

# Monitoring Year-in-Review

Program Year 2024 (PY24)

## IN THIS ISSUE

[Background Definitions](#)

[WIOA Title I Monitoring Results](#)

[WIOA Program Monitoring Results](#)

[WIOA Equal Opportunity \(EO\)  
Monitoring Results](#)

[State of Indiana EO Data Analysis](#)

[WIOA Fiscal/Admin  
Monitoring Results](#)

[PY24 Noteworthy Efforts](#)

[PY24 Monitoring  
Survey Monkey Results](#)

[Migrant Seasonal Farmworker  
\(MSFW\) Monitoring Results](#)

[NextLevel Jobs/Employer Training  
Grant \(ETG\) Monitoring Results](#)

[Workforce Program  
Admin Spotlight](#)

[PY24 DWD Policy/  
Technical Assistance](#)

## Welcome!

Welcome to the fourth edition of the Indiana Department of Workforce Development's (DWD) Year-in-Review (YIR). As with past YIR documents, the PY24 YIR includes statewide aggregated compliance review results for the following workforce programs reviewed during DWD's Concurrent Review Process:

- Workforce Innovation & Opportunity Act (WIOA) Title I
  - Service Delivery, Equal Opportunity, Fiscal/Administrative
- Migrant Seasonal Farmworkers (MSFW)
- NextLevel Jobs/Employer Training Grant (ETG)

The previous edition, the [PY23 YIR Plus](#), covered the outcomes of DWD Workforce's PY23 compliance reviews in addition to those that took place the first half of PY24 (Aug-Dec 2024). This edition reflects the full four quarters of PY24 compliance review data including noteworthy actions and further ideas to consider for improvement.

Indiana's Local Workforce Development Areas (LWDAs) experienced significant changes in PY24 with the Employment Services Innovation (ESI) Project transitioning responsibility for Wagner-Peyser and RESEA service delivery from Regions' service providers to DWD Employment Services staff. At the same time, LWDAs are examining their American Job Centers (AJC), or WorkOne office structures, and experimenting with making staff available in the communities to be closer to the people who would likely benefit from WorkOne services. Challenges with staff turnover and the "do more with less" era continued.

In this continually evolving environment, monitoring reviews play an especially important role in assessing that programs and service delivery systems continue to operate and support individuals with the greatest needs to meet their employment goals. The YIR, in combination with what is learned from LWDAs' own subrecipient

monitoring efforts, can help strengthen the continuous feedback loop for process improvement. Having ongoing mechanisms for capturing, analyzing, and acting on program implementation information enables leaders to make educated decisions and align further changes with organizational needs.

PY24 statewide WIOA monitoring results continued to show a potential correlation with WIOA performance metrics. The quality of case management services appears to impact Regions' ability to meet metrics and case management related issues were most cited in DWD's compliance review reports as the area most in need of improvement. The WIOA Program section of the YIR discusses issues including file management (missing documentation, untimely data entry, insufficient documentation for supportive services), inadequate assessment documentation, and insufficient documentation indicating that identified barriers were addressed. DWD encourages LWDAs to take advantage of their peers' actions identified as noteworthy and let the Compliance Team connect you with the particular Region as specific Regions are not identified in the YIR. There are many incredible things happening across the state that are having a positive impact on the individuals and communities that LWDAs

serve. Also be sure to look at the additional recommendations for improvement. We appreciate the opportunity to work with you to ensure that the quality of DWD's workforce development programs.

## Background

Per [20 CFR 683.410\(b\)](#) and other regulations, DWD is required to conduct annual monitoring of each Local Workforce Development Area (LWDA, Region) to examine compliance with statutory, regulatory, and policy-driven requirements as they relate to WIOA Title I administrative/financial management, service delivery, and Equal Opportunity (EO) & nondiscrimination.

**DWD's full monitoring process, along with requirements for LWDA subrecipient monitoring of service providers and one-stop operators is described in the recently updated [DWD Policy 2024-07, Change 1: State and Local Subrecipient Monitoring Requirements](#).**

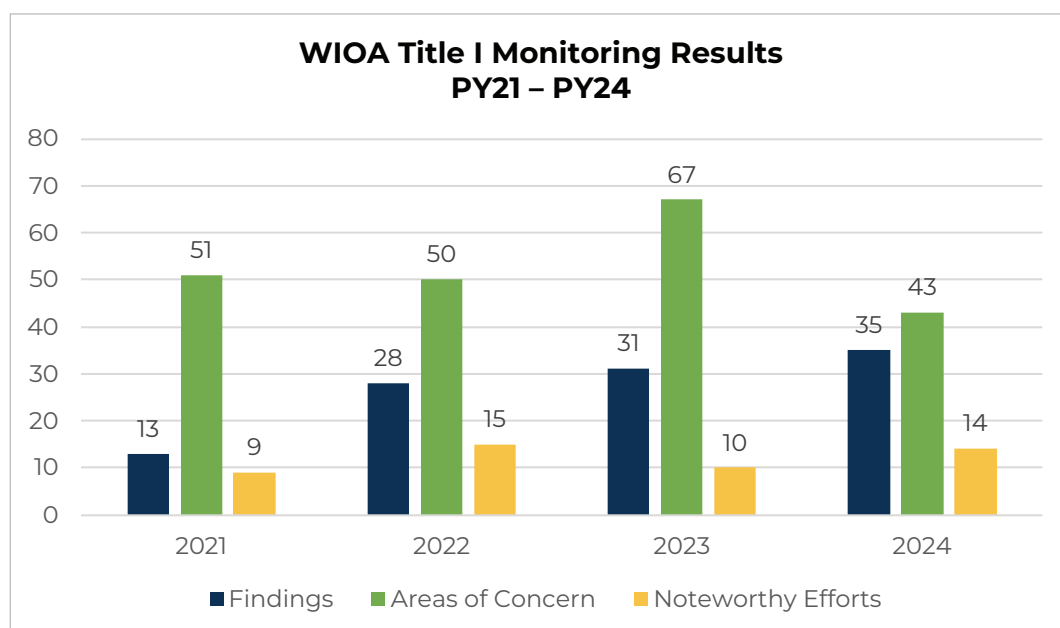
Compliance review reports are written based on Findings, Areas of Concern, and Noteworthy Efforts which are defined as follows:

**Findings:** Items identified as non-compliant with federal, state, or local regulations, policies, or procedures shall be classified as Findings. Specific areas of non-compliance are described, and citations of applicable authorities are provided. Detailed, required corrective actions are provided for resolution.

**Areas of Concern (AOCs):** Items that may or may not be compliance-based but may impede effectiveness and efficiency of service delivery to individual and business clientele. Suggestions/recommendations for improvement may be provided.

**Noteworthy Efforts:** New, unique, significant, or innovative initiatives and results, and/or notable or exemplary practices.

## WIOA Title I Monitoring



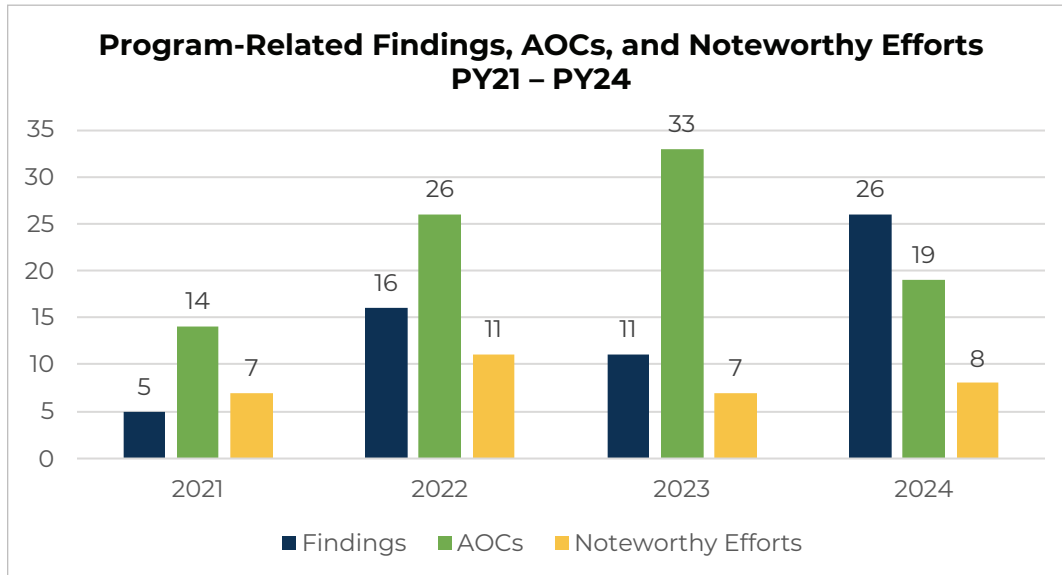
## INITIAL OBSERVATIONS:

- There has been a steady increase in Findings and AOCs from PY21 to PY23 and a significant decrease in AOCs for PY24.
- In PY24 each Region received anywhere from two to seven AOCs and between zero and six Findings. Noteworthy actions were recognized in 10 of the 12 Regions.
- WIOA review outcomes are defined as the combination of AOCs and Findings. There was a 20% decrease in overall review outcomes from PY23 to PY24 which indicates significant progress in Regions' efforts to address identified problems.

