR has the opportunity to leverage these successful best practices to foster systemic change. In fact, IN VR already engages in a number of initiatives that may reduce the barriers identified through this assessment. IN VR has the opportunity to build on these existing initiatives to further grow and improve services and outcomes.

IN VR has the opportunity to make decisions to align and refine the IN VR system to be most impactful using available resources. **The following recommendations are proposed to increase the efficiency of IN VR services and funds while improving and increasing successful outcomes for IN VR participants (many of the recommendations apply to the CSNA components throughout section B1):**

1. Improve services for targeted populations, including individuals with mental health conditions
2. Review processes to maximize efficiency
3. Improve the transition process for students entering IN VR Services
4. Expand access to postsecondary education and training
5. Help employers create opportunities

6. Consider opportunities for the establishment, development, or improvement of CRPs to reduce waiting times for services, increase capacity for services, and improve the number and quality of employment outcomes.

b. *Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program;*

Across the results of our analysis, BRS has a number of programs and initiatives to strengthen and support the needs of all disability populations. Analysis indicates that there is an opportunity to build upon, and further disseminate, differentiated supports. We explore this in more detail in the Recommendations section of this report.

Minority and ethnic groups were represented in the IN VR population at rates that are similar to the Indiana state population as a whole. When surveyed, Black or African American participants were among the most positive about the quality of services they received; only 20.9 percent reported there were services they required but did not receive, the lowest of any racial group. This group of participants were extremely positive about many aspects of their services and VR staff relationships.

While service rates and experiences are high, Black and African American participants closed successfully 20.2 percent of the time compared to 26.5 percent for all cases. Additionally, African Americans who closed successfully tended to close with lower average wages and fewer hours worked each week. These are indications of lower-quality outcomes, despite being considered successful within this analysis. IN VR is already taking steps to focus on high quality employment outcomes for all participants, as highlighted above, including strategies for increased opportunities for postsecondary training and career pathways and special projects such as Supported Employment plus (SE+) designed to shift individuals from subminimum wage employment to competitive, integrated employment.

IN VR staff and providers identified similar trends in participant needs in both surveys and focus groups when asked about groups that were unserved or not served well enough. Overall, IN VR staff and CRPs both reported that individuals with mental health-related disabilities, those who are homeless or experience barriers to housing, and individuals with criminal records as potentially underserved populations or populations needing more effective services.

Individuals with mental health-related disabilities are the largest group served by IN VR when considering both primary and secondary disabilities. Due to the co-occurrence of mental health needs among individuals with intellectual disabilities, this number potentially understates the prevalence of this need. Both IN VR staff (58.2 percent) and CRPs (44.7 percent) identified mental health care as a frequent barrier to individuals achieving their employment goals. Individuals with mental health-related disabilities along with the lack of accessible care in Indiana reported by professionals in focus groups and interviews were primary themes across all focus groups. The prevalence of mental health needs in the IN VR population suggests there is less concern about

awareness or ability to access IN VR services and more concern about the ability of individuals to receive specific quality services focused on their mental health needs.

In focus groups, both IN VR staff and CRPs expressed that training is needed to help individuals with serious mental health and behavioral needs. This category of service was the one least likely to be considered 'always adequate' by both IN VR staff and CRPs, but was frequently mentioned as needed by most or all of the individuals seeking services. While IN VR does not directly provide many of the mental health services required by individuals seeking employment, IN VR could strengthen partnerships with other service providers and state agencies that do provide these services in order to help individuals connect with them.

Individuals experiencing other barriers, like homelessness or criminal convictions, were also a major focus in both IN VR staff and CRP surveys and focus groups. These barriers to employment often co-occur with mental health needs. In interviews, those who provide transition services from incarceration to the community indicated that the quality of their relationships with IN VR staff was inconsistent and sometimes difficult to navigate. They cited limited numbers of IN VR staff and the importance of—and difficulty with—connecting individuals to the large variety of systems intended to benefit them. They requested additional, straightforward information and materials on VR services and how best to access them.

Applicable Recommendations

1. Improve services for targeted populations, including individuals with mental health conditions
2. Review processes to maximize efficiency
3. Expand access to postsecondary education and training

   c. *Individuals with disabilities served through other components of the workforce development system; and*

Participants reported high levels of satisfaction with IN VR coordination with outside service providers (66.3 percent reporting services were coordinated somewhat or very well), and a similar rate of service providers agreed.

In interviews with other state agencies focused on workforce development, who frequently work with individuals with and without disabilities, providers mentioned difficulty coordinating services with IN VR while Order of Selection priorities were in effect. Many service providers who work with populations who may or may not qualify for VR services are less likely to work with individuals with MSD. As such, their most frequent IN VR experience may be having the individuals they work with put on VR service wait lists. It should be noted that these delays are unlikely to be caused by Order of Selection findings of eligibility; over the period we analyzed, IN VR determined 86.8% of cases to be immediately eligible for services as MSD. However, previously waitlisted individuals might now be able to access provider services. Reaching out to this population may encourage them to return and convert unsuccessful to successful outcomes.

Survey results from those not participating in IN VR services display similar barriers to employment as individuals receiving services. These included concern about transportation, limited work experience, benefits changes, and discrimination. This suggests the improvements that would most benefit current participants would also benefit those who are not yet working with IN VR.

Survey results from businesses expressed a desire to help meet the needs they are well suited to meet. Services employers were most interested in helping young people gain more work experience (83.4 percent very or somewhat interested) and helping them retain employees with disabilities (82.4 percent). These employers generally desired more information about short-term employment options, including internships and apprenticeships, as seen in **Error! Reference source not found.** below.

Employer Interest in IN VR Services

Service	Very Interested (%)	Somewhat Interested (%)	Not Very Interested (%)	Need more Information (%)
Help a person with disabilities participate in an apprenticeship	44.4%	5.6%	5.6%	44.4%
Help a person with disabilities participate in short-term employment	55.6%	5.6%	5.6%	33.3%
Help a person with disabilities participate in an educational fellowship	44.4%	11.1%	11.1%	33.3%
Help a person with disabilities participate in an internship	55.6%	16.7%	5.6%	22.2%

To better serve those not yet working with IN VR, VR services should continue to focus on the core issues that affect most of their existing service population. We see no indication that large new categories of service are required, or that there are needs completely dissimilar to those that IN VR is currently working to address. Although improvements are always possible, IN VR's service offerings are well-targeted towards their current participant population.

Work-experience and skills gains are of interest to (and seen as a barrier to employment) all populations surveyed, including those not yet working with IN VR. This includes employers who expressed interest in learning more about educational and work-based learning experiences that would help young people gain the skills necessary begin building their careers. This is already a focus of IN VR's ongoing efforts, as well as a goal of RSA's Measurable Skill Gains criteria.

Applicable Recommendations:

1. Review processes to maximize efficiency
2. Expand access to postsecondary education and training
3. Help employers create opportunities

d. *Youth with disabilities, including students with disabilities and their need for pre-employment transition services. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under IDEA.*

PCG assessed the needs of individuals with disabilities for transition services and pre-employment transition services (Pre-ETS), and the extent to which such services provided under this Act are coordinated under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.) in order to meet the needs of individuals with disabilities. RSA requires that IN VR reserve 15 percent of their federal funds to provide students with disabilities ages 14 to 22 with Pre-Employment Transition Services (Pre-ETS).

Compared to the ACS estimates, individuals between ages 14 to 22 are represented at over twice the rate individuals in this age range with disabilities appear in the general population. Among individuals ages 22 to 24, the rate is more than three times higher (13.6 percent of the population served, compared to 4.4 percent of the service age population). The large number of individuals ages 14 to 24 may reflect this priority, suggesting that IN VR has implemented effective processes to assist in expanding outreach to youth. IN VR services are targeted toward, and most useful for, individuals just beginning their careers.

IN VR case management data shows that the youngest IN VR participants are most likely to be those with the most significant disabilities. About nine-in-ten individuals aged 21 and younger (90.4 percent) and nearly as many 22 to 24 year olds (89.9 percent) have most significant disabilities and thus are expected to have the greatest need for services.

When they are familiar with these services, VR staff and CRPs are also generally positive about Pre-ETS. A majority of staff believe every Pre-ETS service was either always or sometimes adequate with the exception of work-based learning experiences (47.4 percent indicated these are sometimes or always adequate). However, while positive, this support was not universal. In most cases, less than ten percent of staff stated Pre-ETS were always adequate; only counseling on post-secondary education (15.3 percent) and pre-employment transition coordination (16.9 percent) were considered always adequate by more than ten percent of VR staff. About a third of staff reported they were uncertain about the quality of every Pre-ETS service.

Providers of Pre-ETS services were, unsurprisingly, more positive. About two-thirds to three quarters of providers who work with transition-aged students reported all service categories to be always or sometimes adequate, with a majority of those being always adequate. The exception was work-based learning experiences.

Those who qualify for Pre-ETS services, or have recently qualified for Pre-ETS services, generally stated that they had received those services. The services they reported as most likely to have

required but not received were post-secondary education information (34.1 percent) and instruction in self-advocacy (22.9 percent). But a majority of individuals reported receiving each of the required services.

In interviews, representatives from the IN Department of Education and Youth Workforce Development were enthusiastic about Pre-ETS services in Indiana. They mentioned that urban services–particularly services provided in Marion county–were especially high quality. They believed more rural students had more difficulty accessing services, a common belief among service providers in Indiana. CSNA results do not provide any particular evidence for this claim. They also reported that many students have difficulty accessing services from IN VR until they were in their junior or senior years, and sometimes did not seek service hand-offs until they neared the end or had completed their educational careers.

IN VR services are focused on people in the earliest stages of employment, and there is a strong desire among all stakeholders to build on that expertise. However, getting involved with individuals earlier in their education will build a stronger foundation, particularly for those who will need extra help achieving employment. IN VR is also not necessarily viewed as an important partner for people looking to achieve higher levels of educational attainment. While IN VR staff are largely positive, they find room for improvement in Pre-ETS, and engaging a wider variety of students earlier may help achieve that.

IN VR is taking an active role in promoting themselves as a partner for all students and youth with disabilities, no matter their needs or goals. This includes creative, innovative approaches to informing students and youth about IN VR services through multi-media channels designed to appeal directly to the potential participant instead of the educator, counselor, or parent. While this innovative approach is to be applauded and continued, materials for other partners remain important.

Applicable recommendations:

1. Review processes to maximize efficiency
2. Improve the transition process for students entering IN VR Services

2. *Identify the need to establish, develop, or improve community rehabilitation programs within the State.*

According to the data results we collected during this CSNA process, including the views of existing providers, there are several needs that IN VR could address to improve the quality of services for individuals with disabilities in the state of Indiana. These include:

- Increased access to high-quality training focused on providing services to individuals with mental health needs.
- Exploring opportunities for CRPs to better maintain staff and build experience within the provider workforce.

- Create additional connections and outreach with existing service providers working in mental health, services for unhoused individuals, and groups providing post-secondary education opportunities.
- Transportation services are among the most frequent barriers to employment identified by all groups, and CRPs may need support in adapting to models that provide for—or reduce reliance on—physical proximity.
- Benefits counseling, and fear of losing access to benefits were also major barriers. CRPs may benefit from additional education on benefits structures and the long-term advantages of employment over benefits, so they may better act as advocates for maximizing employment earnings of participants.
- Building provider capacity to serve more individuals and to provide services more timely, supporting participants to achieve employment more rapidly and increasing successful closures.

Addressing the goals listed above is complex. While these goals could potentially be accomplished by establishing or on-boarding new service providers specializing in each of these categories, recent research published by CSAVR[16] suggests that this may not be possible. Staffing levels have been stagnant or falling nationally, and trends suggest this will continue. Establishing new providers seems unlikely to fully meet these goals as the individuals needed to fill administrative positions and provide direct services may not be available.

Rather, IN VR should focus on the development and improvement of providers and programs within Indiana. IN VR already engages in innovative training practices, including innovative funding mechanisms for those trainings. This helps provider staff enhance their skills and become more capable of serving a wider variety of individuals. There are several avenues BRS can take to further support the improvement of CRPs, including:

- Focus training and technical assistance on those areas of identified need.
- Provide additional communication and outreach on the trainings available to CRPs for identified areas of need, such as mental health disabilities. These trainings may also benefit IN VR's own staff or other providers working with populations with disabilities.
- Focus outreach and technical assistance on community programs that specialize in unmet needs. For example, BRS could work more closely with organizations that primarily provide services for unhoused individuals to increase the number of referrals they are able to accept.
- Foster collaboration between CRPs and community organizations that focus on unmet needs, such as transportation and mental health services.

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[16] Provider Capacity Survey – CSAVR – 2024 – Accessed November 20, 2024

These action steps may also help rehabilitation programs in Indiana retain staff. The ability to learn and develop new skills is a major motivator for many employees. By offering opportunities to increase their skills, IN VR may make staying in otherwise challenging positions more appealing.

VR could use technology to support providers in other ways, including:

- Expanding opportunities for virtual/remote service delivery, where appropriate and aligned with participant needs.
- Consider regional rates that reflect criteria such as an area's cost of living, labor market conditions, a plethora/dearth of providers, quality of transportation options, and need for a service/plenty of providers for that service.
- Training and communication on implementing best practices and supporting the most at-need populations.