## REPEAT ISSUES:

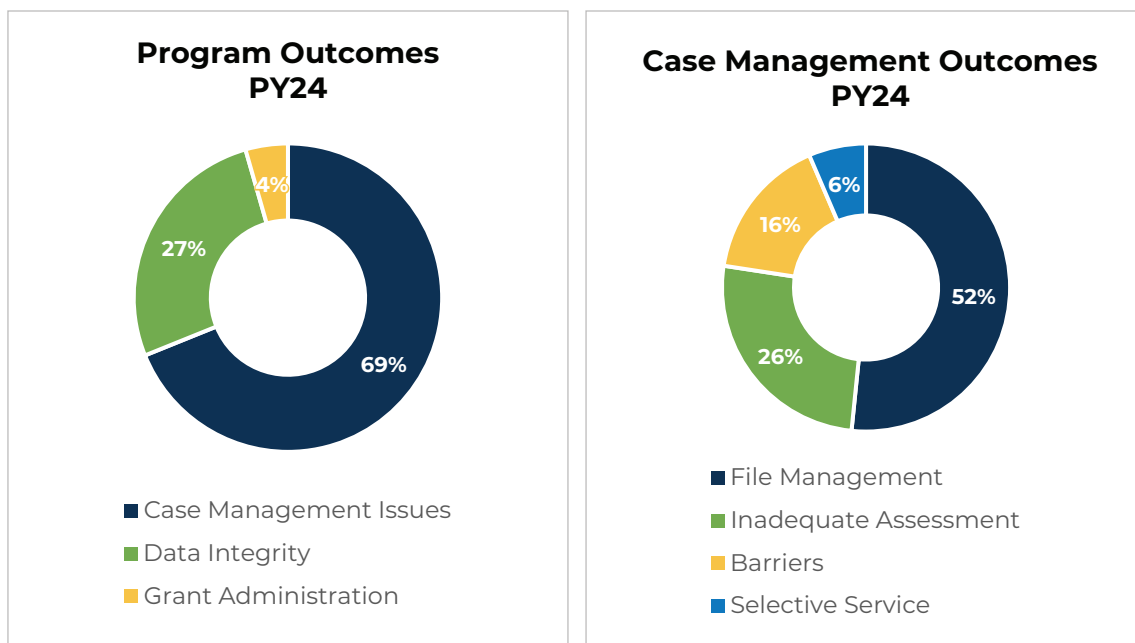
- In PY22 DWD started to label Repeat Issues in reports. Repeat Issues from PY23 monitoring accounted for the following percentages of Findings/AOCs in PY24 compliance review reports:
  - 74% of Findings (26 out of 35)
  - 14% of AOCs (6 out of 43)
  - Repeat issues were mostly cited in Regions' Service Delivery/Program sections of their reports which included reviews of participant eligibility and service delivery systems.
- DWD always takes the following information into consideration when determining whether an issue should be classified as an AOC or a Finding:
  - Some issues started as AOCs but were not addressed so were elevated to Findings the next year.
  - Sometimes AOCs were addressed but actions taken were insufficient to resolve the issue. These issues may be classified as AOCs for an additional consecutive year based on evidence that a Region is attempting to target the issue. Sometimes it may be a timing issue, e.g., a Region started implementing a new procedure or tool and the time period for DWD's monitoring sample did not align with when those changes were effective. DWD wants to give Regions credit for the efforts being made so sometimes a repeat AOC may be appropriate.
  - Similarly, sometimes Regions will address issues identified in Findings through implementing appropriate corrective action measures, but the problem still persists and is noted again the following year during monitoring. When this happens, DWD uses its review activities (staff interviews, on-site observation, participant record reviews, etc.) to evaluate the effectiveness of the Region's corrective action measures. Depending on the circumstances, the issue could be classified as a Finding again with new required corrective action, or an AOC if that would be more appropriate.

## WIOA Program Monitoring Results



- Program issues are included in the “WIOA Title I Service Delivery” section of comprehensive compliance review reports.
- While there were significantly more Findings and fewer AOCs from PY23 to PY24, the overall number of combined Findings and AOCs stayed largely the same – 44 in PY23 and 45 in PY24.

### PY24 WIOA Title I Program Outcomes



## CASE MANAGEMENT

- Inadequate case management could result in inadequate service delivery, poor performance, funding reductions, and lost opportunities related to additional funding. Issues include:
  - File Management
  - Eligibility/Inadequate Assessment
  - Failure to Address Barriers
- All of these issues are more fully detailed below with Noteworthy Efforts compiled into a separate section later in this report.

### File Management

- File Management is an essential component of case management that requires the staff's careful attention to detail. Staff oversight can prevent file management errors by obtaining required client documents and properly monitoring and managing client services and activities in ICC. Poor file management could negatively impact delivery of client services, as well as the results of DWD's data validation review of the Region.
- The most common File Management concerns identified during PY24 were:
  - Missing documents, including those needed to verify eligibility and priority of service
  - Missing required quarterly follow-up documentation
  - Lack of documentation to verify and/or justify funded services (training, supportive services & incentives)
  - Untimely data entry
  - General lack of documented staff contact and services
- File Management was the most frequently cited type of Case Management issue. 62% of File Management outcomes had been cited in Regions' PY23 compliance review reports as either AOCs or Findings.

### Eligibility/Assessments

#### Inadequate Assessment

- 8 of 12 Regions' compliance review reports contained outcomes related to sampled participant records not containing an in-depth review of education and work history which is foundational in helping determine potential patterns that may affect individuals' overall employability. Understanding factors such as a person's living situation, how they are making ends meet, etc. provide key insight into potential employment barriers and are fundamental in helping to determine additional service needs individuals may have and the type of service strategies that may need to be implemented.
- The WIOA Youth program design also requires an objective assessment of academic levels, skill levels, and service needs of each participant, which includes a review of basic skills, prior work experience, employability, interests, aptitudes, supportive service needs, and development needs ([TEGL 21-16](#)). Similarly, when staff fail to thoroughly assess and document this essential information, it is difficult to determine the additional service needs that may benefit the youth and what service strategies may be most appropriate.
- Five Regions' issues with Inadequate Assessments had previously been included in PY23 compliance review reports which may indicate that recommendations or corrective actions were not implemented or were implemented and did not have the intended result.
- Monitoring identified instances when sampled participant records failed to:
  - Include documentation of assessment activities lacking essential, basic details surrounding in-depth reviews of individuals' education and work histories, skills and abilities, living situations/how individuals are making ends meet, etc.

- Utilize the Region's own required specific assessment tools and document results per local policy.
- Include ICC documentation to support whether/how it was determined that individualized career services were appropriate for individuals to obtain or retain employment as required in [20 CFR 678.430\(b\)](#). Information noted in participant records should always provide clear justification for the provision of services provided. ([TEGL 19-16](#))
- Justify the need for WIOA training services. In most of these cases, ICC documentation failed to show how participants were unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services as required in [WIOA sec. 134\(c\)\(3\)\(A\)](#). Many of these participants were already working full-time at a self-sufficiency wage and were noted to have minimal, if any, employment barriers.
- Utilize procedures to determine when Wagner-Peyser or WIOA services would be appropriate when participants are utilizing Workforce Ready Grant or third-party training funds.

### WIOA Eligibility: Selective Service

- Two Regions' monitoring identified instances where not all sampled participant records contained required Selective Service Registration documentation ([TEGL 11-11, Change 2; DWD Policy 2021-03](#)).
- Complete and accurate documentation of Selective Service registration status is an essential component of the WIOA eligibility determination process.
- When an individual is required to register but did not, adequate documentation establishing that their failure to register was not knowing and willful must be provided in case notes and as required by local policy.
- Individuals who may have been exempt from registration require adequate documentation such as immigration records, incarceration history, etc. must be provided.

### Barriers

- 16% of PY24 Case Management review outcomes were based on sampled participants' records not addressing employment barriers with appropriate service strategies. This results in participants being less likely to achieve their education and employment goals and achieve long-term success in their careers.
- Acknowledging barriers and developing individualized service plans that utilize targeted interventions aimed at helping participants overcome barriers increases the likelihood of them achieving their goals and is one of the most valuable services case managers provide.
- Case managers should show their efforts to help clients overcome employment barriers by always documenting both successful and unsuccessful attempts to maintain regular contact with clients, as well as all referrals made to partner services and community resources.

### DATA INTEGRITY

- 27% of Program related review outcomes cited in PY24 were due to sampled participant records having Data Integrity issues which include insufficient, inconsistent or incorrect information in different elements of clients' ICC records and inaccurate reporting of Measurable Skill Gains (MSG) and Credentials.
- Contradictory information between the WIOA application, case notes, and supporting documents could result in individuals not receiving needed services.
- Case notes entered in ICC not only serve as a detailed record of a participant's progress, but also validate the services provided to participants. One of the most common errors monitors see in this area are case notes for counseling/coaching activities that do not indicate what

type of guidance or counseling was provided to the client. Many of these case notes appear to be just gathering information from the client rather than providing a service to the client. Activities entered in ICC with case notes lacking sufficient information to verify the services provided may have a negative impact on the integrity of a Region's data.

- All but one instance of Data Integrity included in PY24 compliance review reports were repeated from PY23 reports.

## GRANT ADMINISTRATION

- One Region was identified to not have its additional Priority of Service group prior approved by DWD.

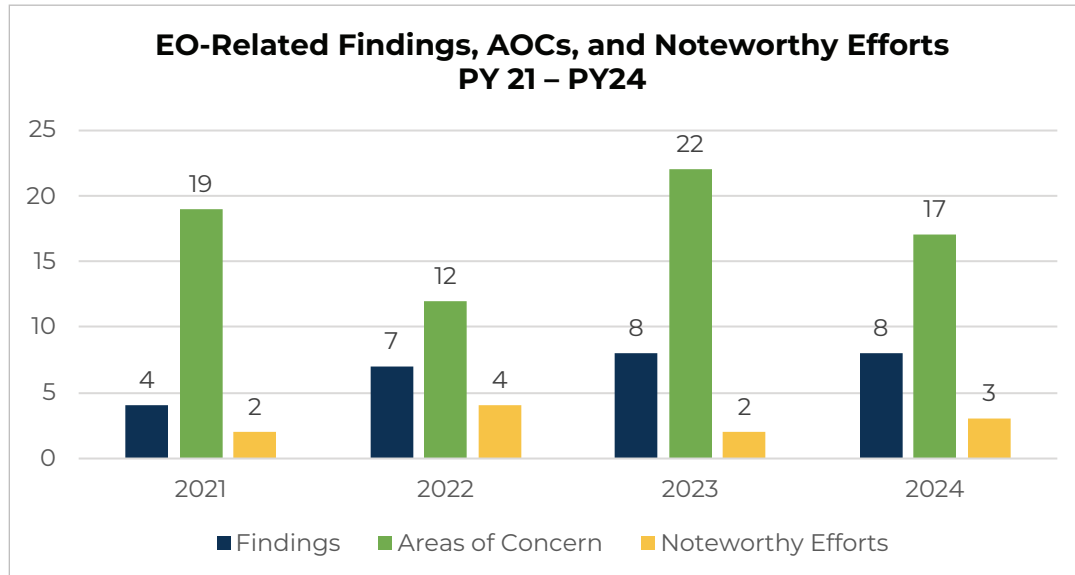
## Suggestions for Improvement

- **Contact Your Friendly DWD Workforce Program Admin & Oversight Team**
  - Please contact us at [oversight@dwd.in.gov](mailto:oversight@dwd.in.gov) and the Compliance Team, and WIOA Title I Team will work together to provide the requested assistance.
  - Either during monitoring or shortly thereafter, Regions should ask the Compliance Team to help identify case management tools or training materials that would better support their case managers. During monitoring interviews, the Compliance Team encourages case managers to pull out their cheat sheets, tools, checklists, and other resources they utilize to do their job. Talking through these materials may actually help other case managers around the state! Materials may be identified as noteworthy actions in compliance review reports and/or may be shared with other Regions as requested. Resources will not be shared without first obtaining the Region's consent.
- **Emphasize the Importance of Assessments**
  - Regions should stress the importance of in-depth assessments with staff. Assessments are the very foundation of case management so it's crucial that case managers learn and consistently practice this essential skill. Regions should consider implementing mock assessment interviews and practice documentation in their case manager training programs. If resources allow, motivational interview training may also be helpful.
- **Create Opportunities for Peers to Connect**
  - Regions may want to consider utilizing a Peer Review Team (in addition to subrecipient monitoring) to check the quality of documentation produced to identify and prevent the kinds of issues identified here. This could include reviewing the thoroughness of case notes documenting initial assessments.
  - For those Regions that include management reviews of participant eligibility documentation prior to enrollment, a review focused on documentation developed following participant enrollment could be beneficial. This could help identify and address issues with misaligned information including case notes not supporting training or supportive services, ICC activity codes not matching case notes for services delivered, erroneously reported MSGs and credentials, lack of documentation for services delivered that ultimately become individuals' exit dates, and follow-up services not being delivered.
  - Peer mentoring can help mentees develop the skills and expertise needed to support participants. It's an effective way to transfer knowledge, build a culture of collaboration, increase workplace engagement, improve communication, and possibly increase retention.
  - Pair new with more seasoned staff to observe interactions with clients at different stages in the service delivery process from conducting initial assessments, to providing counseling and follow-up services.



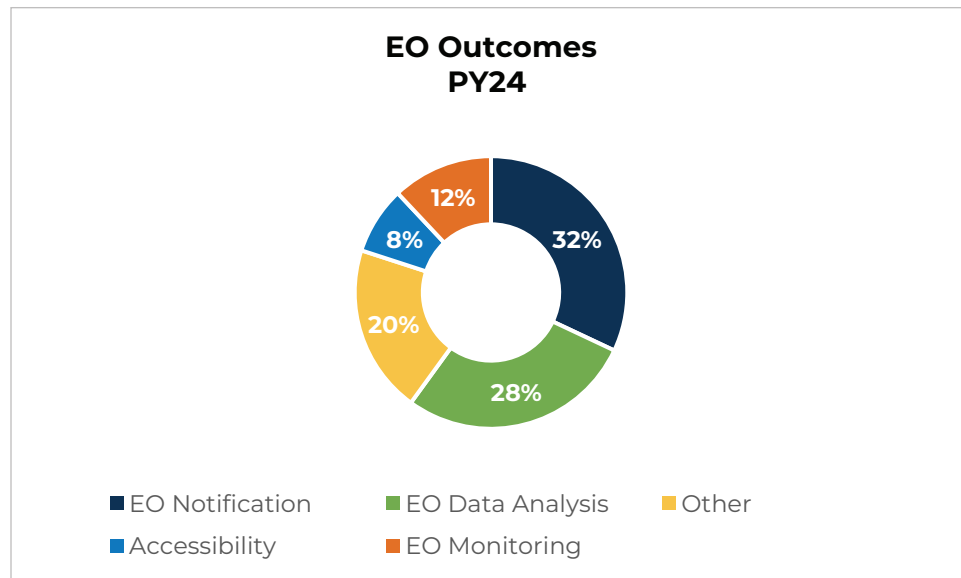
- Develop workshops that give case managers an opportunity to practice their interview skills and document results. Develop practice scenarios based on results from subrecipient monitoring that suggest there are opportunities to improve.
- Develop activities (ice breakers, games) centered around various case management topics that can be played during scheduled training times. Games such as Case Management Trivia Pursuit, Jeopardy, and Two Truths and One Nontruth can be used to encourage collaboration and teamwork, which in turn can build rapport and knowledgeable case managers.
- **Collaborate with Other Regions**
  - Consider partnering with other Regions to conduct subrecipient monitoring. People knowledgeable of workforce development systems but not familiar with your Region's day-to-day operations and staff may sometimes be better positioned to provide a more unbiased, objective assessment of how services are delivered in your Region.
  - Consider partnering with other Regions to develop a "Best Practices" group. Creating opportunities to bring Regional case managers together virtually would provide a chance to gain different perspectives as well as learn something new.
- **Use ICC as a Management Tool**
  - ICC report functions can be used to identify people's records to review. ICC could be used to pull targeted samples of individuals, i.e., people meeting specific criteria such as individuals who are homeless being referred to local social service agencies to address immediate needs for food or shelter, males over 18 to assess Selective Service Registration and any exemptions, individuals with limited English proficiency to assess case notes for use of an interpreter, etc. GeoSolutions and the DWD Performance Team offer periodic training opportunities. Regions can also submit any questions about ICC resources to the DWD Service Desk.

## WIOA Equal Opportunity (EO) Monitoring Results



- PY24 compliance reviews identified a decrease in EO-related Findings/AOCs from PY23 (31) to PY24 (25). This decrease can be attributed to Regions making improvements in:
  - Complaint Procedures being available to staff
  - EO Notifications being included as required (EO tagline on websites and marketing materials, EO assurance language in contracts/agreements, EO is the Law posted in WorkOne offices)
  - Accessibility Issues (Physical and Website)
  - Lack of EO Monitoring
- The number of repeated EO related issues decreased which illustrates that Regions are taking actions when EO issues are identified in monitoring reports.
- However, even with the overall decrease, there was an increase in issues related to Regions' EO data analysis activities.
- An issue that has not been noted for several years but was identified in PY24 WIOA compliance reviews was sampled participant records containing medical and/or disability related documentation.

All of these issues are more fully detailed below with Noteworthy Efforts compiled into a separate section later in this report.



## EO NOTIFICATION

WIOA recipients have an obligation to publish EO notice and ensure that assurance language is in applicable agreements, etc ([29 CFR 38](#)); however, 32% of EO-related Findings/AOCs in PY24 were related to Regions not doing this.

### EO Assurance Language

- Regions must include required EO Assurance Language in contracts, Memorandums of Understanding (MOUs), On-the-Job Training contracts, work-experience, and other agreements ([29 CFR 38.25-38.27](#); [DWD Policy 2016-09](#)).
- The number of Regions with sampled documents not including required EO Assurance Language went from two to four between PY23 and PY24 WIOA compliance reviews. DWD has recommended that LDWAs ensure a process that includes the Local EO officer reviewing all contracts and agreements while in draft form prior to being finalized.