Additionally, IN VR provides a host of services ranked highly by staff and providers, and their staff are generally well thought of by program participants. Meanwhile, there are potentially thousands of unserved individuals in the state of Indiana, and some current participants report experiencing wait times or waitlists with provider services. Ensuring that existing, high-quality providers have the ability to hire and retain staff or expand their service areas, will allow more individuals to receive services and be served more timely. Access to meaningful training will support CRPs in providing quality delivery of services and improve employment outcomes.

All groups of respondents indicated a need for improved capacity of service providers and a desire for more timely service delivery. IN VR services would likely strongly benefit from implementation of establishment, development or improvement of CRPs to reduce waiting times for services, increase capacity for services, and improve the number and quality of employment outcomes. As outlined in previous sections, it is recommended that BRS focus strategies on strengthening capacity of current providers. Support with expanding staffing, improving staff retention, and the provision of quality training to provider staff are recommended strategies for overall improvements in capacity and outcomes.

BRS entered into contracts with 18 providers in July 2025 following a Request for Funding process, to provide training and technical assistance to VR employment service providers for the improvement and expansion of CRPs. Establishment projects enable CRPs to have access to essential training, including employment specialist training that is ACRE certified. Additionally, establishment project providers can expand their employment teams to grow their employment programs in order to serve more VR participants, improve timeliness in service delivery, and increase overall capacity to improve employment outcomes for VR participants they serve. These establishment projects were designed in collaboration with RSA.

Applicable recommendations:

1. Review processes to maximize efficiency

2. Consider opportunities for the establishment, development, or improvement of CRPs to reduce waiting times for services, increase capacity for services, and improve the number and quality of employment outcomes.

C. Goals, Priorities, and Strategies

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of Section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

1. *Describe how the SRC and the VR agency jointly developed and agreed to the goals and priorities and any revisions; and*

For the original State Plan submission in Spring, 2024, goals, outcomes, and priorities were reviewed and discussed with the State Rehabilitation Council during a September 8, 2023 council meeting, providing an opportunity for input and recommendations. Information was provided to the VR Council for review in advance of the meeting. The council was in agreement with the goals and priorities and commented that they were very comprehensive and aligned with initiatives and identified areas of improvement. The VR Council did not identify any goals and priorities that were missing. There was a recommendation to expand up on the measurement for the percentage of students with disabilities entering into VR reflected in the original state plan submission, including the use of IDOE data to set a goal for the percentage of students with disabilities who enter VR or pre-ETS. An additional measure was added to include this recommendation in the original state plan submission.

PY26-27 State Plan Amendment: The VR Council reviewed draft revisions to goals, priorities and strategies, annual estimates, as well as council input from the original State Plan submission. This review along with council discussion occurred during the Council's November 14, 2025 public meeting. Goals, priorities and strategies have been updated to align with evolving participant and program needs and initiatives and to reflect alignment with the most recent CSNA completed in 2025.

2. *Identify measurable goals and priorities in carrying out the VR and Supported Employment programs and the basis for selecting the goals and priorities (e.g., CSNA, performance accountability measures, SRC recommendations, monitoring, other information). As required in Section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that—*
   A. *Support innovation and expansion activities;*
   B. *Overcome barriers to accessing VR and supported employment services;*
   C. *Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and pre-employment transition services); and*
   D. *Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.*

A. Support innovation and expansion activities.

The Innovation and Expansion authority is utilized to support the Indiana State Independent Living Council (INSILC), as well as new and innovative initiatives that open the door for new employment opportunities for individuals with disabilities and/or increase opportunities for those with the most significant disabilities. This includes continued investment in a VR Business and Community Engagement Director to lead business outreach efforts for the VR program and serve as an initial point of contact for businesses, facilitating necessary connections with resources and partners; also provides technical assistance to local VR field offices on effectively working with businesses, including supporting enhanced opportunities for on-the-job training or other work-based learning for VR participants. Partnership and strong collaboration with community stakeholders and employers continues to support facilitating the connection of employers directly to VR participants who are seeking employment.

PY26-27 State Plan Amendment: BRS conducted a competitive Request for Proposal (RFP) process in Winter 2026 to identify state or public entities to provide technical assistance to businesses through Interagency Cash Transfer Agreements. The scope of work was modeled from a pilot project with Hamilton county to support increased work experience and employment opportunities for VR job seekers. BRS intends to award contracts upon completion of the RFP process, aiming for contracts to begin in early Fall 2026. This initiative will provide expanded opportunities for technical assistance to businesses and increase the VR business network of partners, with the goal of increased employment outcomes.

B. Overcome barriers to accessing VR and supported employment services.

VR recognized individuals with mental health disabilities as an underserved population as outlined in CSNAs from 2019 to the most recent CSNA completed in 2025, in terms of the effectiveness of services and achievement of employment outcomes. A dedicated workgroup was established in 2019 comprised of representatives from VR, DMHA, CMHCs, NAMI, Key Consumer Organization, the Indiana Mental Health Council, and individuals with lived experience. DMHA and VR collectively sought and received an opportunity for training and technical assistance through ODEP, securing two rounds of training and TA. The project focused on capacity building to improve competitive, integrated employment outcomes for individuals with mental health disabilities, including supporting two early adopter Individual Placement and Support (IPS) sites beginning in 2021 and expansion to four sites in early 2024, and further expansion is under consideration.

The reduced capacity of VR employment service providers has led to new challenges with access to employment services, including supported employment services. A number of providers have implemented wait lists for services which has delayed service provision and may have impacted customer engagement. BRS has implemented several strategies to mitigate this challenge, including a rate increase in April 2022 and implementation of performance incentive payments in July 2023. Most recently, after completing all pre-planning requirements, VR entered into Establishment project contracts with 18 VR employment service providers in July 2025 aimed at building provider capacity and improving service delivery toward achievement of more timely and successful employment outcomes for VR participants. Also in 2025, VR collaborated with providers to implement streamlined documentation requirements for employment service delivery.

C. Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and pre-employment transition services).

Indiana VR will strengthen and expand services for students with disabilities by implementing a coordinated, student-centered approach to Pre-Employment Transition Services (Pre-ETS) that emphasizes early exploration, structured progression, and delivery of required activities that lead to the identification of vocational goals. Central to this strategy is the statewide adoption of the Student Career Profile, a living document that captures each student's strengths, interests, supports, and progress across the required Pre-ETS activities. By using this tool consistently, Career Coaches and providers will ensure that services are not only compliant but also purposeful: helping students connect exploration activities to clear vocational goals and transition plans. Coordination will also be enhanced through the new Pre-ETS portal, which streamlines documentation, strengthens alignment with VR services, and reduces administrative burden so providers can focus on direct student engagement.

VR will further expand opportunities by prioritizing vocational goal alignment in every Pre-ETS activity. Career coaches will be expected to connect job exploration, workplace readiness, and postsecondary counseling directly to the student's emerging career interests, ensuring that each

experience contributes to a coherent transition plan. Work-based learning opportunities, including job shadows, internships, and employer panels, will be leveraged to provide hands-on exposure that informs career decisions and builds confidence.

Finally, Indiana VR will maintain strong coordination with partners and resources such as WorkOne, Bureau of Disability Services, Independent Living Centers, and postsecondary disability services. With appropriate consent, Student Career Profiles will be shared with schools to support IEP transition planning, ensuring continuity across systems. Thoughtful onboarding and exit strategies will guide students into individualized VR services when their vocational needs extend beyond Pre-ETS, creating a seamless bridge from school to postsecondary life.

Through these strategies, structured documentation, sequenced service delivery, vocational goal alignment, and coordinated partnerships, Indiana VR will improve and expand services for students with disabilities, ensuring equitable access, meaningful experiences, and successful transitions to postsecondary education, employment, and adult life.

D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes.

Goal 1: Sustain high quality VR service delivery to a growing population

Priority 1.1: Rapid and quality engagement of individuals

Basis: From PY17-PY23, (SFY18-SFY24), expenses for employment services increased 25%, with most of the increase resulting from increased service expenditures to providers for hourly Discovery (assessment and career exploration), which increased 75% during that same time period. The portion of overall employment service spend on Discovery service expenses substantially increased, rising from approximately 32% to a peak of over 44% in PY23 (SFY24), while the portion of expenses on placement and support services remained fairly level during that time. After conducting case reviews, some participants were remaining in discovery for six months to a year. Employment outcomes were also relatively flat during this time period. To support a more balanced use of funds across employment services while aiming to improve employment outcomes and assist job seekers to secure employment more rapidly, VR provided updated training, issued guidance and clarification, and implemented service authorization standards and best practices in early CY25. Since then, great progress in shifting dollars to direct placement and support services has been achieved, along with increased outcomes for PY24 (SFY25) of 43% over the prior year. This shift also aligns with feedback from VR customer satisfaction surveys and the most recent CSNA regarding a need for decreased time to receive services and obtain employment. The CSNA also garnered feedback from participants and stakeholders regarding a need to identify efficiencies, streamline processes, and reduce complexity.

- Strategy 1.1a: Implement and monitor strategies to support rapid movement to job search to achieve a streamlined service model focused on measurable employment outcomes. Allocation of resources and staffing capacity for purchased employment services will reflect a shifting of resources to meaningful job placement, support and retention activities.

At least 75% of total Employment Services expenditures will be directed toward job placement, support, and retention activities by end of state plan period (baseline data required to establish benchmarks).

- Strategy 1.1b: Review processes to identify opportunities to streamline or modernize, such as exploration of improved service delivery structures, increased pathways to employment, and opportunities for increased efficiency with information technology systems. Implement at least 2 strategies each year during state plan period.

- Strategy 1.1c: Explore opportunities for streamlining service delivery through braiding and sequencing VR services with other programs and resources, including Bureau of Disability Services (BDS) and Division of Mental Health and Addiction (DMHA). Identify and implement at least two strategies during the state plan period.

- Strategy 1.1d: Continue to focus training efforts to VR Counselors on the importance of quality interactions with participants and intentional service delivery. This approach reinforces consistent expectations and builds internal capacity for effective, person-centered service delivery. Training or technical assistance related to this topic area will be provided at least twice per year during the state plan project period, such as technical assistance provided in regional staff meetings, Friday field chats, or statewide training opportunities.

Priority 1.2: Improve the effectiveness of pre-employment transition services while meeting growing demand for services.

Basis: There has been lack of a clearly identified objective, or outcome, that is expected to result from delivery of Pre-ETS required activities. As such, there is missed opportunity to better leverage Pre-ETS for initial career exploration in a consistent manner, as well as missed opportunity to effectively sequence Pre-ETS activities with other resources. For instance, there is not a clear process to document an identified vocational pathway that may have been identified while a student received pre-ETS activities, so there is a disconnect when that student enters a workforce program such as VR. Additionally, BRS has received feedback from pre-ETS providers on exploring opportunities for improved streamlining in pre-ETS documentation processes.

Strategy 1.2a: Identify and implement promising practices that improve the delivery of required Pre-ETS and transition activities, with emphasis on intentional service objectives and meaningful vocational planning. Launch a standardized Career Profile by March 2026 to support goal-driven service delivery aimed at identifying vocational goals, better sequencing pre-ETS activities across systems, and reducing duplication. Identify and implement at least one additional strategy annually during the state plan period to further streamline processes and build internal capacity.

Strategy 1.2b: Improve the effectiveness and efficiency of Pre-ETS service delivery and administration by consolidating systems and enhancing referral processes. By July 2026, implement targeted improvements that reduce duplication, support timely service initiation, and strengthen coordination across internal workflows. At least one additional strategy will be identified

and implemented annually throughout the state plan period to further refine operations, elevate service quality, and build sustainable infrastructure.

Overall measure: Continue to serve all eligible individuals while meeting or exceeding eligibility and service plan development federal timeliness standards at least 95% of the time.

Goal 2: Improve quality and quantity of outcomes

Priority 2.1: Build VR service delivery capacity, including increased capacity of vendors to provide timely and quality services.

Basis: Many VR employment service providers have implemented wait lists or waiting periods for new referrals from VR. Providers report experiencing significant turnover of staff and this was validated through a quarterly provider capacity survey VR conducted during 2022. 76.7% of respondents indicated they experienced 1-2 vacancies each quarter during 2022. This is significant when considering that most providers, well over two-thirds, have 7 or less staff with half of those employing 3 or less staff. The survey results indicate that the vacancy rate accounts for 50-100% turnover for teams of 4 or less, and 14-40% turnover for teams of 5-7.

- Strategy 2.1a: Evaluate the impact of Employment Service Provider performance outcome payments implemented in July 2023. Evaluation will be completed before the end of the state plan period, including identification of applicable revisions.
- Strategy 2.1b: Pursue opportunities for enhanced training and technical assistance to VR Employment Service providers with the goal of improving provider performance and outcomes, such as through the Establishment authority, disability innovation funds, or other allowable sources of funds. Training and technical assistance will begin during the state plan period. The most recent CSNA (Section B) has been updated to reflect specific strategies for improvement and expansion of CRPs through Establishment projects, including access to employment specialist training that meets ACRE competencies, targeted technical assistance for the improvement of the CRP, and supports for potential growth or expansion in order to increase capacity to serve more VR participants and improve the timeliness and quality of services.