### EO is the Law Notifications Not Posted Appropriately

- Regions must communicate to registrants, applicants for employment, and employees that they do not discriminate in how services are delivered ([29 CFR 38.35-38.36](#)). EO Notices must be posted in prominent places within WorkOne offices, disseminated to participants and employees, and included in group presentations.
- In PY24 reviews, monitors observed EO is the Law notices not posted as required in WorkOne offices or in personnel files.
- Conversely, some Regions included EO notices in their top three languages. For example, one Region had EO notices posted in English, Spanish, and Burmese. Another Region had notices posted in English, Spanish, and Haitian Creole.
- Please note that if there is a change in EO officers in a Region, the EO notice should be updated with the current officer's contact information.

### EO Tagline

- An EO tagline indicates that the WIOA program or activity is an equal opportunity employer/program, and that auxiliary aids and services are available upon request to individuals with disabilities and must be included in all marketing material, including written materials, social media, websites and broadcasts.

Effective for PY25 DWD monitoring, per [DWD Policy 2016-09, Change 1](#), the EO tagline is to indicate that the [program or activity in question] is an equal opportunity employer that administers equal opportunity programs. Free auxiliary aids and services are available upon request to individuals with disabilities (TDD/TTY Number: 1-800-743-3333). Free language interpretation and translation services are also available upon request.

## EO DATA ANALYSIS

- 28% of EO-related Findings/AOCs in PY24 were related to Regions' EO Data Analysis. Regions either did not conduct the analysis or conducted the analysis but did not investigate where data identified potential discrimination.

## OTHER

- 20% of Regions' EO-related monitoring issues were due to:

### Medical Diagnosis/Disability Info in Participant Records

- Sampled participants' ICC records inappropriately containing individuals' medical diagnosis or disability-related information. Per [29 CFR 38.41](#), any medical or disability-related information obtained about a particular individual, including information that could lead to the disclosure of a disability, must be collected and reported on separate forms. All such information, whether in hard copy, electronic, or both, must be maintained in one or more separate files, apart from any other information about the individual, and treated as confidential. Whether these files are electronic or hard copy, they must be locked or otherwise secured.

### Lack of EO Training

- Per [DWD Policy 2016-09](#), the Local EO Officer is required to provide training to LWDA staff and service providers. Training all AJC staff on accessibility tools for people who are deaf, have difficulty hearing, and/or have limited English proficiency is paramount to providing equal access. While not required, having a Language Access Plan (LAP) would provide staff with clear procedures and information to assist all individuals, including those with disabilities and/or LEP.

## REGIONS' EO MONITORING

- 12% of Regions' PY24 reviews included outcomes related to the quality of their EO monitoring of subrecipients.
- Local EO Officers are required to monitor their subrecipient service provider(s) and OSO to ensure their practices align with nondiscrimination and EO obligations ([20 CFR 38.31](#)).
- Monitoring is an assessment to determine whether the Region's subrecipient(s) have fulfilled their obligations under Section 188 of WIOA and must take place at least annually. Results of monitoring should be provided to subrecipients in a written summary or report with outcomes and include a resolution process ([DWD Policy 2016-09, Change 1](#)).
- Previous DWD monitoring has identified Regions' efforts lacking around EO monitoring or no monitoring being conducted at all. It should be noted that for PY24 most Regions have improved their subrecipient EO monitoring.

## ACCESSIBILITY

- 8% of Regions' EO-related review outcomes in PY24 related to their WorkOne office locations not being physically accessible or their websites lacking accessibility features.

- Regions must ensure physical and programmatic accessibility at their facilities, ensuring that they are accessible and usable by individuals with disabilities. Regulations require that all comprehensive and affiliate offices meet applicable accessibility obligations under Section 504 of the Rehabilitation Act and the implementing regulations at [29 CFR Part 32](#) and the [Americans with Disability Act \(ADA\)](#).
- In addition, Regions must ensure programmatic accessibility to facilities, programs and activities for individuals with disabilities. According to [29 CFR Part 38.15\(a\)](#)<sup>1</sup>, Regions must ensure that their communication with participants with disabilities is as effective as their communications with other participants.
- A resource that Regions can research to improve their websites is the [W3C Web Accessibility Initiative](#) requirements for people with disabilities.

## State of Indiana EO Data Analysis

- WIOA grant recipients are required to conduct an EO data analysis and subsequent investigation into significant differences identified in populations receiving services ([29 CFR 38.51\(b\)](#)).
- DWD's State EO Officer conducts an EO data analysis utilizing a standard deviation (SD) formula developed by the National Association of State Workforce Agencies' (NASWA) EO Subcommittee which compares program WIOA recipient demographics with US Census data on gender, race, ethnicity, age, and disability status.
- For PY24 monitoring, DWD's analysis was done comparing PY23 ICC data for WIOA enrollments to both population labor force and unemployment data from the U.S. Census. The goal of the analysis is to identify if Indiana's Regions are serving protected groups at the level expected given the demographics of the population within each area.
- We would expect the numbers of individuals served in an area to be representative of individuals in the community. SD is used to measure how likely an outcome is due to random chance. We assume that a SD within -2.0 and +2.0 is due to random chance and a SD outside that range is due to outside factors and should be investigated for possible discrimination and/or possible reasons for the outlier.
- If a category's SD is greater than +2.0, it suggests services may have been provided significantly less to people in that protected group and therefore indicates a higher probability of possible discrimination.

The table below shows Indiana's data analysis results as an entire state. Statewide we can see that protected groups with higher SDs include individuals 55+ years old, people of Asian race, and people identifying as "Other" race. These were the same protected groups with high SDs for PY2022 and PY2021 data. The Compliance Team's analysis of each Region was included in each Region's WIOA monitoring reports. Below is an analysis for the State of Indiana for comparison purposes.

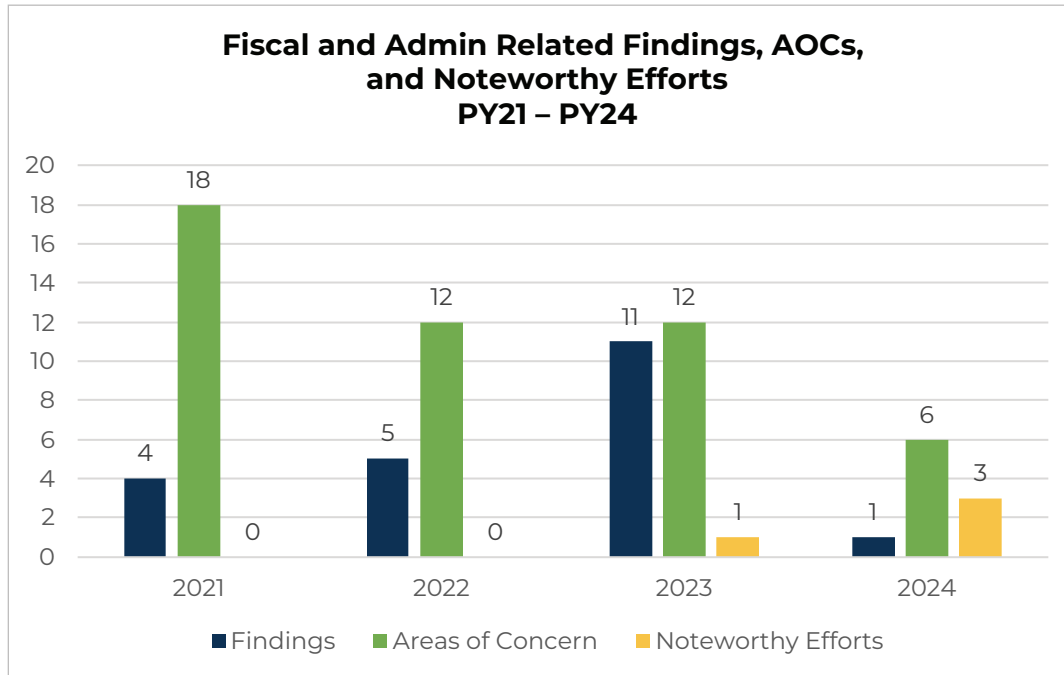
State of Indiana Indiana PY23 WIOA Participation (Labor Force Data)		
Category	Deviation	Probability of Potential Discrimination
Black/African American	-58.17	No
Other	5.54	Yes
Asian	4.79	Yes
Ethnicity	-6.07	No
Age	19.95	Yes
Disability	-21.01	No
Gender	-6.58	No
LEP	-1.35	No

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

## SUGGESTIONS FOR IMPROVEMENT

- Local EO Officers should utilize the EO SharePoint site which has resources along with Regional best practices.
- Consider combining subrecipient EO monitoring with WIOA Program subrecipient monitoring or consider including an EO monitoring results section in the WIOA reports provided to the recipients. This will ensure that all recipients are monitored, and results are communicated to them. Any feedback provided can be used to plan additional training.
- Communicate changes in Local EO Officers to staff as soon as possible, update EO Notices and walk through offices to post these, and update websites.
- Actively participate in quarterly DWD EO meetings. This provides an opportunity for sharing ideas and perspectives and gives Regions a chance for brainstorming together.
- Be sure to document all training for Local EO Officers as well as staff. If you thought a particular training had especially great information or was particularly interesting, share it with other EO Officers.
- Consider incorporating case scenarios in staff training on what to do or not to do in different situations. Examples could include how to assist a customer with a disability, or a customer with hearing or visual impairments, or someone with limited English proficiency.
- Consider having a process to ensure that EO assurance language is reviewed in all new contracts and agreements.
- Ensure all employees, new and current, have the EO notice signed in their personnel file.
- Contact [EO@dwd.in.gov](mailto:EO@dwd.in.gov) or contact the State EO officer for questions, concerns, resources and overall guidance.