Priority 2.2: Increase participation in work-based learning opportunities and attainment of measurable skills gains or credentials

Basis: While BRS exceeded the negotiated measures for measurable skill gains and credential attainment rate for PY22, only 13% of VR participants were enrolled in a training program or activity that leads to a measurable skill gain or credential (data source: RSA dashboard report PY22 Q4). Additionally, individuals who participate in work-based learning are more likely to achieve employment, and therefore increasing these opportunities is an important strategy in improving employment outcomes.

- Strategy 2.2a: Increase work-based learning opportunities for VR participants, to include revising and distributing updated guidance to VR staff on opportunities for work based

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learning throughout PY25 and PY26 and improved tracking of expenditures on this valuable activity. Evaluate the effectiveness of increased work based learning opportunities throughout the state plan period, and identify recommendations for further improvement.

- Strategy 2.2b: Improve VR participant opportunities for gainful employment through increased attainment of industry recognized credentials. Training will be provided to VR staff to increase knowledge of in-demand occupations. VR will partner with industry experts to develop relevant tools or resources to support improved vocational guidance and counseling with participants on in-demand industries as they identify vocational goals. Training and resources will be developed in PY26 and delivered to staff by PY27.

Overall measure: Total number of participants exiting with employment will increase by at least 40% by the end of the four year state plan period (PY22 baseline: 1,454; data source: RSA Dashboard report), with average hourly wages increasing by at least 15% by the end of the four year state plan period (PY22 baseline: $15.10; data source: RSA Dashboard report).

<u>Supported Employment Goal</u>

Priority 2.3: Increase the quality of outcomes for individuals receiving supported employment services.

Basis: The average wages for those who received supported employment services and exited VR with an employment outcome are significantly lower than overall average wages for all employment outcomes ($11.71 compared to $15.10 in PY22; data source: Aware and Tableau dashboard). Additionally, the average weekly work hours for those receiving supported employment services has remained steady for many years at approximately 20 hours per week, (data source: Aware and Tableau dashboard) with limited or no growth from year to year.

- Strategy 2.3a: BRS will identify and implement strategies to improve the quality of employment outcomes for individuals receiving supported employment services, such as identifying opportunities for enhanced counseling on benefits and work incentives, continued collaboration with the Bureau of Disabilities services to promote competitive integrated employment for individuals with developmental and intellectual disabilities, expansion of Individual Placement and Support in collaboration with the Division of Mental Health and Addiction, and evaluating the Supported Employment plus (SE+) Disability Innovation Fund project to identify emerging best practices. At least three strategies will be implemented during the State Plan project period.
- Strategy 2.3b. Priorities and strategies 2.1-2.3 under goal 2 outlined above, are applicable to supported employment services. BRS is targeting a 15% increase in average wages for individuals exiting VR after receiving supported employment services by the end of the state plan period. (PY24 baseline average wages for individuals receiving supported employment services: $13.71; data source: Aware).

D. Evaluation and Reports of Progress: VR and Supported Employment Goals

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

1. *Progress in achieving the goals and priorities identified for the VR and Supported Employment Programs;*

Evaluation and Reports of Progress: Vocational Rehabilitation

Goal 1: Sustain high quality VR service delivery to a growing population

Priority 1.1: Rapid and quality engagement of individuals

- Strategy 1.1a: Decrease time from application to eligibility. Average days from application to eligibility will average 30 days or less by the end of the state plan period. (PY22 baseline: 36.0; data source: Aware and Tableau dashboard KPI Average Days in Applicant Trend).
- Outcome 1.1a. On Track. Average days from application to eligibility has improved slightly as of the end of PY24, at 35.3 days. This remains well behold the federal timeliness standard of 60 days. While VR will continue to efficiently process new applications and eligibility determinations, factors such as increased demand for services and personnel capacity significantly impact progress with this strategy. For instance, the number of applicants has increased 20% since baseline, with approximately 1,000 more individuals applying for services in PY24 as compared to PY22.
- Strategy 1.1b: Review processes to identify opportunities to streamline or modernize, such as provision of specific services including hearing aid devices, and opportunities for increased efficiency with information technology systems. Implement at least 2 strategies each year during state plan period.
- Outcome 1.1b: Achieved. The documentation and procedural processes for hearing aid evaluations and purchases were streamlined this past year. Additionally, BRS leveraged Salesforce to streamline and improve consistency in post-secondary service funding determinations. Additional improvement were implemented to other VR systems to better support day to day case management, program evaluation, and reporting processes, such as the implementation of dashboards in Aware and increased Tableau data workbooks.
- Strategy 1.1c: Explore opportunities for streamlining application or eligibility determination processes with other agencies, including Bureau of Disability Services (BDS) and Division of Mental Health and Addiction (DMHA). Identify and implement at least two strategies during the State Plan period.
- Outcome 1.1c: Achieved. BRS leadership has actively participated in BDS initiatives aimed at increasing employment outcomes for BDS participants, including participation on

projects supported by the Supported Employment Leadership Network (SELN) and waiver reset efforts. Opportunities for sequencing services have been explored through the Supported Employment plus (SE+) project, such as leveraging Home and Community Based Waiver services prior to individuals entering VR, to increase access to employment, such as providing career exploration services through day services. Additionally BDS has recently added benefits counseling supports as an eligible Waiver services and this brings sequencing opportunities to more comprehensively support benefits and work incentive counseling services for job seekers with disabilities. BRS also continues to collaborate with DMHA and has been successful in streamlining VR application and eligibility processes for Individual Placement and Support Sites.

- Strategy 1.1d: Continue to focus training efforts to VR Counselors on the importance of quality interactions with participants. Training or technical assistance related to this topic area will be provided at least twice per year during the state plan project period, such as technical assistance provided in regional staff meetings, Friday field chats, or statewide training opportunities.
- Outcome 1.1d: Achieved. Training and guidance has been provided through many avenues, including statewide training opportunities, regional meetings, and less formal field chats. The 43% increase in exits with employment from PY23-PY24 may be an indicator that efforts are having a positive impact.

Priority 1.2: Serve all eligible individuals

Basis: BRS has been operating under an order of selection since August 2017 and has retained a goal of opening all service categories and ending the order of selection. This goal remains a priority so that all eligible individuals can receive services. This will not only benefit eligible individuals in need of VR services, but may also contribute to improved trends in the number of individuals receiving services and exiting with employment.

- Strategy 1.2a: Continue quarterly order of selection waitlist releases until all eligible individuals on the wait list are offered services. All service priority categories will be open by December 2024.
- Outcome 1.2a. Achieved. The order of selection waitlist was eliminated in October, 2024.

Priority 1.3: Increase participation of students and youth in the VR program

Basis: There has been a decline in the percent of VR participants served who are students and youth (age 24 and younger) with disabilities from 48% in the fourth quarter of PY20 to 39% in the fourth quarter of PY22 (data source: RSA dashboard report). This could have been impacted by the growth in the number of students served in pre-ETS from PY 20 to PY22, but remains an area of needed improvement. Additionally, only 9% of students receiving pre-ETS are applying for VR services as of the end of PY22 (data source: RSA dashboard report). RSA has indicated that this is below average compared to other state VR agencies.

- Strategy 1.3a: Provide training to pre-ETS providers on the VR referral process and the role they can play in facilitating referrals of students with disabilities. Training will be conducted annually, resulting in a 10% increase in the portion of pre-ETS students who apply for VR services each year (PY22 baseline: 9%; data source: RSA dashboard report).
- Outcome 1.3a: On track. Training was completed and Pre-ETS contracts were amended to establish targets for the increase in students receiving Pre-ETS who enter VR. As of PY24 quarter 4, 14% of all students with disabilities receiving Pre-ETS applied for VR services, reflecting a 5% increase over the last two years.
- Strategy 1.3b: Review referral practices with schools and local VR offices and address areas of improvement as needed to support an increase of student applications to VR. The number of students entering VR or pre-ETS will represent at least 30% of students age 14-22 receiving services through an IEP or 504 plan reported by IDOE annually (current performance for PY22: 16,545 or 26% of students reported on RSA PY22 dashboard report, of 15,100 students age 14-22 with 504 plan and 38,169 students 14-24 on IEP as reported by IDOE December 2022).
- Outcome 1.3b: Achieved. There were 20,293 students with disabilities reported across VR and pre-ETS at the end of PY24, representing a 23% increase in students enrolled in pre-ETS or VR services over the last two years. IN IDOE total IEP counts were pulled across all high schools (42,807) along with total students age 14-22 on 504 plans (20,740). The student population in VR and pre-ETS represents 32% of the IN IDOE population of students with disabilities.
- Strategy 1.3c: Youth VR counselors will support efforts to increase the number of potentially eligible Pre-ETS students who apply to VR, through a comprehensive review of pre-ETS cases annually. Youth VRCs will identify students who need referral to VR, including those nearing exit from school and will facilitate the referral process as needed. This review will be conducted by December of each academic year.
- Outcome 1.3c: Achieved. VR Youth Counselors expanded their focus on increasing student referrals to VR through case reviews, increased presence at local schools, and enhanced troubleshooting with local transition stakeholders to support wide availability of pre-ETS across the state for students who need these services. As noted under outcome 1.3a, the portion of students receiving pre-ETS who enter VR increased by 5%. The VR Youth Counselor priorities are regularly reviewed to ensure alignment as program needs evolve, and will shift their focus to support priorities and goals outlined in section 2.B. and 2.C.
- Strategy 1.3d: Identify promising practices in the delivery of required Pre-ETS and transition activities, such as Seamless Transition projects in partnership with BDS, the use of peer mentors for students with disabilities, increased student involvement in the development of Pre-ETS curricula at the local level, and coordination with Indiana Career Explorer on transition related initiatives. At least one promising practice will be implemented annually during this state plan period.

Outcome 1.3d: Achieved. BRS advanced several promising practices over the last two years that strengthen the quality, consistency, and intentionality of Pre-ETS statewide. A major area of progress has been the development and expansion of comprehensive Pre-ETS curricula, including the Students with High Support Needs series, the Career Coach Foundations curriculum, and the Coaching for Pre-ETS Success model. These resources provide a unified foundation for service delivery, support new staff onboarding, and help career coaches implement evidence-based, student-centered practices across all regions. In PY25, BRS implemented targeted statewide training on the Student Career Profile (SCP) and service sequencing. These trainings emphasized aligning Pre-ETS activities with each student's strengths, interests, and vocational goals, reducing duplication, and improving coordination with school-based transition planning. Monthly provider updates have further strengthened communication by offering timely clarification on expectations, system changes, and best practices. BRS is preparing to re-launch Communities of Practice in PY26. These will reinforce consistent implementation and support shared learning across providers.

Overall measure: VR participant attrition will decrease by at least 10% during the state plan period (PY22 Q4 RSA Dashboard baseline: Of all exits for that quarter, 60.7% exited VR services after eligibility and prior to signed IPE or after IPE without an employment outcome)

Overall outcome: Achieved. PY24 Q4 RSA Dashboard reflects 48.2% exiting VR services after eligibility and prior to signed IPE or after IPE without an employment outcome, a 12.5% improvement over a two year period.

Goal 2: Improve quality and quantity of outcomes

Priority 2.1: Build VR service delivery capacity, including increased capacity of vendors to provide timely and quality services

Basis: Many VR employment service providers have implemented wait lists or waiting periods for new referrals from VR. For example, in the Indianapolis area, the largest metropolitan region in the state, VR field managers have reported that all providers serving the area except for two, have had a wait list over the last year. This accounts for at least 90% of providers serving the Indianapolis and surrounding area. Providers report experiencing significant turnover of staff and this was validated through a quarterly provider capacity survey VR conducted during 2022. 76.7% of respondents indicated they experienced 1-2 vacancies each quarter during 2022. This is significant when considering that most providers, well over two-thirds, have 7 or less staff with half of those employing 3 or less staff. The survey results indicate that the vacancy rate accounts for 50-100% turnover for teams of 4 or less, and 14-40% turnover for teams of 5-7.

- Strategy 2.1a: Evaluate the impact of Employment Service Provider performance outcome payments implemented in July 2023. Evaluation will be completed before the end of the state plan period, including identification of applicable revisions.
- Outcome 2.1a. Achieved. An evaluation of the provider performance incentive payment model was completed in PY25. As of December 2025, over $400,000 has been paid to

providers for participant outcomes meeting criteria for one, or more benchmarks. Recommendations from the evaluation included providing clarification on criteria for achieving the benchmarks and implementing a process to review the hourly wage threshold to maintain alignment with adjustments to living wages in Indiana.

- Strategy 2.1b: Pursue opportunities for enhanced training and technical assistance to VR Employment Service providers with the goal of improving provider performance and outcomes, such as through the Establishment authority, disability innovation funds, or other allowable sources of funds. Training and technical assistance will begin during the state plan period. The most recent CSNA (Section B) has been updated to reflect specific strategies for improvement and expansion of CRPs through Establishment projects, including access to employment specialist training that meets ACRE competencies, targeted technical assistance for the improvement of the CRP, and supports for potential growth or expansion in order to increase capacity to serve more VR participants and improve the timeliness and quality of services.
- Outcome 2.1b: Achieved. Establishment contracts were implemented in July, 2025 with 18 VR employment service providers, following a request for funding process. Providers are using these funds to support relevant training for newly onboarded employment services staff, as specified in these contracts.

Priority 2.2: Increase VR participant access to multiple pathways to employment

Basis: Given the service provider capacity challenges described above, as well as the need to support a more diverse population as BRS prepares to open all service priority categories, additional paths to employment will be necessary to more adequately meet the needs of VR participants.

- Strategy 2.2a: Enhance existing or develop new pathways for service delivery so that VR participants have access to a variety of pathways to pursue employment services. This may include enhancement of VR led virtual job clubs, expansion of the vendor recruiter role, expanding employment services in CMHCs in partnership with DMHA including expansion of Individual Placement and Support, enhancing the role of the WIOA Navigators, and exploring provider requirements to identify opportunities to expand the network of service providers. At least three pathways will be enhanced for greater access, or a new pathway developed, during the State Plan period.
- Outcome 2.2a: Achieved. Several strategies were piloted, including WIOA navigators in several workforce regions, virtual job clubs, and expanding IPS pilot sites from two sites to four sites in partnership with DMHA.

Priority 2.3: Increase participation in work-based learning opportunities and attainment of measurable skills gains or credentials

Basis: While BRS exceeded the negotiated measures for measurable skill gains and credential attainment rate for PY22, only 13% of VR participants were enrolled in a training program or activity that leads to a measurable skill gain or credential (data source: RSA dashboard report PY22 Q4).

Additionally, individuals who participate in work-based learning are more likely to achieve employment, and therefore increasing these opportunities is an important strategy in improving employment outcomes.

- Strategy 2.3a: Increase work-based learning opportunities for VR participants, which may include opportunities for increasing On-the-job training (OJT) services, increased partnerships with businesses to host participants, creating internship or apprenticeship opportunities with VR partners, or other work-based learning activities such as through pre-employment transition services or the supported employment plus (SE+) project. At least three new work-based learning strategies will be implemented during the State Plan project period.
- Outcome 2.3a: Achieved. A pilot project was implemented in PY23 to increase technical assistance to businesses via an interagency cash transfer agreement with a local public entity, and the project will continue through PY25. Based on lessons learned from this pilot, BRS issued a request for proposal in December 2025 to expand to other communities. Additionally, BRS issued updated guidance on work-based learning experience service requirements to VR staff in December, 2025 to clarify use of the services and strategies to incorporate work-based learning into VR participants' cases. VR service codes were also expanded to better track the authorization of utilization of work-based learning experience services. This will also lead to establishing a more comprehensive baseline for number of participants accessing work-based learning experiences, in order to measure progress for the remainder of the State Plan period.
- Strategy 2.3b: Increase enrollment of VR participants in postsecondary training. Identify and implement strategies to increase enrollment such as continued targeted training to VR postsecondary Counselors, revisiting postsecondary education funding determination procedures, increasing outreach to students, and increasing provision of counseling on postsecondary opportunities through pre-ETS. The number of VR participants enrolled in postsecondary education will increase by 10% each year during the state plan period (PY22 Q3 baseline: 503 participants received training services including occupational or vocational training, junior or community college training, four-year college or university training, or graduate college or university training; Data source: RSA Dashboard report PY22 Q3).
- Outcome 2.3b: Achieved. 768 VR participants received training services including occupational or vocational training, junior or community college training, four-year college or university training, or graduate college or university training in PY24 Q3, a 53% increase from baseline.

Overall measure: Total number of participants exiting with employment will increase by at least 25% by the end of the state plan period (PY22 baseline: 1,454; data source: RSA Dashboard report), with average hourly wages increasing by at least 15% by end of the state plan period (PY22 baseline: $15.10; data source: RSA Dashboard report).

Overall Outcome: Achieved. BRS has exceeded this goal within the first year of the state plan, with a 44% increase in exits with employment from PY22 to PY24, with 2,091 exits with employment in PY24. Average hourly wages for PY24 were $17.97, a 19% increase from baseline.

<u>Evaluation and Report of Progress: Supported Employment</u>

Priority 2.4: Increase the quality of outcomes for individuals receiving supported employment services.

Basis: The average wages for those who received supported employment services and exited VR with an employment outcome are significantly lower than overall average wages for all employment outcomes. ($11.71 compared to $15.10 in PY22; data source: Aware and Tableau dashboard). Additionally, the average weekly work hours for those receiving supported employment services has remained steady at approximately 20 hours per week, (data source: Aware and Tableau dashboard) with limited or no growth from year to year.

- Strategy 2.4a: BRS will identify and implement strategies to improve the quality of employment outcomes for individuals receiving supported employment services, such as identifying opportunities for enhanced counseling on benefits and work incentives, continued collaboration with the Bureau of Disabilities services to promote competitive integrated employment for individuals with developmental and intellectual disabilities, expansion of Individual Placement and Support in collaboration with the Division of Mental Health and Addiction, and evaluating the Supported Employment plus (SE+) Disability Innovation Fund project to identify emerging best practices. At least three strategies will be implemented during the State Plan project period.
- Outcome 2.4a: Achieved. BRS piloted an expansion of benefits and work incentives counseling services through Disability Innovation Funds and has applied lessons learned to redesign the benefits counseling service structure across the state. Enhancements will be implemented in July, 2026 which will include tiered services to better meet benefits and work incentive counseling service needs of participants. BRS has continued to collaborate with both BDS and DMHA on employment initiatives, including active participation in employment transformation initiatives and expansion of IPS. The DIF SE+ project continues through June, 2027 with five pilot sites across 10 different geographic areas. Through this project, over 70 individuals have secured employment, including individuals who had never previously worked outside of a subminimum wage setting.
- Strategy 2.4b. Priorities and strategies 2.1-2.3 under goal 2 outlined above, are applicable to supported employment services. BRS is targeting a 15% increase in average wages for individuals exiting VR after receiving supported employment services by the end of the state plan period. (PY22 baseline average wages for individuals receiving supported employment services: $11.71; data source: Aware Closed Rehabilitated layout, filtered for SE on IPE.)
- Outcome 2.4b: Achieved. PY24 employment outcomes for individuals exiting VR with employment with Supported Employment on their Individual Plan for Employment (IPE), achieve average wages of $13.71. This reflect a 17% increase in average hourly wage.

2. *Performance on the performance accountability indicators under Section 116 of WIOA for the most recently completed program year, reflecting actual and negotiated levels of performance. Explain any discrepancies in the actual and negotiated levels; and*

Outcome: BRS exceeded the negotiated level of performance for credential attainment rate and remains in the top 25% of combined VR agencies nationally in this area (ranked 7 of 52 for PY24). Performance in other areas was slightly below the negotiated target, however overall performance remains compliant with the 90% standard. The table immediately below outlines PY24 negotiated targets and actual performance, while the subsequent table outlines performance across the last four years.

Program Year 24	Negotiated	Actual	Result
Employment Rate Q2	60.7%	56.2%	Met; within 90% (92.5%)
Employment Rate Q4	58.4%	54.3%	Met; within 90% (93%)
Median Earnings	$3,739	$3,537	Met; within 90% (94.6%)
Credential Rate	48.2%	53.4%	Exceeded
Measurable Skill Gains	65.7%	55.5%	Did not meet

BRS has made notable improvement in credential attainment rate, and has performed similarly across other program metrics over the last four years. While performance in MSG decreased in PY24, BRS' performance on this indicator remains above the national average for combined VR state agencies. The Indiana program remains above the national average for all combined VR agencies for all performance indicators, with the exception of median earnings. Indiana VR's performance on credential attainment rate ranks in the top 25% of the VR combined agencies across the nation, while employment rate (second and fourth quarter) and measurable skills gains rank in the top 50%. The goals, priorities and strategies included in the updated state plan aim to support improved performance across all indicators. BRS is exploring additional strategies to raise MSG performance back up to over 60%.

Program year	2021	2022	2023	2024
Employment Rate Q2	56.0%	60.4%	57.6%	56.2%
Employment Rate Q4	51.4%	57.9%	55.9%	54.3%
Median Earnings	$3,448	$3,562	$3,479	$3,537

Program year	2021	2022	2023	2024
Credential Rate	34.5%	47.7%	51.7%	53.4%
Measurable Skill Gains	63.5%	65.2%	62.8%	55.5%

3. *The use of funds reserved for innovation and expansion activities (Sections 101(a)(18) and 101(a)(23) of the Rehabilitation Act) (e.g., SRC, SILC).*

VR continued to support the Indiana Statewide Independent Living Council (INSILC) with VR funds reserved for I&E activities. These funds support the council in carrying out their core functions and meet goals outlined in the State Plan for Independent Living (SPIL). The State Rehabilitation Council is also supported by BRS, including through the provision of communication accommodations for public meetings and BRS personnel time for the coordination of council materials including meeting materials and the Annual Report. VR has also maintained a business and community engagement Director who has a presence across Indiana to share resources and educate businesses about opportunities to employ individuals with disabilities. They also provide technical assistance to VR staff to support local business engagement efforts.

E. Supported Employment Services, Distribution of Title VI Funds, and Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

1. Acceptance of Title VI funds:

☒ *VR agency requests to receive title VI funds.*

☐ *VR agency does NOT elect to receive title VI funds and understands that supported employment services must still be provided under title I.*

2. If the VR agency has elected to receive title VI funds, Section 606(b)(3) of the Rehabilitation Act requires VR agencies to include specific goals and priorities with respect to the distribution of Title VI funds received under Section 603 of the Rehabilitation Act for the provision of supported employment services. Describe the use of Title VI funds and how they will be used in meeting the goals and priorities of the Supported Employment program.

Please see section C. Goals, Priorities, and Strategies, priority 2.3 for Supported Employment strategies.

Indiana receives approximately $340,000/year of Title VI B funds to provide supported employment (SE) services. VR has made a commitment to serve people with the most significant disabilities and

also utilizes Title I dollars to serve this population. VR spent more than $6M million on hourly SE services and milestones and youth extended services in PY24 and anticipates providing SE services to over 1,900 individuals in PY25 as well as in PY26. Supported employment services are carried out by accredited employment service providers and follow requirements outlined in the VR employment services manual.

For participants with intellectual/developmental disabilities eligible for services under the Bureau of Disabilities Services (BDS), VR works collaboratively with BDS to provide SE services and seamless transition to extended services. The initial job placement, training and supports needed for stabilization are typically provided through VR. Extended Services through BDS, natural supports or other funding, e.g., Medicaid Rehabilitation Option, provide additional work-related supports needed by the individual to continue to be as independent as possible in competitive, integrated employment. For BDS participants, ongoing employment support services are identified in the participants' Individualized Support Plan and must be related to the participants' limitations in functional areas (i.e., self-care, understanding and use of language, learning, mobility, self-direction, capacity for independent living, economic self-sufficiency), as are necessary to maintain employment. As an individual reaches stabilization on the job, VR initiates documentation to BDS to facilitate transfer to extended services, ensuring this documentation is provided at least 60 days prior to expected transition to extended services, helping prevent any gap in receipt of needed supports as an individual transitions to VR exit. Extended Services are provided in competitive, integrated settings where persons without disabilities are also employed. Extended Services do not include sheltered work or other similar types of vocational services furnished in specialized facilities or volunteer endeavors.

BRS also worked in collaboration with the Division of Mental Health and Addiction and Office of Medicaid Policy and Planning to develop written guidance on the utilization of Medicaid Rehabilitation Option (MRO) to support individuals in extended services. The braiding of VR and MRO funding has been critical in the implementation of early adopter Individual Placement and Support (IPS) sites.

VR provides funding for extended services for youth with a most significant disability, for up to 4 years, for individuals who are not BDS eligible or do not have another means of obtaining necessary extended services. Joint training has been provided to both VR and employment service provider staff on VR-funded extended services, including the process for requesting services, documentation requirements, and criteria for receipt of services. Expectations for youth extended services are also outlined in the VR employment services manual.

3. *Supported employment services may be provided with Title 1 or Title VI funds following placement of individuals with the most significant disabilities in employment. In accordance with Section 101(a)(22) and Section 606(b)(3) of the Rehabilitation Act, describe the quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities; and the timing of transition to extended services.*

Indiana's Supported Employment (SE) services are highly individualized and involve ongoing support services and other appropriate services needed to support and maintain an individual with the most significant disability (MSD), including youth with the most significant disabilities, in SE for a period of time that generally does not exceed 24 months. Such services, such as job coaching, are for individuals who have SE and long-term supports identified on the Individualized Plan for Employment (IPE). Often, because of the nature and severity of the individuals' disability, there is a need for extended services that are provided by a State agency, private nonprofit organization, natural supports, or any other appropriate resources that are funded outside of VR. VR funding is available for the provision of extended services to Youth with a MSD, for a period not to exceed four years (unless a longer period is established in the IPE). Extended services would typically begin once the youth has exhausted 24 months of SE services and is not eligible for extended services through other sources.

Eligible VR participants with a MSD obtain SE services through accredited Community Rehabilitation Programs (CRPs) across the state. SE services are provided from the time of job placement through achievement of stabilization and retention (90 days after stabilization). The expected outcome of SE services is to ensure that stabilization on the job has appropriately occurred after a period of gradually decreasing needed supports and a correlated demonstration of increased independence. The intensive level of support needs should be well-documented by the CRPs and the expectation of fading (i.e., decreasing the amount of support as a consumer becomes more proficient in completing job duties) is important to reach optimal independence. VR acknowledges that fading of supports may not always occur in a completely linear process, and levels of SE support may ebb and flow depending on the needs of the individual. However, a pattern of increased independence and reduced need for support (fading) should be evident prior to the identification that stabilization has occurred for an individual needing SE services. More specifics regarding Supported Employment may be found in the VR Manual of Employment Services.