## WIOA Fiscal/Admin Monitoring Results

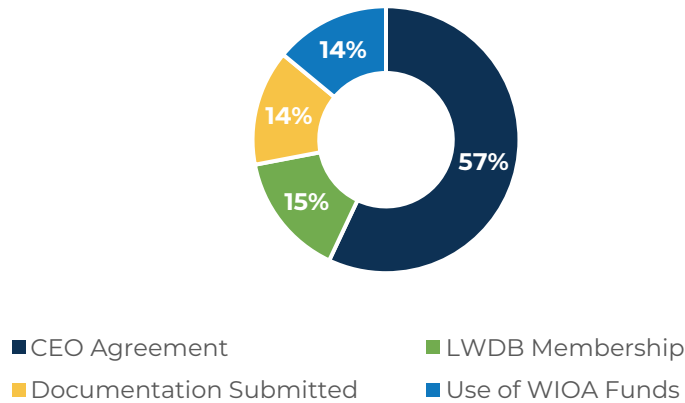


- WIOA-Fiscal/Admin related Findings/AOCs decreased significantly from PY23 to PY24 due to Regions making improvements related to:
  - Chief Elected Officials (CEO) Agreements containing all required information
  - Strong internal controls in place
  - Compliant uses of WIOA funds
  - Multiple Roles Agreements (MRAs) containing clear delineation of roles and management structures
  - All Regions having one-stop operators and MOUs in place
  - Subrecipient monitoring documentation being available for monitors
  - Infrastructure Agreements being submitted timely
- The one Fiscal/Admin related area cited the same number of times in PY23 and PY24 WIOA compliance reviews was related to Local Workforce Development Board (LWDB) membership requirements not being met.

The seven Fiscal/Admin issues identified in PY24 monitoring reviews are detailed below with Noteworthy Efforts compiled into a separate section later in this document.

**For PY25 monitoring, per [DWD Policy 2024-07, Change 1](#), DWD will be validating that Regions are implementing their local monitoring policies which should include monitoring of One Stop Operators.**

### Fiscal/Admin Related Findings and AOCs PY24



## CEO AGREEMENTS

- CEO Agreements represent a reoccurring governance issue for PY24. Persistent issues with agreements include missing CEO signatures and incomplete population data.
  - Deficiencies in CEO agreements may impede essential functions of the local workforce development system, delay timely appointments of LWDB members, and create ambiguity regarding defined roles, responsibilities, decision making authority, and accountability, thereby placing Regions and their communities at significant risk.

## LWDB MEMBERSHIP

- LWDB membership including members that do not meet the qualifications for the areas they are intended to represent.
  - Proper board composition is essential to ensure statutory representation from business, labor, education, government, and community sectors. Without this alignment, there is a risk of under representation, which may compromise the integrity of decision-making and hinder collaboration, strategic planning, and effective oversight of the workforce system. Inclusive and representative membership is critical to developing and implementing policies and programs that strengthen workforce skills, expand employment opportunities, and support the economic vitality of local communities, Regions, and the State as a whole.

## DOCUMENTS NOT SUBMITTED

- One Region was identified in DWD's PY24 monitoring for not timely submitting its PY24 budget corrections and reconciliation. This was a repeat issue for the Region. Pursuant to its policy, DWD imposed a penalty and withheld the July through October portion of the PY24 IFA budget sharing costs.
  - [DWD Policy 2018-04, Change 3](#), states, "The first reconciliation is due 60 days after the end of December in the year of the current IFA budget," and "If IFA budgets are submitted over 30 days past the due date with no extension filed or are submitted past the approved extension due date, then partners would only be paid from the time the



IFA budget has been submitted and approved until the end of the budget year rather than receiving payments starting on July 1.”

## USE OF WIOA FUNDS

- One Region was identified in PY24 monitoring as making inappropriate incentive payments to a WIOA youth applicant for their participation in WIOA activities. This was also a violation of the LWDA'S policy.

## SUGGESTIONS FOR IMPROVEMENT

### CEO Agreements

- LWDA's executive leadership should consider holding a routine meeting (e.g., annually) with each CEO to review and discuss their responsibilities under WIOA, highlight the importance of active engagement and the benefits of the relationship, and reaffirm the impact that CEO involvement has on their communities and the Region.
- The agreement could also be included as an agenda item during a scheduled meeting, allowing any missing signatures to be obtained on the spot.
- Establish reminders to review the CEO Agreement during election years so when changes in elected officials occur actions can be taken to identify and connect with the current elected officials.
- Consider reviewing U.S. Census data to obtain information on population sizes. This will help support compliance with [DWD Policy 2019-02, Change 4](#).

### LWDB Membership

- A best practice would be for board staff to routinely (e.g., annually) review the LWDB membership template to verify that its composition complies with federal regulations, and state and local policies.
- Consider developing processes to support LWDB compliance needs and to foster ongoing collaboration and communication between board members, local officials, and DWD. These may include:
  - Reviewing/revising the Board's by-laws to ensure that they clearly outline the appointment process, member qualifications, terms of service, and address potential issues related to membership appointments.
  - Documenting the process for filling board vacancies in a timely manner (60 days).
  - Providing ongoing training opportunities for LWDB members to enhance their knowledge.
  - Routinely soliciting board member feedback.

### Fiscal Monitoring

- Create a plan of action with timeline for reviewing and revising as needed the LWDA's financial, subrecipient, and travel policies/procedures to ensure continued consistent application of guidance and compliance with regulations, policies, and guidelines. Taking these measures helps maintain effective internal controls over WIOA Title I funds.
- Regions may want to develop a master timeline that contains expiration dates of its key Governance documents. At a minimum, CEO Agreements must be updated every five years and may need more frequent updates depending on when elected officials' terms expire and when there are newly elected officials. MOUs are due every three years. IFA reconciliations are due twice a year. The timeline should include dates for when to begin working to update/revise/develop new documents as needed.
- The duration of MRAs are based on LWDA's board staff, service provider, fiscal agent, and one-stop operator contracts. Every time a new contract is awarded for one of these major roles it should trigger a review of the MRA so updates on procurement descriptions, structure, and

relationships can be made as needed. Including position titles instead of names of specific staff will prevent needing to update documents when staff change.

## PY24 Noteworthy Efforts

Noteworthy Efforts are DWD's way of recognizing Regions for implementing innovative and impactful practices. These efforts reflect strategies developed by the Regions that go beyond regulatory, statutory, and policy requirements to support their staff and improve outcomes for participants and other stakeholders. They highlight Regions' spirit of service and dedication. For information on any of these Noteworthy Efforts, please contact the Compliance Team at [oversight@dwd.IN.gov](mailto:oversight@dwd.IN.gov) and we will connect you with the appropriate Region.

### ACCESSIBILITY

#### Digital Outreach Strategy

One Region uses a contractor to perform digital marketing and outreach services which appears to have resulted in more effective outreach to the community. The Region has social media ads that appear on YouTube, Facebook, and Instagram approximately once per month that provide information on WorkOne-sponsored events and services. Through digital marketing and outreach, the Region receives immediate feedback on how the ads are performing, such as ad impressions and clicks, which allows strategies to be adjusted instantly for better results. The ads are also able to reach specific demographics, ensuring the Region's message gets to the specific people who are likely to benefit from a specialized event or service. The Region's digital outreach strategy appears to be increasing awareness of WorkOne services by reaching a broader audience, including those in the community who may not be aware of the WorkOne offices and the many programs and services available.

#### Combined Language and Disability Accessibility Plan

This Region's Language Access Plan went a step farther by including plans for how individuals with disabilities can access WIOA services. This includes having computers with Ease of Access Tools, providing written materials in Braille and large print, and ensuring WorkOne office spaces meet Americans with Disabilities (ADA) requirements. The Region's Language Access Plan provides service provider staff the steps they need to provide timely services to persons who may have visual impairments, to schedule sign language interpreters for people who have difficulty hearing, to provide assistance to individuals with limited English proficiency, and to provide timely requests for accommodations to support individuals with disabilities. The plan describes the Region's training on EO and ADA requirements and how its subrecipients will be routinely monitored. This important resource information helps ensure that staff understand how to effectively support people with disabilities and that the public has equal access to WorkOne system's meaningful services.

#### WorkOne Accessibility Workstation Flyer

Physical and programmatic accessibility requirements assure that people with disabilities have an equal opportunity to participate in and enjoy the benefits of the WorkOne system. To help support these requirements one Region developed a WorkOne Accessibility Workstation Flyer that explains the services available to individuals with disabilities by providing pictures of the desktop shortcuts, and including accessibility assistance helplines, Video Relay Service information, website resources and phone numbers. Having this resource available makes it easier for the staff to provide services and for clients to comfortably use the workstation's features independently.

## Language Accessibility

One LWDA identified the four most prominent languages in the Region (English, Spanish, Marshallese, and Haitian Creole) and has EO is the Law posters posted in the welcome area in each of these languages. One of the WorkOne offices has very large, visible signage in the welcome area that is in English and Spanish, including the TV teleprompter and all job orders.