BRS administers two Title VI grants: Supported Employment which is 100% federal and is used for the provision of supported employment services for eligible individuals of any age; and Supported Employment for Youth which requires a 10% non-federal match provided be BRS, and supports the provision of supported employment services specifically for eligible youth, including extended services for youth. BRS adheres to limits on the use of SE grant funds for administrative costs, typically using 100% of SE grant funds for direct service provision.

4. *Sections 101(a)(22) and 606(b)(4) of the Rehabilitation Act require the VR agency to describe efforts to identify and arrange, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services. The description must include extended services, as applicable, to individuals with the most significant disabilities, including the provision of extended services to youth with the most significant disabilities in accordance with 34 C.F.R. § 363.4(a) and 34 C.F.R. § 361.5(c)(19)(v).*

It is critical that early conversations take place regarding the anticipated need for extended services between VR, the participant and the CRP to begin planning for the transition to extended services, including the possibility of VR funding youth extended services if these needed supports are not otherwise available. It is important to recognize the impact that a good job match with appropriate and intensive ongoing supports may have on the amount and type of extended services an individual may need long term in order to maintain his/her job. It is also valuable to begin identifying and exploring natural supports an individual may have available to him/her early in the process. When it has been determined that a participant is approaching stabilization on the job, the process to transition to extended services begins, and this process must identify the participant's ongoing specific need(s), types of supports and services, the sources of extended services, and the projected number of hours of support needed. VR Counselors are required to assist in facilitating the seamless transition to extended services funded by other entities, prior to VR case closure. The Stabilization Notification form is completed for VR participants who require extended services. VR and CRP personnel work jointly to complete this document, which is subsequently provided to entities providing extended services, e.g., Bureau of Development Disability Services, at least 60 days prior to the anticipated transition date to extended services.

VR administration continues to focus on the need to ensure quality SE service; as such services are essential in securing quality employment outcomes for those participants with MSD. VR will continue to work closely with the Bureau of Disabilities Services, the Division of Mental Health and Addiction, and CRPs to identify areas of concern, implement needed changes in practices, and provide training and/or technical assistance.

CRPs who meet accreditation requirements as outlined in Indiana code, may register as VR employment service vendors. During this registration process, accreditation requirements are verified and the specific services the vendor will provide are identified. Vendors may request registration for the provision of Supported Employment services for individuals with the most significant disabilities and extended services for youth with the most significant disabilities. Once approved by BRS as meeting all criteria to be a registered vendor for these services, a vendor agreement is generated which outlines vendor requirements and responsibilities. Upon client informed choice of vendor selection and inclusion of SE and/or extended services on the IPE, the VR case management system will allow authorizations for SE and extended services to be issued only to vendors who are approved to provide these services through the vendor registration process.

BRS has also developed a written agreement with the IN Bureau of Disabilities Services, the state entity that manages several home and community based waivers, including for individuals with intellectual and developmental disabilities. The agreement outlines responsibilities for each program and areas of collaboration, including sustaining a process for the transition of individuals to BDS funded long term supports, as well as collaboration in the provision of training to BRS and BDS staff, providers and case managers on the transition process.

F. Annual Estimates

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

1. *Estimates for next Federal fiscal year-*
   A. *VR Program; and*

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
N/A	14,000	14,000	$43,600,000	N/A

   B. *Supported Employment Program.*

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
Category 1 MSD	1,950	1,950	$6,100,000	N/A

G. Order of Selection

☒ *The VR agency is not implementing an order of selection and all eligible individuals will be served.*

☐ *The VR agency is implementing an order of selection with one or more categories closed.*

*VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection

Pursuant to section 101(a)(5) of the Rehabilitation Act, this description must be amended when the VR agency determines, based on the annual estimates described in description (f), that VR services cannot be provided to all eligible individuals with disabilities in the State who apply for and are determined eligible for services.

1. *For VR agencies that have defined priority categories describe-*
    A. *The justification for the order;*

Indiana began operating under an order of selection August 1, 2017 due to a deficit of staffing and fiscal resources, as approved by RSA through a State Plan amendment. Priority category 1 remained open, while priority categories 2 and 3 were closed from August 2017 through early July 2023. Priority category 2 opened July 5, 2023, and priority category 3 opened October 7, 2024, thus ending the Order of Selection in October 2024. Subsequently, a State Plan Amendment was submitted to modify the order of selection to 'not implementing an order of selection.'

IN VR is not currently operating under an order of selection as of this state plan update submission.

B. *The order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensuring that individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and*

BRS continues to assess level of severity for eligible individuals to determine assigned priority category. Priority categories are as follows:

• Priority Category 1: Individuals determined to have a most significant disability (MSD);
• Priority Category 2: Individuals determined to have a significant disability (SD); and,
• Priority Category 3: All other eligible individuals (Individuals determined to have a non-significant disability (NSD)).

MSD: An individual who has a severe physical or mental impairment that seriously limits three or more functional capacities (communication, interpersonal skills, mobility, self-care, self-direction, work skills, or work tolerance) in terms of an employment outcome, requires multiple vocational

rehabilitation services over an extended period of time, and has one or more physical or mental disabilities determined to cause comparable substantial functional limitation.

SD: An individual who has a severe physical or mental impairment that seriously limits one or more functional capacities (communication, interpersonal skills, mobility, self-care, self-direction, work skills, or work tolerance) in terms of an employment outcome and whose vocational rehabilitation can be expected to require multiple vocational rehabilitation services over an extended period of time.

NSD: All other VR eligible individuals.

C. *The VR agency's goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR agency will manage waiting lists, and the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.*

All priority categories were open as of October 2024. There are no closed categories and no individuals on waiting lists as of this State Plan update submission.

2. *Has the VR agency elected to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment?*

☐ Yes
☒ No

H. Waiver of Statewideness

The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with Section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 C.F.R. § 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."

BRS has entered into an interagency cash transfer agreement (ICTA) with Hamilton county, through services to groups, to provide technical assistance to businesses. BRS seeks to expand this pilot to other geographic areas of Indiana, and as such, conducted a request for proposal (RFP) process in last CY25 with plans to award contracts by Fall, 2026. To be eligible to bid on the RFP, respondents must be local public agencies and must commit to providing non-federal match funds to BRS. Awarded contractors will not carry out direct participant services, but rather serve as a bridge to support BRS in gaining increased and more streamlined access to a network of businesses who can host participants for activities such as informational interviews and work experiences, as well as hiring opportunities for qualified individuals with disabilities. Contracts will outline the non-Federal share of the cost and required funds provided by the local public agency, and outline how services promote improved employment opportunities for job seekers with disabilities through the VR business networks established through these partnerships. Contracts will also serve as written assurance that the local public entity will make available to BRS the non-Federal share of funds. The terms of the contract will also specify that BRS approval will be obtained for each proposed service before it is put into effect; and that all other requirements of the vocational rehabilitation services portion of the Unified or Combined State Plan, including a State's order of selection requirements if an order is in effect, will apply.

Through these ICTA's, businesses will receive training and technical assistance to support recruitment and hiring of qualified job seekers with disabilities, while IN VR participants gain structured and streamlined access to a network of VR business partners for purposes of gaining work experience, informational interviews with industry professionals, and hiring opportunities. While specific regions are TBD based on results of the RFP, BRS does not anticipate that these technical assistance to business ICTA's will be available statewide. VR will continue to offer technical assistance to businesses as capacity allows on a statewide basis, however it will be more robust and comprehensive in these pilot areas due to the ICTA local partnerships and associated funds. VR participants will continue to have access to work experiences, access to industry professionals to support career exploration activities, e.g., information interviews, and access to hiring opportunities statewide, however there will be enhanced access in these pilot areas as BRS gains a wider array of business partners in these geographic areas.

I. Comprehensive System of Personnel Department

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. *Analysis of current personnel and projected personnel needs including-*

A. The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients;

B. The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category; and

C. Projections of the number of personnel, broken down by personnel category, who will be needed by the VR agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

A. The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients

There are currently 344 positions in BRS, further detailed in the table under 1C below by type of position. As of January 2026, the average Caseload Counselor to participant ratio is approximately 1:77, however in some areas of the state, caseloads are as high as 95, and most office Supervisors are also carrying caseloads at this time. Additionally, the large majority of these cases are individuals with most significant disabilities (81%).

B. The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category

See table under item C below

C. Projections of the number of personnel, broken down by personnel category, who will be needed by the VR agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Vocational Rehabilitation Counselors	183	188	188
Working Lead VR Counselors	7	7	8
VR Youth Counselors	10	10	10
VR Area Supervisors	25	26	26
VR Region Managers	5	5	5

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
BRS Leadership/Admin	8	8	8
VR Case Coordinators	65	66	66
VR Area Secretaries	11	11	11
Blind/Deaf programs	8	8	8
Other Central Office	14	14	12
Business Engagement Staff	1	1	2
Total	337	344	344

D. *Ratio of Qualified VR counselors to clients;*

As of January 2026, the average Caseload Counselor to participant ratio is approximately 1:77.

E. *Projected number of individuals to be served in 5 years;*

VR projects an increase in the number of individuals served due to several factors, including the end to the order of selection in CY24, an increasing trend in the number of VR applicants (30% increase from PY20 to PY24), targeted outreach efforts to transition aged youth, and special projects such as BRS' Disability Innovation Fund SE+ grant. BRS projects serving approximately 16,000 individuals annually by PY28.

2. *Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:*
   A. *A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.*

Indiana does not have any CACREP Accredited Rehabilitation master's programs in the state, and therefore there are 0 graduates to report. VR staff are encouraged to pursue online rehabilitation counselor preparation programs through out-of-state institutions which are CACREP-approved.

VR encourages students studying in related fields to participate in internships with the VR agency and believes this to be a valuable recruiting practice. VR will continue to work with local universities to increase the number of interns with hopes of increasing the recruitment pool for vacant VR Counselor positions.

Due to the lack of accredited rehabilitation graduate programs in Indiana and historic challenges in recruiting qualified candidates for VR Counselor positions, BRS modified its minimum educational requirements for VR Counselor positions after WIOA was passed. Current minimum qualifications include a bachelor's degree in rehabilitation or a related area along with at least one year of related experience. Prior to this significant change, the minimum requirement was a master's degree in Rehabilitation or related area.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
N/A	N/A	N/A	N/A

> B. The VR agency's plan for recruitment, preparation and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts between the VR agency and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

Over the last 10 years, BRS has implemented several recruitment, training and retention strategies, with great success as staffing retention has reduced significantly. Only 2.4% of VR Counselors positions are vacant as of January 2026 (5 positions). These strategies included a comprehensive restructuring of the field services staffing model, including the addition of the VR Case Coordinator role to ensure that the VR Counselor role is centered around rehabilitation counseling and guidance. Further restructuring included the addition of 7 working lead VR Counselors to help cover caseloads tied to vacant positions and mentor newly hired VR Counselors. Additionally, Indiana VR

redesigned the new VR Counselor training process and implemented numerous enhancements, such as expanding the training team, implementing a blend of on-line self-paced training, in-person small group training, and one-on-one mentoring at the local level. VR also uses the YES-LMS training platform which supports enhanced accessibility of training modules for all VR staff. Furthermore, VR streamlined communication to staff, developed a comprehensive but user-friendly business process manual and regular field chats with staff, and implemented formal and informal staff recognition opportunities.

VR recognizes the value of high quality training and professional development for VR staff, and as such, expanded from 1 training position to a 3-member training team. The team has improved and restructured training for new and seasoned VR staff, incorporating more engaging training strategies such as use of short videos and interactive activities, along with VR Counselor cohorts focused on building/improving vocational counseling and guidance skills. VR Counselor working leads and VR Area Supervisors are also important players in the training of new staff from a 'boots on the ground' level. Seasoned Counselors also provide training as a peer, such as providing opportunities for job shadowing.

All of these changes increased job satisfaction and created advancement opportunities, while some also improved efficiency and timeliness of eligibility determination and IPE development. An initial wage increase was implemented in 2019 for VR staff, with a second compensation adjustment in 2022. With these changes, staff retention improved substantially, with turnover less than 10% for VR Counselors during CY2025.

VR has a long-standing history of hiring qualified candidates from minority backgrounds as well as individuals with disabilities for all BRS positions, including VR Counselors, support staff, and management roles. A survey conducted by State Personnel in 2022 reflected that approximately 40% of BRS staff consider themselves to be an individual with a disability. VR Counselors also share openings as appropriate with VR participants and VR has hired several former participants into VR positions, including VR Counselor positions. VR has streamlined employee accommodation processes and provided training to all levels of management to improve understanding of the processes, to ensure accommodation needs are addressed timely and effectively across the state.

      C. *Description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:*

            i. *Particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and*

ii. *Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.*

i. Particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998.

VR continues to assess training methods and curriculum in order to make necessary improvements to the development and delivery of training for staff, specifically new VR Counselors. Counselor training needs are assessed through survey, dialogue, supervisor recommendations, staff feedback, and agency directives. VR has a dedicated statewide training director to oversee all training initiatives, obtaining ongoing feedback from a variety of staff to work toward continuous improvement in the development and delivery of training. In early 2022, the VR training team was expanded to also include a VR Training Assistant Director as well as a Training Coordinator, taking the team from 1 to 3 staff.

Training is provided through a variety of modalities, including regional trainings, webinars, and in-person workshops. VR is utilizing the YesLMS learning management system for web-based modules for new and seasoned VR staff. The training team has developed a series of new customized training courses for new and more seasoned Counselors and has utilized existing courses in the YesLMS training library to augment the customized training developed. For new Counselors, a training plan has been developed to include 10 weeks of training activities in addition to the YesLMS courses, including video tutorials on the case management system and other relevant topics.

In addition to formal classroom style or web-based training, a great deal of mentoring and coaching occurs at the local level, especially for new staff. Supervisors and Working Lead Counselors play a large role in coaching new staff and will continue to be a key part of new staff training. BRS established VR Counseling and Guidance Cohorts to focus on the essentials of counseling and guidance throughout the VR process. These are small groups of 5-10 newer (within two years of hire) VR staff who work with a skilled facilitator and other trainees through a series of sessions, under the supervision of a senior or management-level staff member who has a graduate degree in Rehabilitation or other counseling area, or is certified or licensed as a counselor.

VR also accesses training and resources offered by partners, including the statewide Assistive Technology IN-DATA program which offers 'first Friday' AT webinars specifically for VR staff as well as trainings developed by the former VRTAC-QE, VRTAC-QM, and the Center for Innovative Training in VR (CIT-VR).

ii. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.

State and national subject matter experts are frequently invited to present to VR staff through Friday field chats, webinars, and other training modes. Example topic areas have included Adult Education programs, labor market information, postsecondary services and collaboration opportunities, disability specific content, and more. A weekly communications 'Blast' is also distributed to all staff to provide timely information and helpful resources. Furthermore, VR meets regularly with staff through biweekly leadership team meetings which include VR region managers and the training team, quarterly supervisor meetings, and quarterly regional meetings with all VR field staff. These meetings have proven to be a great method of information sharing, opportunities to solicit feedback, clarification of procedures and practices, and insight into areas of concern. In 2025, VR introduced mission control one-to-two page briefings to highlight important information about VR services delivery practices.

The VR training team worked directly with the Indiana Department of Workforce Development (DWD) in developing training material using the YesLMS platform to educate VR and DWD field on WIOA program involvement. This included development of three courses to be completed by both VR and DWD staff on collaboration and coordination between workforce programs, VR, and Adult Education.

3.   *Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including-*
     A.   *Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and*
     B.   *The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.*

A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services.

While Indiana BRS does not require any specific certification, licensing, or registration for staff, there are currently 17 VR staff who hold a CRC. As there are no CACREP accredited rehabilitation programs in Indiana, BRS modified the minimum VR Counselor qualifications to ensure a sufficient talent pipeline to fill VR Counselor positions. Those minimum qualifications are detailed below under item B of this section of the state plan. As many VR Counselors do not come to BRS with a

Rehabilitation degree, BRS has built a robust training process to ensure that new VR Counselor training fills any education gaps. Those training requirements are outlined throughout this section of the state plan.

B. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

Current VR Counselor qualifications are as follows:

Master's degree from an accredited university in rehabilitation counseling, rehabilitation administration, counseling and guidance, social work, special education, sociology, audiology, education, speech pathology, or a closely related human service area or certification as a Certified Rehabilitation Counselor (CRC) is preferred;

OR

In lieu of a master's degree, a bachelor's degree from an accredited university in rehabilitation counseling, rehabilitation administration, counseling and guidance, social work, special education, sociology, psychology, audiology, education, speech pathology, or a closely related human service area or certification as a Certified Rehabilitation Counselor (CRC); AND

Demonstrated paid or unpaid experience, for not less than (1) one year, consisting of:

- Direct work with individuals with disabilities in a setting such as an independent living center;
- Direct service or advocacy activities that provide such individual with experience and skills in working with individuals with disabilities; or
- Direct experience as an employer, as a small business owner or operator, or in self-employment, or other experience in human resources, recruitment, or experience in supervising employees, training, or other activities that provide experience in competitive integrated employment environments.

Other preferred experience includes:

- Vocational counseling skills, motivational interviewing skills, or related counseling skills.
- Awareness of medical and psychological aspects of disability, counseling theories, assessment tools, job development and placement, Rehabilitation Act, ADA, IDEA, Social Security, Medicaid, Medicare, other state/federal programs, DWD programs, rehabilitation technology, economic and labor market trends, community organizations, and financial aid.
- Excellent oral and written communication skills, creativity, problem-solving, evaluation of services, and time management skills.
- Ability to communicate with diverse populations, flexibility, handling multiple tasks, maintaining professional demeanor, and ability to empathize.
- Ability to interpret psychological/medical evaluation reports and medical terminology.

- Familiarity with Assistive Technology and how to access AT services.
- Knowledge of local community and statewide resources preferred.
- Knowledge of local and statewide job market preferred.

Since there are no accredited rehabilitation education programs in the state, BRS identified a need to modify VR Counselor minimum qualifications as outlined above to ensure a sufficient pipeline of qualified applicants. To sustain a high-quality VR Counselor workforce, the training process for new Counselors has also been enhanced, along with continuing education requirements for all VR Counselors, to ensure staff stay up to date on the evolving needs of individuals with disabilities. Individuals hired as VR Counselors that do not have a master's degree in Rehabilitation Counseling or CRC must complete a robust training process, with oversight by the VR Training Team and the local Supervisor. These staff enter as VR Counselor Trainees and perform their work under the supervision of the VR area supervisor or VR working lead Counselor until they have completed initial training and demonstrated the necessary progression in performance of VR Counselor responsibilities to promote to a VR Counselor. They are required to complete 42 clock hours of asynchronous online courses to include, but not limited to, medical and psychological aspects of disability; rehabilitation counseling theory, strategies and techniques; benefits counseling; and assistive technology. Trainees must demonstrate satisfactory completion of these training requirements and satisfactory performance prior to transitioning out of the VRC Trainee role and into the VR Counselor role. This is assessed by the Supervisor and reviewed with the Region Manager at around 8 months from the VR Counselor Trainees start date. The review can be extended for another 3-6 months if training requirements have not been met or satisfactory competency in performing their responsibilities has not been demonstrated.

In addition, VR Counselor Trainees must demonstrate satisfactory counseling and guidance skills through participation in a Counseling and Guidance Cohort, a small group in which Trainees put their newly acquired skills into practice using scenarios and role play exercises, during their first year of employment. The Counseling and Guidance Cohorts are conducted under the supervision of individuals who hold a graduate degree in Rehabilitation or other counseling area or is certified or licensed as a counselor.

Additionally, all VR Counselors, including seasoned staff, are required to complete a minimum of 12 clock hours annually for professional development activities as appropriate and approved by their supervisor.

Through the VR staffing structure outlined in this section including the designation of VR Counselor Trainee from VR Counselor and the designated VR Counselor Specialty roles, e.g., Intake/Eligibility Counselor v. Caseload Counselor; the robust initial training for Trainees; Counseling and Guidance Cohorts; and ongoing professional development for all VR Counselors and Supervisors, VR Counselors are qualified to perform their responsibilities, including non-delegable functions and the authorization and delivery of high quality vocational rehabilitation services. BRS VR Counselors are qualified personnel for purposes of the determinations that must be made in accordance with 34 CFR 361.42(a)(1)(i) and (ii), i.e., that the applicant has a physical or mental impairment, and that

the physical or mental impairment constitutes or results in a substantial impediment to employment. VR Counselor Trainees, who are not yet considered to meet the standards as qualified personnel, work under the direct supervision of qualified personnel who will review and approve all of their eligibility determinations.

Over the last three years, BRS has experienced success in recruiting qualified applicants, likely attributed to salary increases and other initiatives as described above, combined with the revised minimum qualifications also described above.

4. *Method(s) the VR agency uses to ensure that personnel are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.*

VR maintains the ability to communicate with VR participants in their preferred mode of communication in a variety of ways. VR staff access and coordinate foreign language translation, ASL communication, Communication Access Real Time (CART), or other communication accommodations whenever needed. To ensure communication services are available despite a shortage of some providers (i.e., ASL interpreters, CART providers), VR has increased utilization of remote interpreting services.

VR Counselor Specialists provide expertise and support for specific populations, including individuals who are deaf or hard of hearing, individuals with low vision, and individuals with a traumatic brain injury. VR seeks candidates with some fluency in ASL for Counselor positions supporting participants who are Deaf. The BRS Aware (VR case management system) team has also expanded their understanding of the use of screen readers with JAWS and have provided additional training to VR staff who use screen readers. Accessibility was also a key consideration in identifying a learning management system to improve delivery of web-based training, and as mentioned, BRS began using YESLMS to allow us to further improve accessibility for staff.

VR also accesses language translation services whenever needed for communication with participants who are non-English speaking. Publications and brochures are available in large print, Spanish and Burmese versions.

5. *As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.*

VR has a Director of Youth Services on staff to train and notify VR field staff of best practices, changes and initiatives related to working with transition-aged youth. The Director of Youth Services also collaborates with other agencies, such as Department of Education (IDOE) and DWD, to conduct joint training and develop/distribute training materials and other resources. Partners such

as the Indiana University Institute on Disability and Community, and Public Consulting Group (PCG) serve as a transition resource to VR and/or IDOE and develop and maintain a variety of resources in this area. The Transition Advisory Council serves as an advisory group pertaining to statewide VR transition initiatives, including Pre-ETS and is expanding its scope to serve as the Employment for Youth Advisory Committee to facilitate education and resource sharing based on a needs assessment conducted by BRS and a pre-ETS authorized activities contractor. In addition to VR, partners who sit on this group include parent advocates, youth with disabilities, IDOE, DWD, local schools, IIDC, VR providers including Pre-ETS providers, Department of Corrections, the Division of Mental Health and Addiction (DMHA), and others.

In 2023, VR revisited practices and written guidance around transition services. As a result, training was provided to VR staff on improving collaboration with partners around transition, including expectations around the referral process and VR presence in schools through annual meetings, case conferences and transition fairs. This training was designed to increase the number of students applying for VR services, including students receiving Pre-ETS. Additionally, material was developed and distributed to all Indiana high schools that describes Pre-ETS activities, how to refer a student to VR and how to reach VR to request attendance by VR at a case conference, transition fair or other meetings or events. While many practices were already in place around the state, the updated guidance and information sharing promoted improved transparency for schools and more consistent transition practices statewide.

COOPERATION, COLLABORATION, AND COORDINATION (Section 101(a)(11) of the Rehabilitation Act)

J. Coordination with Education Officials

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act-

1. *Describe plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities, that are designed to facilitate the transition of the students with disabilities from the receipt of educational services in school to the receipt of vocational rehabilitation services, including pre-employment transition services.*

Student with a disability definition: includes students in secondary school between the ages of 14 through the school year in which the student becomes 22, who is eligible for, and receiving, special education or related services under Part B of the Individuals with Disabilities Education Act, is an individual with a disability for purposes of Section 504 of the Rehabilitation Act, or is otherwise a student with a documented disability. Pre-employment transition services may be provided to students who are applicants of or eligible for the Vocational Rehabilitation (VR) program (participants) and students with disabilities who may be potentially eligible for the VR program.

A student aged 14 to 22 years old in the following categories is considered "potentially eligible" for the provision of VR Services, regardless of whether the student has applied for or has been determined eligible for VR services if the student:

1. Receives special education services pursuant to 511 IAC 7;
2. Receives accommodations pursuant to a Section 504 plan;
3. Is a student who is an individual with a disability, for purposes of Section 504; or
4. Is a student with a documented disability.

Indiana VR and the Indiana Department of Education (IDOE) continue to collaborate to ensure streamlined transition services for students with disabilities, consistent with the Workforce Innovation and Opportunity Act (WIOA) and the Memorandum of Understanding (MOU) between the agencies. The shared goal is to facilitate the movement of students with disabilities from secondary education into post-secondary training and competitive, integrated employment, supported by VR services, including pre-employment transition services (Pre-ETS). The MOU establishes common principles, responsibilities, and procedures for serving students ages 14–22 with disabilities as defined above, and both agencies will continue to prioritize vocational options that lead to competitive, integrated employment, economic self-sufficiency, and career growth. Coordination emphasizes individualized vocational goals, structured service delivery, and integration of planning documents such as IEPs, 504 Plans, and Individualized Plans for Employment to avoid duplication and ensure consistency.

VR maintains Pre-ETS availability in all 92 counties and collaborates with approximately 400 schools statewide. Beginning in 2026, Pre-ETS activities will be tied directly to individualized vocational goals with the Student Career Profile serving as a living document to capture growth and align with school transition planning. Career Coaches will continue to deliver services in collaboration with schools, and schools will remain key partners in identifying students and coordinating services.

Ten VR Youth Counselors provide regional leadership, technical assistance, and oversight of Pre-ETS and transition services. Counselors complete twice yearly coverage area updates, documenting school coverage, student participation, quality improvement initiatives, training, and outcomes. These plans highlight strengths and challenges in provider relationships, referral practices, and student engagement, and guide targeted training and technical assistance. Counselors also participate in local transition councils, cadre meetings, and statewide advisory groups to ensure alignment and responsiveness. This system of planning and oversight allows VR to continually improve processes, procedures, and outreach to students and youth with disabilities.