## PROVIDING RESOURCES TO SUPPORT PARTICIPANTS

### The Kid Zone

The Kid Zone play area located in one WorkOne office creates a welcoming and supportive environment for young children which makes services/resources more accessible to all parents and caregivers. Finding affordable and reliable childcare while unemployed or underemployed can be challenging and it may not always be readily available when needed. Creating a space with activities for kids makes it easier for parents and caregivers to access services and promotes more productive and efficient office visits.

### Coffee Connections

Clients in one Region have the opportunity to participate in its Coffee Connections workshops, which cover a variety of topics, including networking, interview skills, and resume building. While a WIOA case manager leads the workshop, it is designed as more of a discussion where customers are encouraged to share their personal experiences with job searching. Case managers provide advice or guidance about topics and situations that arise during the discussion, tying in information about local resources and WorkOne services in a way that promotes engagement. It also serves as an opportunity for case managers to build rapport with potential WIOA clients.

During the workshop observed by the Compliance Team, the case manager shared real successes that clients had since attending the weekly workshop, which made others more comfortable sharing and asking questions. When clients expressed concerns about not hearing from employers after submitting resumes, case managers provided information about the Applicant Tracking System (ATS) and how artificial intelligence is used to weed out resumes. They normalized why people may not be getting calls; it's not automatically because they aren't good candidates, and WorkOne has the answers to help them move forward. With its welcoming atmosphere and invaluable information, Coffee Connections serves as a great commercial for other WorkOne services, while offering hope to jobseekers during a difficult time.

## PROVIDING RESOURCES TO SUPPORT STAFF

### Comprehensive Subrecipient Fiscal Monitoring Checklist

One LWDA developed and uses a subrecipient fiscal monitoring tool that is well organized, comprehensive, and easy to understand. The checklist navigates users through eight internal control categories, including financial management, administration, budgeting/allocations, and invoicing/reporting. Categories contain questions with prompts to follow up for additional information. Based on the Uniform Guidelines, the checklist validates that required written policies and recommended written procedures for effective internal controls are in place. Of particular interest is the section assessing the subrecipient's single audit results and how any necessary follow-up was conducted. The LWDA has created an excellent fiscal monitoring tool and training resource for new staff, board members, and others interested in the LWDA's fiscal monitoring methodology.

## Ring Camera System

DWD's site visits during annual WIOA monitoring confirmed that WIOA staffing in one Region's outlying offices is limited. Combined with needing to have reduced office hours these circumstances lead one Region to take proactive measures to enhance both staff safety and customer accessibility by installing a Ring camera system at affiliate offices. Using Ring cameras enables customers to connect with staff during business hours when an affiliate office may be unstaffed/closed, while also mitigating risks associated with having staff onsite alone. This approach reflects the Region's forward-thinking strategy to address safety concerns and expand real-time access to WorkOne staff and services. It demonstrates the Region's strong commitment to security, accessibility, and the overall well-being of both staff and customers.

## Resume Roundtable

The Resume Roundtable brings WIOA case managers and the Business Services Team together to conduct peer reviews on clients' resumes. This collaboration helps everyone meet their respective goals. Most importantly it facilitates job placements for clients, but it also supports building case managers' resume development skills and educates Business Services staff's awareness of the clients seeking employment opportunities and their individual skill sets. According to the Region, this practice was partly modeled on the Jobs for Veterans State Grants where dedicated veteran staff case managers and business services staff coordinate their efforts to best support veterans seeking employment.

## Comprehensive Staff Onboarding and Training

DWD monitoring identified one Region that had developed and implemented comprehensive onboarding and staff training practices aimed at enhancing employee skills and fostering a culture of continuous learning/improvement. New staff receive training in phases. Training is delivered using a blend of methods including reading materials, instruction by leadership and management information systems teams, job shadowing, and mentorship. This variety caters to different learning styles, making training more accessible and engaging. Additionally, seasoned staff receive regular refresher training and are involved in the training process, allowing them to voice their own training needs and interests.

## Assessment Tools

The Compliance Team's participant record review identified that one Region's clients had received particularly thorough, individualized assessments. During interviews case managers indicated that using the Region's locally developed Intake/Barriers Matrix to conduct assessment was a huge support. This tool, along with the Region's Assessment and other case management policies, establishes a standardized approach for case managers to consistently identify and document participants' barriers and additional relevant factors so that the results are individualized and reflect participants' circumstances and needs. Similarly, the Region developed a packet for participants interested in training to work through to help them consider various issues that may arise during training, such as transportation and childcare, that could potentially impact their ability to complete their program successfully. This also helps case managers be able to clearly identify and address potential barriers. Instituting consistent use of tools like these led to quality participant records and appeared to contribute to the Region's success serving their clients.

## Supports for Registered Apprenticeships

This Region has created a series of tools to support RAPs. A RAP checklist assists all parties, internal and external, with their source documentation needs. In addition, the Region has also been successful with tracking its apprentices and pre-apprentices' progress through a color coded excel tracker. The Region has implemented an internal quality review that consists of at least three internal departments

that review a variety of participant data for accuracy. These three actions the Region has implemented complement each other and have limited the number of data entry errors needing to be corrected.

### **Job Order Data Mining in ICC**

During the ABA interview one Region discussed the various strategies it has implemented to engage its business community. The Region explained its data mining activities within ICC, specifically filtering active and open employer job orders, quantity of employees needed, and occupation. The Region is reviewing and assessing whether occupations are apprenticeable: do they involve skills customarily learned through on the job supervised learning, are the occupations commonly recognized throughout an industry, do they involve the progressive attainment of manual, mechanical or technical skills and knowledge, do they require related instruction to supplement on-the-job learning?

This approach of using ICC to data mine job orders supports the Region to begin researching details about the employers and tailor their outreach strategies to a specific employer to discuss the benefits/return on investment of apprenticeships, such as employee retention and upskilling their workforce. More importantly, the Region is teaching employers how to develop work-based learning programs that will create a skilled talent network/pipeline for future labor workforce needs. This approach is both innovative and a best practice for expanding Registered Apprenticeship opportunities.

## **PROVIDING RESOURCES TO SUPPORT EMPLOYERS & COMMUNITY PARTNERS**

### **Interviews at WorkOne Offices**

One Region invites employers to conduct their job interviews in WorkOne offices. This practice has helped build and maintain the Region's strong relationships with its communities' employers that are vital to the LWDB's mission. In addition to providing value to employers, this practice ensures that people physically enter WorkOne offices, which supports building awareness of WorkOne and partner services that are available at the location. It also helps promote WorkOne services as people who interview or secure employment at a WorkOne office may associate these events as positive experiences and be more likely to trust and have confidence in WorkOne in the future.

### **'White Glove' Experience**

This Region has adopted a strategic approach to employer engagement by assigning Regional staff to perform data entry for employers participating in Registered Apprenticeship programs. While this support aligns with routine program administration of the ABA grant, the Region has effectively positioned completing this function as a value-added, "white glove" service to participating employers. By marketing this support as a premium offering, the Region is able to highlight its commitment to reducing employer burden, promoting ease of participation, and reinforcing its role as a responsive and employer-friendly partner. This framing has helped increase employer receptiveness and engagement, while simultaneously supporting data integrity through standardized and accurate data entry by trained Regional staff. This approach also demonstrates how intentional messaging and service positioning can enhance perceived value and deepen partnerships without requiring additional resources.

### **Stakeholder Recognition Awards**

Sponsoring an annual Stakeholder Recognition Awards ceremony is one Region's unique approach to publicize the accomplishments of the workforce development ecosystem in its area. The LWDB hosts an annual September meeting to present an overview of events that occurred in the prior program year. During this meeting, the Region distributes the Workforce Board Annual Report composed of a

message from the board chair, the Regional mission, accomplishments, financials, and the strategic plan outlining goals for the upcoming program year.

Additionally, the annual report includes Client of the Year, Community Partner of the Year, and Business of the Year awards presented to the Region's stakeholders. The board's Business Services and Operations Committees oversee the nomination and selection processes. Award recipients are notified and receive an invitation to the annual meeting where they receive a plaque. The awards are unique in that they acknowledge the contributions of the entire workforce system and how each connects to the success of the other.

## Community Communication

One Region demonstrated its commitment to ongoing stakeholder communications by producing two publications aimed at different audiences. A Year in Review summary posted on the Region's website includes photographs, illustrated statistics of the LWDA's impact, and narrative descriptions of events the Local Board either sponsored or participated in. The publication covers both how SIW supports economic development for its local employers and businesses and develops the talent of its youth and other populations. Additionally, it contains information on the Board's funding and showcases the different levels of financial commitment that investors have made to support the Board's vision of a workforce that empowers Regional businesses to be competitive in a global economy.

A second document, a newsletter, supports the LWDA's community partners, non-profits, and social service agencies by sharing available resources and publicizing information on job fairs and upcoming community events. The LWDA's one-stop operator develops this monthly newsletter and invites partners to submit content. The newsletter is shared via email with all partners. An issue provided during DWD's monitoring contained information on upcoming partner meetings, two hiring events, a Service Provider Day, and several upcoming trainings hosted by different partner agencies. The LWDA's commitment to its communities comes across clearly through every page of these publications.

# PY24 Monitoring Survey Monkey Results

## Background

As part of DWD's commitment to continuous quality improvement, the Compliance Team conducted a survey to solicit LWDA feedback on our monitoring process and to help guide our work in PY25. LWDA Executive Directors, Operations Directors, and board staff identified as DWD's points of contact for the PY24 reviews were asked to complete the survey. LWDA's were also encouraged to forward the survey link to any of the Region's service providers.

## Results

The Compliance Team received a total of 16 responses: 2 respondents identified as Executive Directors, 4 as VP/Director of Operations, 2 as Regional Points of Contact and one as Service Provider. There was an equal mix of respondents who did and did not identify their Region.

- All respondents indicated that they use the resources available on DWD's website to help prepare for compliance reviews. (Always 75%, Usually 25%)
- Most respondents (88%) indicated that lead times for monitoring announcement letters, due dates for requested documents, and draft monitoring schedules are appropriate.
- Most respondents (88%) agreed that DWD's review activities provide an accurate picture of how Regional service delivery systems operate.



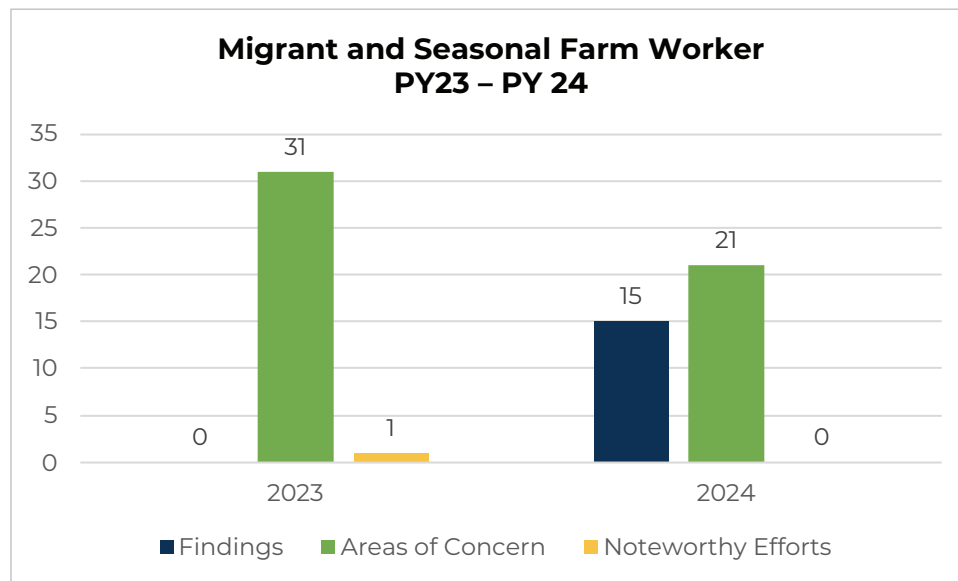
- Responses varied from Regional partners regarding comprehensive compliance reviews being more efficient than to DWD reviewing individual programs at different times throughout the year. (25% Strongly Agreed, 44% Agreed, 31% Neutral)
- Regarding the format of the final Comprehensive Monitoring report being exception based, 12% responded neutrally, while 88% agreed that this format provided sufficient information to understand why issues are identified as non-compliant or potentially impacting effectiveness/efficiency of the service delivery system.
- 94% of respondents agreed (31% strongly) that the detailed analysis of individual client records conveyed in the Participant Record Review Summary spreadsheet is useful. Several respondents shared that their Regions use Participant Record Review Summary information to identify patterns of errors which are addressed immediately through staff training, as well as to support their internal monitoring process and MIS reviews. Some Regions conveyed that the information provided is also leveraged for use in performance evaluation and to recognize best practices of quality documentation.
- Similarly, most respondents indicated that their Regions find the statewide aggregated annual monitoring review results analysis in the Year in Review (YIR) to be useful. Several respondents indicated that they review best practices across the state included in the YIR for possible adaptation in their own local service delivery systems and some noted that the YIR provides prospective for how their Region is performing compared to other Regions across the state.
- Specific Issues & Next Steps

Many respondents' comments indicated that the current monitoring process seems to be working well. While overall comments were positive, DWD also appreciated the suggestions for improvement and would like to take this opportunity to address some of those suggestions.

One respondent indicated that while their Region likes the comprehensive monitoring process, they suggested that the final monitoring report be broken down into Program Sections or completely different Program Reports. A potential consequence for service providers was also highlighted in this Region's comments, as a monitoring report with 'extra' findings could impact the service provider's ability to bid on the next cycle. The Compliance Team is addressing this issue by reformatting the PY25 Comprehensive Monitoring Report template to clearly break out the specific programs covered in the report.

- A few comments highlighted the need for DWD staff to be more forthcoming during exit interviews, i.e. feedback during the exit call is positive but then there are quite a few negatives in the report. Expectations for how and what needs to be communicated to the Regions during review activities will be revisited with all monitoring team members for the PY25 monitoring cycle.
- A couple of respondents expressed difficulty meeting documentation due dates when deadlines fall during the holiday season, and that additional time is sometimes needed when information needs to be collected from outside data sources or when samples may require many documents to be scanned. This is understandable and Regions needing additional time for document submission can request it as needed by emailing the Compliance Team at [oversight@dwd.in.gov](mailto:oversight@dwd.in.gov).
- One respondent expressed concern regarding DWD issuing Findings/AOCS based on the LWDA's non-compliance with their own local policy. Review outcomes based on local policies not being followed aligns with the Department of Labor's practices when conducting reviews of DWD. A purpose of monitoring is to identify when service delivery practices do not align with local policies and need to be updated to ensure consistency.

## Migrant Seasonal Farmworkers (MSFW) Monitoring Results



- MSFW related monitoring outcomes increased slightly between PY23 and PY24 going from 31 to 36 Findings/AOCs.
- This change was due to:
  - Increased numbers of participant records' case notes not identifying histories of farm work.
  - Increased numbers of Regions' MSFW binders containing expired job orders or job orders posted with employer information
- Conversely, some improvements were noted with the following::
  - Complaint posters being present in WorkOne offices visited
  - MSFW referral systems being in place
  - Service provider staff being knowledgeable of the Agriculture Recruitment System (ARS)
  - Processes being in place for filing MSFW related complaints or apparent violations
- It should be noted that in the spring of 2025, following the transition of Employment Services case management from being delivered by service provider staff to DWD Wagner-Peyser staff, monitoring reports continued to identify MSFW related findings as needed. However, DWD's MSFW team continues to review the impact of the Final Rule's merit staffing requirements against the flexibility that may be established under the pending proposed rule.

### STATEWIDE EQUITY INDICATORS

In accordance with [20 CFR 653.109\(g\)](#), state workforce agencies must meet equity indicators that address employment services and include, at a minimum, individuals referred to a job, receiving job development, and referred to supportive or career services. The MSFW Service Level Indicator Report below encapsulates the State of Indiana's performance regarding these key metrics.



Equity Ratio Indicators						
Cohort Period: 07/01/24 – 06/30/25						
Indicator Name	MSFWs		Non-MSFWs		Equity	
	Count	Percent	Count	Percent	Yes	No
Total Participants	79	100%	39,574	100%		
1. Received Basic Career Services (Staff-Assisted)	49	62%	17,495	44%	Yes	–
2. Received Staff-Assisted Career Guidance Services	44	56%	15,208	38%	Yes	–
3. Received Staff-Assisted Job Search Activities	4	5%	2,883	7%	–	No
4. Referred to Employment	8	10%	3,244	8%	Yes	–
5. Received Unemployment Insurance (UI) Claim Assistance	0	0%	0	0%	Yes	–
6. Referred to Federal Training	7	9%	2,647	7%	Yes	–
7. Referred to Other Federal/State Assistance	12	15%	3,510	9%	Yes	–
8. Received Individualized Career Service	62	78%	37,415	95%	–	No
					6	2

### Case Note Procedures

- All 12 Regions had MSFW-related AOC and findings that had to do with MSFW participants' case notes not containing work histories that included farm work. Not including this information could potentially limit eligibility, which may impact participants' access to services.

### Lack of Participant Supports

36% of Regions' DWD monitoring identified issues related to supports not being in place to help individuals research farm work opportunities.

#### Expired Job/Clearance Order Binders

- Clearance orders that are expired should be separated and stored for a minimum of 3 years. Advertising for expired clearance orders may be viewed as false advertisement and hinder relationships with job seekers.

#### Published Job/Clearance Orders Containing Employer Information

- These were also found in MSFW Binders. The MSFW Binder advertises Criteria Job/Clearance orders that are required to suppress employers information so that the clearance orders terms and conditions can be read to job seeker interested in these positions.

### Training Processes

- Five out of 12 Regions had an AOC or finding on the ARS. While Regions are promoting agricultural 790As for agricultural job/clearance orders, monitoring results showed that many Regions did not understand the full benefits of using the ARS. This was documented through multiple Regions self-attesting to not using the ARS and self-attesting to having no relationship with local agricultural employers. This was also confirmed through ICC data where progress would be tracked.
- In accordance with [DWD TA 2022-21, Change 1](#), the ARS is a key component of the Monitor Advocate System, and AJC staff must be trained on the Monitor Advocate System. Proper data entry for accurate federal reporting ensures MSFW are being appropriately identified, engaged, and equitably served by all local staff.