The Statewide Transition Advisory Council will continue to serve as the MOU oversight body and guide transition and Pre-ETS implementation. In 2025, the Council concentrated on preparing for the Pre-ETS service delivery improvements, including development and implementation of a Student Career Profile. Members reviewed draft resources, discussed strategies to ensure students exit Pre-ETS with a vocational goal, and received updates on IDOE's new diploma structure, the statewide IEP system, and technology enhancements like the Pre-ETS Consumer Portal to

streamline student referrals to Pre-ETS. Collaborative initiatives such as micro-credentialing pilots in Early Childhood Education and Auto Mechanics, with Culinary Arts planned for 2026, were also highlighted. The Council will continue to align efforts across agencies, address barriers, and ensure families receive timely information to improve transition outcomes for students with disabilities.

VR will continue to actively support referrals from Pre-ETS to VR, while also enhancing the existing system through collaborative planning with schools and other relevant stakeholders. A key focus is ensuring that all students with disabilities have access to meaningful Pre-ETS activities, coordinated transition services, and a seamless pathway to VR services when appropriate. This approach reflects Indiana's commitment to sustainability, clarity, and equitable access, while maintaining strong partnerships with IDOE and other stakeholders to prepare students with disabilities for success after high school.

2. *Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 C.F.R. § 361.22(b), provide, at a minimum, the following information about the agreement:*
   A. *Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services;*
   B. *Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under Section 614(d) of the Individuals with Disabilities Education Act;*
   C. *The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services;*
   D. *Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements,*

> *application procedures, and scope of services that may be provided to eligible individuals;*
>
> E. *Coordination necessary to satisfy documentation requirements set forth in 34 C.F.R. part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and*
>
> F. *Assurance that, in accordance with 34 C.F.R. § 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 C.F.R. § 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.*

A. Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services.

The BRS/IDOE MOU includes the following information:

1. DDARS will provide consultation and technical assistance to the IIDOE staff in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services.

2. Consultation and technical assistance will be provided by the administrative, supervisory, and direct service delivery levels of DDARS and will occur formally and informally throughout the school year.

3. DDARS staff will be responsible for providing consultation and technical assistance to IIDOE special education and transition personnel at the district and school levels, to assist IIDOE transition teachers and staff in planning for transition activities. Areas of consultation and technical assistance may include information related to:

a. DDARS service description including pre-employment transition services

b. DDARS eligibility criteria

c. Assistive technology needs and assessments

d. Social Security benefits planning

e. DDARS referral procedures

f. Career exploration

g. Local resources for transition in addition to DDARS

h. Federal financial aid available for post-secondary education

4. DDARS is available to provide consultation and technical assistance to IIDOE as needed throughout the year. IIDOE may request consultation and technical assistance by phone, video conferencing, e-mail, mail, or on a peer-to-peer basis. DDARS and IIDOE agree to provide cross-training as needed.

B. Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under section 614(d) of the Individuals with Disabilities Education Act

1. DDARS will attend meetings to facilitate transition planning, such as meetings for the development of an Individualized Education Plan (IEP) and/or Individualized Transition Plan (ITP) when invited and with sufficient notice, with appropriate consent, and as resources allow.

2. DDARS will make available to IIDOE and LEA's, informational resources, such as the "Moving On...Life After High School" VR transition planning booklet, that LEA's are encouraged to distribute) to family members, and or guardians and their representatives at all IEP meetings as part of the routine information shared.

3. DDARS, in collaboration with LEAs and local providers, will provide or arrange for the provision of pre-employment transition services to all students with disabilities identified as requiring these services.

4. DDARS shall determine the eligibility of all students with disabilities who have applied for VR services within 60 days from the date of application pursuant to section 102(a)(6) of the Rehabilitation Act and section 34 CFR 361.41(b)(1) of its implementing regulations.

5. DDARS will develop an Individualized Plan for Employment (IPE), which is consistent with, and which takes into consideration the student -participant's IEP, within 90 days of VR eligibility, unless an extension is approved.

C. The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services

The responsibilities of DDARS are to serve as the lead agency in Indiana for carrying out Federal and State policies relating to the program under the Rehabilitation Act, including the following:

1. Accept referral of students with disabilities during the transition planning process for the provision of pre-employment transition services.

2. Provide consultation with school district staff on transition planning to prepare a student to move from school to work or post-secondary education in accordance with the student's unique needs as determined through the IEP process and provision of pre-employment transition services.

3. Assess, plan, develop and provide VR services for eligible individuals with disabilities who have been referred for VR services, consistent with their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice, so that such individuals may prepare for and engage in competitive, integrated employment.

4. Develop an Individualized Plan for Employment (IPE), which is consistent with and which takes into consideration the student-participant's Individualized Education Plan (IEP), within 90 days of DDARS eligibility determination, unless an extension is approved.

5. Provide consultation to assist in the identification of eligible and potentially eligible students with disabilities and assessment of their individual needs for pre-employment transition services.

6. Provide or arrange for the provision of services required by the IPE goal, when the student has been determined eligible for VR and the services are specific to his/her employment outcome and are not services customarily provided to the student by the LEA under the Individuals with Disabilities Education Act (IDEA).

7. Provide information to parents and/or guardian(s), student-participants regarding VR eligibility, vocational assessment for employment and post-secondary planning and the Client Assistance Program (CAP).

8. Obtain written consent for the release of confidential information, pursuant to DDARS policy and procedures, federal and state laws and regulations regarding confidentiality.

9. Provide contact information for DDARS counselors, and information related to the VR process for coordination of transition activities within each school district.

10. Share information regarding policies, procedures, guidelines, programs and services for the purpose of improving access to, and availability of, transition services.

11. Provide informational materials about the VR process and services to the school districts for distribution to the students, parents, legal guardians, teachers and others.

12. Promote employer participation in providing opportunities for work-based learning for students with disabilities.

13. As new federal or state requirements or initiatives are identified, DDARS will participate with IDOE on joint training of school district and VR staff whenever possible and as applicable.

14. Inform teachers, IDOE, students, legal guardians and parents of the mandates found in the Rehabilitation Act and its implementing regulations, which require the student with a disability exiting school to be referred to DDARS prior to entering subminimum wage work with a 14c certificate holder.

The responsibilities of IDOE are as follows:

1. To provide technical assistance, training and reference materials regarding WIOA to school districts and other stakeholders identified by IDOE, including parents, families, guardians and students relating to the provision of pre-employment transition services and other transition services. Additionally, IDOE will disseminate this information to all appropriate IDOE staff who work with or make decisions about Special Education Services and ensure knowledge of joint responsibilities.

2. To facilitate and coordinate the smooth transition of students with disabilities from school to post-school employment-related activities, including the receipt of appropriate pre-employment transition services, transition services, technical education and competitive, integrated employment.

3. To encourage school district and DDARS collaboration and coordination for the purpose of providing more opportunities and resources to move students from school to work (e.g., participation on local multi-agency teams, Career and Technical Education (CTE) and other opportunities for collaboration for improved pre-employment transition outcomes).

4. To encourage liaisons between the school districts or individual schools and local DDARS offices, to ensure the provision of relevant disability documentation, and/or copy of the IEP/504 for students referred with documented consent, as applicable.

5. To develop active communication and outreach efforts to make parents and students aware of coordinated transition services and opportunities. Examples are participation in the annual transition conference, career fairs, summer camps, and other vocational/educational opportunities.

6. To facilitate joint training between DDARS and appropriate school district personnel on new State or Federal requirements or initiatives that impact the provision of services by both entities, as applicable.

7. See section V, Coordination of Effort, for specifics on subminimum wage work environments and documentation requirements.

The student's Transition IEP will define the services and responsible payer for each of the services in accordance with 34 CFR 300.320(b). If DDARS/BRS/VR services is responsible for payment of a service, this responsibility will be described in the IPE in accordance with 34 CFR 361.45.

1. Each Partner Agency will maximize coordination in the use of federal funds.

2. Decisions related to which entity will be financially responsible for providing transition or Pre-ETS that can be considered both a special education and a VR service must be made at the local level as part of the collaboration between the VR agency, state educational agency, and the local educational agency. When considering and assigning the financial responsibility of each agency for the provision of transition and pre-employment transition

services to students with disabilities, the Partner Agencies decision will be based, at least in part, on the following criteria:

    a. Is the purpose of the service related to an employment outcome or education?

    b. ls the service one that the school customarily provides under IDEA, part B?

    c. ls the student receiving special education services 14 years or older or has entered grade 9?

D. Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals

1. Annually, DDARS, or qualified vendors, will work with LEAs so they may identify students with disabilities and potentially eligible students who need pre-employment transition services (Pre-ETS).

2. The LEA's will work to increase identification of students with disabilities, such as through conducting career fairs or planning meetings and inviting DDARS to parents' nights. Schools will refer students with disabilities for purposes of 504 or at the time the individual begins IDEA services.

3. Anyone (an LEA, nurse, parent or student self-referral) can refer students for Pre-ETS and DDARS will work with the LEA to ensure seamless collaboration between transition services provided under IDEA and the Pre-ETS activities.

4. Annually, DDARS will provide written information regarding the availability of Pre-ETS for eligible and potentially eligible students with disabilities and the process for accessing these services.

5. Not all eligible or potentially eligible students with disabilities will require all five required Pre-ETS activities, however, all required Pre-ETS activities will be available statewide and delivered based on individual student need.

E. Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment.

As identified in 34 CFR Part 397.30, IIDOE shall ensure LEAs document completion or refusal of transition services and provide the documentation to DDARS by the prescribed intervals. Upon transmittal of the final documentation, IIDOE shall provide a "cover sheet" to DDARS itemizing the documentation that has been provided to DDARS regarding the youth. IIDOE must retain copies of the documentation in a manner consistent with the requirements of 2 CFR 200.333.

F. Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.

Neither IDOE nor the LEA will enter into an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at a subminimum wage.

K. Coordination with Employers

In accordance with the requirements in Section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

The VR Business and Community Engagement (BC&E) team builds relationships with employers to share information and resources that support competitive integrated employment for individuals with disabilities. The team continues to explore strategies to expand its capacity for business engagement to better connect job seekers with disabilities to employers and to assist employers in meeting their workforce needs. Employers often seek resources related to disability hiring in the form of informative and educational presentations to executive management, supervisors, and HR teams. Resources requested include information on recruiting, hiring, and retaining individuals with disabilities; ensuring that workplace practices and environments are accessible; and understanding available supports.

Informational panel presentations during March Disability Awareness Month and October's Disability Employment Awareness Month, sponsored by business networking organizations such as SHRM and Chambers of Commerce, are often the first point of contact in reaching employers and have resulted in requests for more information. Employers have requested specific presentations and trainings on topics such as disability etiquette and awareness for hiring managers, information on tax credits, accommodations, and opportunities to network directly with job seekers. In the past two years, the Indianapolis Area Work to Include coalition launched a monthly Employer Showcase that brings employers, job seekers with disabilities, and employment service providers together to network and share information. Similar coalitions around the state host these types of activities, resulting in long-term connections for job seekers with disabilities.

As part of employer engagement, information on how employers can engage youth is often requested due to the potential pipeline of talent it creates. Employers are receptive to providing opportunities to transition-age youth such as employer tours, informational interviews, and

interview preparation. Some employers have also begun offering video tours and live virtual tours as an option to increase outreach activities for youth and the general population.

Additionally, VR youth counselors engage with employers at the local level to provide work-based learning activities, including work site tours, job shadowing, and work experiences.

In addition to direct employer engagement activities, VR is expanding technical assistance to businesses through interagency cash transfer agreements (ICTAs) with local public entities who have established business networks, e.g., cities and counties who work closely with local Chambers or other business networks. These agreements, piloted in Hamilton County and planned for expansion through a statewide RFP process, provide technical assistance to businesses and serve as a bridge to connect VR with a broader network of employers. This structure enhances opportunities for informational interviews, work experiences, and hiring pathways for individuals with disabilities. By leveraging ICTAs, VR strengthens its employer coordination efforts, ensuring that businesses receive training and support in disability recruitment and retention, while participants gain more streamlined access to competitive integrated employment opportunities.

Additionally, VR's BC&E Director has provided consultation to VR participants on an individualized basis to support unique or challenging cases, such as connecting a participant with a work experience to obtain the required number of training hours needed to be qualified for employment aligned with her vocational goal. This VR team member also worked individually with a participant who had not experienced success through employment service providers and was able to connect him to several opportunities.

L. Interagency Cooperation with Other Agencies

In accordance with the requirements in Section 101(a)(11)(C) and (K), describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

> *1. State programs (designate lead agency(ies) and implementing entity(ies)) carried out under Section 4 of the Assistive Technology Act of 1998;*

BRS is the grantee for the federally funded Assistive Technology grant. VR has a long-standing partnership with Easter Seals Crossroads Assistive Technology Center INDATA Project. The INDATA Project is federally funded through the Assistive Technology Grant and is designed to increase access to and awareness of assistive technology. INDATA's core services include: information and referral, funding assistance, public awareness and education, device demonstration, device loan, reutilized computers, and equipment reutilization. The INDATA Project is an international benchmark of success. The INDATA Project helped transform the Easter Seals Crossroads AT Center into more than just what the federal act requires. Now the AT Center has its own recording

studio and broadcasts 24/7 podcasts around the world. They are known for their expertise and ability to train their staff in order to prepare each member for their national RESNA certification as an AT Provider. In addition, the INDATA Project staff provides VR Counselors ongoing assistive technology training and monthly webinars that are live streamed to VR staff. Furthermore, participants and VR staff can access the equipment loan library to test various types of equipment or borrow equipment to be used when repairs are necessary to previously purchased items. INDATA Project also partners with Centers for Independent Living, Area Agencies on Aging and Community Rehabilitation Programs (CRP) ensuring broad networking reach for persons with disabilities to understand what services are available and how they can best be utilized to assist with employment and independent living.

2. Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture;

VR participants utilize the Indiana AgrAbility/Breaking New Ground Outreach Program located at Purdue University. This program assists farmers with disabilities to assess barriers and the need for accommodations and identify possible resources. Breaking New Ground provides outreach to rural communities across a spectrum of disabilities including spinal injuries, amputations, arthritis, back impairments and behavioral health; making referrals to Indiana VR as appropriate. AgrAbility serves as a VR vendor to support farm modifications for VR participants.

3. Non-educational agencies serving out-of-school youth;

BRS continues to be a collaborative partner with DWD for services to all individuals with disabilities, including out-of-school youth. Additionally, VR continues to support long-standing Project SEARCH sites for students, as well as a young adult Project Search site with Cook Medical and Ivy Tech as host businesses. This site is unique in that it provides paid internship opportunities for participants.

4. State use contracting programs;

BRS has assigned a designee to represent DDARS/VR on the Indiana State Use Committee, also known as the Ability Indiana Committee. The Committee continues to meet quarterly to review services, products, and employment data while monitoring new initiatives by providers. The Indiana Association of Rehabilitation Facilities (INARF) manages the program and acts in a liaison capacity to facilitate contracts with Certified Ability Indiana Organizations and the Indiana Department of Administration. VR evaluates employment outcomes for VR participants engaged in Ability Indiana to assess whether they meet requirements for competitive, integrated employment. This is done on an individualized basis.

5. *State agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);*

VR has provided education and outreach regarding Indiana's Medicaid buy-in program (called M.E.D. Works) to support increased access to competitive, integrated employment for individuals with disabilities receiving Medicaid. Through VR benefit and work incentive counseling services, VR participants also receive information about M.E.D. Works and how this program can enable them to both work and maintain their needed Medicaid benefits. These benefit and work incentive counseling VR services also educate VR participants to support informed choices about working, providing education not only about the impact on Medicaid, but also the impact on other federal and state benefits, and the use of federal and state work incentives to assist in maximizing their employment opportunities. In 2021, VR, OMPP and Division of Mental Health and Addiction (DMHA) jointly conducted a funding gap analysis related to the delivery of Individual Placement and Support (IPS) and provided guidance to CMHC IPS early adopters on billable activities across the VR and Medicaid funding streams. Additionally, VR continues to collaborate with the Bureau of Disabilities Services (BDS) to identify opportunities for braiding and sequencing of services across BDS and VR programs, such as through Home and Community Based Waiver services. As an example, strategies for sequencing benefits and work incentive counseling supports through Waiver services before entering VR to support informed choice decisions about working, VR provided services during a participants' case to provide more comprehensive benefits planning and leveraging waiver or WIPA support after exiting VR to support sustained employment.

6. *State agency responsible for providing services for individuals with developmental disabilities;*

BRS and the Bureau of Disabilities Services (BDS) are housed in the same division, the Division of Disability, Aging and Rehabilitative Services (DDARS). Additionally, VR and BDS field offices are co-located, allowing for increased collaboration in serving mutual participants, educating referrals about each program's services and ensuring a smooth transition to extended services prior to exit from VR.

Many BDS and BRS current projects and initiatives are well aligned, including progress toward transitioning individuals from subminimum wage to competitive integrated employment, such as through BRS' Disability Innovation Fund project and BDS Waiver Redesign and System Transformation efforts. BDS has established a goal of a 15% increase in CIE outcomes for BDS participants by 2027. BRS and BDS collaboration is also threaded throughout the VR goals and priorities section, including exploration of opportunities for streamlined processes for serving mutual participants. Additional information about VR and BDS collaboration is detailed throughout the VR section of this state plan.

A representative from BDS has served on the VR Council since FFY18. BRS Leadership also presents quarterly to the DDARS Advisory Council and actively serves on several workgroups.

7. *State agency responsible for providing mental health services;*

VR enhanced its partnership with the Division of Mental Health and Addiction (DMHA) in 2019 through co-leading a workgroup aimed at improving employment services and outcomes to individuals with mental health disabilities. DMHA and VR also jointly submitted and were subsequently awarded several rounds of training and technical assistance through Department of Labor initiatives, including the Visionary Opportunities to Increase Competitive Employment (VOICE), and Advancing State Policy Integration for Recovery and Employment (ASPIRE) projects.

In partnership with DMHA, BRS is supporting four early adopter Individual Placement and Support (IPS) Community Mental Health Center (CMHC) sites, with intent to increase the number of IPS early adopter sites in the coming years. BRS, DMHA and OMPP jointly developed a funding guidance document to outline allowable braiding and sequencing of VR and MRO funds for IPS sites. Early adopter sites report that the IPS program is financially solvent due to the ability to braid and sequence these different funding sources. Additionally, BRS and DMHA have developed and maintained a written agreement outlining each agencies responsibilities in supporting the early adopter IPS sites.

Ten of the 24 community mental health centers across the state are registered employment service providers with VR for the provision of employment services including supported employment. VR Leadership has frequently been invited to present to CMHCs around the state to provide updates on VR initiatives and address questions and concerns.

8. *Other Federal, State, and local agencies and programs outside the workforce development system.*

The Bureau of Rehabilitation Services (BRS) is the designated state entity for the Independent Living Program. BRS maintains a dedicated staff member as liaison to CILs and providers of services for independent living for older individuals who are blind (OIB program). BRS leadership and CIL Directors began quarterly meetings in 2019 to improve collaboration. This included increasing BRS knowledge of the local efforts of CILS and increasing awareness of CILs of BRS initiatives. These regular meetings have resulted in updates to contract metrics for CILs to address concerns expressed by CILs, and introduction of CILS to the LifeCourse Framework. VR makes it a priority to support the network of CILs in Indiana by providing additional funding with the use of SSA program income to support center operations in the provision of services to assist individuals with disabilities with increased independence and improved access to their communities. BRS leadership also meets regularly with Indiana Statewide Independent Living Council (INSILC) officers and attends public meetings. This increased collaboration has resulted in contract changes and improved communication.

BRS will continue to identify collaboration opportunities with the Governor's Council for People with Disabilities (GCPD), including partnering on activities during Disability Employment Awareness

month, and GCPD representation on the VR Council. The GCPD executive director has also provided feedback on specific VR initiatives, such as the SE+ Disability Innovation Fund project, particularly pertaining to peer support services.

9. *Other private nonprofit organizations.*

VR purchases an array of services from a variety of vendors who complete the vendor registration process and meet criteria to provide services. VR maintains agreements in the registration system with each vendor. There are approximately 85 employment service providers, including Rehabilitation services facilities and Community Mental Health Centers who are registered vendors with BRS, and hundreds of other vendors such as medical providers, training institutions, evaluators, rehabilitation technology providers, independent contractors, and a variety of other organizations. VR promotes participant informed choice in the selection of services and service providers. BRS modernized it's provider directory to an online format to enhance the process for VR participants in making an informed choice in the selection of an employment service provider, while easing administration around timely updates to the directory. VR is also contracting with a vendor recruiter to help identify and onboard new vendors to fill service gaps across the state.

Vocational Rehabilitation Certifications

	States must provide written and signed certifications that:	
1.	The **Bureau of Rehabilitation Services** is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by title IV of WIOA, and its State Plan supplement under title VI of the Rehabilitation Act;	Yes
2.	In the event the designated State agency is not primarily concerned with vocational and other rehabilitation of individuals with disabilities, the designated State agency must include a designated State unit for the VR program (Section 101(a)(2)(B)(ii) of the Rehabilitation Act). As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the **Division of Disability and Rehabilitative Services** agrees to operate and is responsible for the administration of the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, 34 CFR 361.13(b) and (c), and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available to States under section 111(a) of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;	Yes
3.	As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency, or the designated State unit when the designated State agency has a designated State unit, agrees to operate and is responsible for the	Yes

	administration of the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;	
4.	The designated State unit or, if not applicable, the designated State agency has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement and is responsible for the administration of the VR program in accordance with 34 CFR 361.13(b) and (c);	Yes
5.	The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.	Yes
6.	All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.	Yes
7.	The **Theresa Koleszar, MS, CRC** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;	Yes
8.	The **Director, Bureau of Rehabilitation Services** has the authority to submit the VR services portion of the Unified or Combined	Yes

	State Plan and the supplement for Supported Employment services;	
9.	The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement.	Yes

Vocational Rehabilitation Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner, that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances:

	The State Plan must include assurances that:	
1.	**Public Comment on Policies and Procedures:** The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.	Yes
2.	**Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement**: The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a Unified State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.	Yes
3.	**Administration of the VR services portion of the Unified or Combined State Plan:** The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to: 　　a. the establishment of the designated State agency and	Yes

| | | designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.
b. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.
d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).
e. as applicable, the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.
f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.
h. the requirements for cooperation, collaboration, and coordination, as required | |
| | | | |

	by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.	
	i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act.	
	j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.	
	k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.	
	l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities as set forth in section 101(a)(18)(A).	
	m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.	
4.	Administration of the Provision of VR Services: The designated State agency, or designated State unit, as appropriate, assures that it will:	Yes

a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(E) and (20) of the Rehabilitation Act. b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act. c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act. d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act. e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act. f. comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act. g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act. h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the	

	Fair Labor Standards Act of 1938, as required by sections 101(a)(14) and 511 of the Rehabilitation Act. i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs. j. with respect to students with disabilities, the State. j.i. has developed and will implement, j.i.A. strategies to address the needs identified in the assessments; and j.i.B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113). j.iii. shall reserve not less than 15 percent of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.	
5.	**Program Administration for the Supported Employment Title VI Supplement to the State plan**: a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act. b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for	Yes

	individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.	
6.	**Financial Administration of the Supported Employment Program (Title VI):** a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(H) and (I) of the Rehabilitation Act. b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section	Yes

	606(b)(7)(A) and (D), of the Rehabilitation Act.	
7.	**Provision of Supported Employment Services:** a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act. b. The designated State agency assures that the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(7)(C) and € of the Rehabilitation Act.	Yes

Appendix 1: Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan. Include the state's expected levels of performance relating to the performance accountability indicators based on primary indicators of performance described in section 116(b)(2)(A) of the Workforce Innovation and Opportunity Act (WIOA).

	Title I- Adult Program			
	Program Year: 2026		Program Year: 2027	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	78.6%		78.6%	
Employment (Fourth Quarter After Exit)	78.4%		78.4%	
Median Earnings (Second Quarter After Exit)	$8,840		$8,840	
Credential Attainment Rate	72.1%		72.1%	
Measurable Skill Gains	82.8%		82.8%	

	Title I- Dislocated Worker Program			
	Program Year: 2026		Program Year: 2027	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	74.8%		74.8%	
Employment (Fourth Quarter After Exit)	76.6%		76.6%	
Median Earnings (Second Quarter After Exit)	$10,096		$10,096	
Credential Attainment Rate	70.7%		70.7%	
Measurable Skill Gains	76.9%		76.9%	

	Title I- Youth Program			
	Program Year: 2026		Program Year: 2027	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	78.5%		78.5%	
Employment (Fourth Quarter After Exit)	80.1%		80.1%	
Median Earnings (Second Quarter After Exit)	$4,980		$4,980	
Credential Attainment Rate	69.2%		69.2%	
Measurable Skill Gains	77.3%		77.3%	

	Title I- Youth Program			
	Program Year: 2026		Program Year: 2027	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	78.5%		78.5%	
Employment (Fourth Quarter After Exit)	80.1%		80.1%	
Median Earnings (Second Quarter After Exit)	$4,980		$4,980	
Credential Attainment Rate	69.2%		69.2%	
Measurable Skill Gains	77.3%		77.3%	

	Title II- Adult Education and Family Literacy Act Program			
	Program Year: 2026		Program Year: 2027	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	55.0%		55.0%	
Employment (Fourth Quarter After Exit)	71.0%		73.0%	
Median Earnings (Second Quarter After Exit)	$7,000		$7,250	
Credential Attainment Rate	69.5%		70.0%	
Measurable Skill Gains	70.0%		70.0%	

	Wagner-Peyser Act Employment Service Program			
	Program Year: 2026		Program Year: 2027	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	70.2%		70.2%	
Employment (Fourth Quarter After Exit)	71.7%		71.7%	
Median Earnings (Second Quarter After Exit)	$9,080		$9,080	
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable

	Vocational Rehabilitation Program			
	Program Year: 2026		Program Year: 2027	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter After Exit)	61.2%		61.7%	
Employment (Fourth Quarter After Exit)	58.9%		59.4%	
Median Earnings (Second Quarter After Exit)	$3,926		$4,122	
Credential Attainment Rate	53.9%		55.0%	
Measurable Skill Gains	63.5%		64.0%	

	All WIOA Core Programs			
	Program Year: 2026		Program Year: 2027	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Effectiveness in Serving Employers	N/A		N/A	

Additional Indicators of Performance
1.
2.
3.
4.