## Referral Processes

- 14% of MSFW-related Findings/AOCs were a result of improper identification and referrals for MSFWs. All Regions must use [DWD Policy 2022-19, Change 1](#) and the MSFW Desk Reference to help identify MSFWs, document all MSFW work history, and understand the activity codes that case managers should use when they have provided services to a participant. A lack of referrals to the National Farmworker Jobs Program (NFJP) finding was also identified in five Regions' reviews.

**For PY25, the State Monitor Advocate (SMA) will conduct reviews to assess how MSFW services are being delivered. To minimize disruption to local areas' operations, the SMA will conduct staff interviews in comprehensive WorkOne offices during the Region's DWD WIOA compliance reviews. The SMA will interview and/or obtain information from Wagner-Peyser front desk staff, the Region's Employment Services Area Manager (ESAM), Outreach Specialists, the Local Veterans Employment Representative (LVER), and the Region's service provider staff to the extent they serve MSFW clients. DWD is continuing to assess the impact of the Final Rule on merit staffing requirements against the flexibility that may be available under the pending proposed rule.**

## SUGGESTIONS FOR IMPROVEMENT

- Advertise agriculture jobs through job fairs or the WorkOne Offices to increase domestic workers' access to employment with sustainable wages. When domestic workers take these jobs, the SMA can conduct field checks to ensure that employers are abiding by the terms and conditions of the agreement as well as all employment-related laws. Finally, when there is a shortage of workers, the employer then has the right to hire H-2A workers that travel to the state to work on a seasonal or temporary basis.
- Improving efforts to identify and document MSFWs would assist MSFWs more proportionately, thus increasing the Measurable Service Level Indicators statewide.
- Consider incorporating case scenarios in staff training on what to do or not to do when someone enters a WorkOne office and through conversation identifies that they have a history that includes farm or other work associated with the MSFW program.
- The SMA can provide tools and best practices for case noting services provided to MSFWs and accurately coding these in ICC.
- Get to know, or continue getting to know the NFJP partner, Proteus Inc., to refer/co-enroll MSFW participants and train all staff working with the MSFW population on how to document referrals in ICC.
- Get to know your Region's DWD MSFW Outreach Workers. DWD has two MSFW outreach workers: one provides outreach in the northern half of the state (Maria Gonzalez: [MGonzalez1@dwd.in.gov](mailto:MGonzalez1@dwd.in.gov)), while the other focuses on the southern half of the state (Maria (Mary) Perez: [MariPerez@dwd.in.gov](mailto:MariPerez@dwd.in.gov)). If staff serving the MSFW population is aware of MSFWs in need of outreach services, please contact the aforementioned outreach staff directly to support more MSFWs being able to benefit from WorkOne services.
- Periodically watching the 2024 Post-Season training available on the WorkOne Staff Portal can refresh and further staff's knowledge on aspects of the Monitor Advocate System such as the ARS and the complaint system.

## NextLevel Jobs/Employer Training Grant (ETG) Monitoring Results

LWDAs receive ETG funds on a reimbursement basis for working with eligible employers that have provided approved training programs to upskill their staff. Upon completion of the ETG funded training, employers must retain trainees for six months from the start of the training. ETG monitoring consists of an interview with Regions' Business Services Representatives to discuss how grant funds are being used and a review of five sample employers' required documentation.

While all 12 Regions received ETG monitoring in PY23, no issues were identified in three Regions and there were 10 Findings/AOCs in nine Regions' reviews. Reviews identified the following issues:

- Supporting documentation not being handled appropriately.
- Lack of dedicated ETG staff.
- Issuing paper checks to employers.
- Missing payroll retention documentation which is necessary to validate that trainees were retained for the required time period following completion of training.

**Effective for PY25 DWD monitoring, Regions will be responsible for uploading a copy of the electronic transfer of funds to employers to validate that payments were received.**

The chart below shows some of the key performance metrics for ETG.

ETG Performance Metrics		
	ETG 5.0/6.0 As of 12/31/24	ETG 7.0 As of 2/28/25
Total Amount Awarded	\$31,129,376.98	\$12,053,500.00
Total Amount Paid	\$30,014,031.90	\$10,045,272.69
Employers Supported	704	392
Trainees	6,033	4,491
Average Wage	\$22.22	\$23.26

### SUGGESTIONS FOR IMPROVEMENT

- Review ETG Manual and become familiar with ETG requirements.
- Outreach to the DWD Employer Engagement Team for support as needed.
- Take advantage of the ETG Regional Teams channel.

## Workforce Program Admin Team Spotlight

In PY24, DWD launched the Workforce Program Administration (PA) Team—a new branch of the Compliance and Policy Division, collectively now referred to as the Program Administration and Oversight (PAO) Division. The PA Team is dedicated to strengthening program oversight, streamlining processes, and supporting Regional offices.

## Why the PA Team Was Created

As workforce programs continue to grow in scope, complexity, and accountability requirements, Regions require more than compliance direction—they need a partner that can help interpret policy, anticipate challenges, and equip them with practical solutions.

The PA Team was established to strengthen DWD's ability to support Regions, promote alignment, and ultimately enhance the quality and impact of workforce services across the state. It institutionalized program administration and centralized key administrative functions for target initiatives including the Senior Community Service and Employment Program (SCSEP), Trade Adjustment and Assistance (TAA), Apprenticeship Building America (ABA) and WIOA Title I.

In short, the PA Team was created because strong administration is fundamental to strong outcomes and has positioned DWD to more effectively bridge state-level priorities with Regional implementation.

## How the PA Team Supports Regions

By engaging with the PA Team, Regions can spend less time navigating administrative requirements and more time focusing on what matters most—serving job seekers and employers.

In PY 2024, the PA Team concentrated on three core areas:

1. **Grant Administration** – Supporting Regions in the effective use of funds, policy alignment, and maximizing resources.
2. **WIOA Title I** – Piloting technical assistance sessions with select Regions to strengthen local program knowledge, to build confidence, and to help Regions address program issues surfaced through monitoring.
3. **Governance and Continuous Improvement** – Partnering with Regions to strengthen oversight structures, improve processes, and share promising practices.

## Looking Ahead

Strong program administration is not only a compliance requirement, but also a value-add for Regions. When Regions partner with the PA Team, they gain access to expertise, tools, and technical assistance that can simplify operations, strengthen outcomes, and ensure vital resources are used to their greatest impact.

The creation of the PA Team reflects DWD's commitment to efficiency, accountability, and strong partnerships with our Regional offices. In the coming year, the PA Team will continue expanding its role as a resource—developing tools, clarifying guidance, and working side-by-side with staff to improve service delivery statewide.

## DWD Policy/Technical Assistance

Throughout PY24 the DWD Policy Team issued a number of guidance documents related to WIOA Title I governance activities, Business Services, Adult Education, Youth, Wagner-Peyser Employment Services, Equal Opportunity and Accessibility Guidance, Data Integrity, Privacy, and Performance Guidance. All policies, technical assistance documents and memos are published on DWD's webpage at: [DWD: Active Policies](#)

It is crucial that Local Areas not only familiarize themselves with DWD guidance but also develop policies and procedures adapting statewide guidance to their local service delivery systems. It is critical that LWDA staff are trained on and understand how to apply this guidance to their day-to-day work.

# Thank You!

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

Contact information for staff contributing to this edition of the YIR is below:

## Program Administration & Oversight

Connie Wray, Associate Chief, [CWray@dwd.in.gov](mailto:CWray@dwd.in.gov)

Christmas Hudgens, Division Director, [CHudgens@dwd.in.gov](mailto:CHudgens@dwd.in.gov)

Zoe Francis, Director of Policy, [ZFrancis@dwd.in.gov](mailto:ZFrancis@dwd.in.gov)

Becky Paul, Director of Monitoring & Quality, [BPaul@dwd.in.gov](mailto:BPaul@dwd.in.gov)

Compliance Team, [oversight@dwd.in.gov](mailto:oversight@dwd.in.gov)

## Fiscal/Admin

Larry Upchurch, Senior Fiscal Monitor, [LUpchurch1@dwd.in.gov](mailto:LUpchurch1@dwd.in.gov)

Juanita Riggs, Fiscal Monitor, [JuRiggs@dwd.in.gov](mailto:JuRiggs@dwd.in.gov)

Shanda Tuttle, Fiscal Monitor, [STuttle1@dwd.in.gov](mailto:STuttle1@dwd.in.gov)

## Program

Stacey DeYoung, Senior Program Monitor, [SDeYoung@dwd.in.gov](mailto:SDeYoung@dwd.in.gov)

Jacki Anderson, Senior Program Monitor, [JAnderson16@dwd.in.gov](mailto:JAnderson16@dwd.in.gov)

## Equal Opportunity

Jennifer Greimann, EO Compliance Specialist, [JGreimann@dwd.in.gov](mailto:JGreimann@dwd.in.gov)

## Governance

Trion Thomas, Senior Compliance Monitor, [TrThomas@dwd.in.gov](mailto:TrThomas@dwd.in.gov)

## Migrant and Seasonal Farm Workers (MSFW)

Joanna Mejia, State Monitor Advocate [JMejia@dwd.in.gov](mailto:JMejia@dwd.in.gov)

## NextLevel Jobs - Employer Training Grant (ETG)

James Hunt, Director of Business Development, [JHunt@dwd.in.gov](mailto:JHunt@dwd.in.gov)