

# Monitoring Year-in-Review Plus

Program Year 2023  
Program Year 2024, Q1 & Q2

## IN THIS ISSUE

[Workforce Innovation &  
Opportunity Act \(WIOA\) Title I](#)

[WIOA Program](#)

[WIOA Equal Opportunity](#)

[WIOA Fiscal/Admin](#)

[WIOA Governance](#)

[Migrant Seasonal Farmworkers  
\(MSFW\)](#)

[MSFW Equity Indicators](#)

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

[NextLevel Jobs/Workforce Ready  
Grant \(WRG\)](#)

[Apprenticeship Building America  
\(ABA\) Grant](#)

[Reemployment Services and  
Eligibility Assessment \(RESEA\)](#)

[Noteworthy Efforts](#)

[DWD Workforce Related Policies](#)

## Welcome!

Welcome to the third edition of the Indiana Department of Workforce Development's (DWD) Year-in-Review (YIR). This year we are calling this document the "YIR Plus", because in addition to sharing outcomes from compliance reviews conducted in Program Year (PY) 2023, it also covers those outcomes from the five reviews that took place the first half of PY2024 (July-Dec 2024).<sup>1</sup> The PY23 YIR Plus includes statewide aggregated compliance review results for all the workforce programs reviewed during DWD's Concurrent Review Process:

- Workforce Innovation & Opportunity Act (WIOA) Title I
  - Service Delivery, Equal Opportunity, Fiscal/Administrative, Governance
- Migrant Seasonal Farmworkers (MSFW)
- NextLevel Jobs/Employer Training Grant (ETG)
- NextLevel Jobs/Workforce Ready Grant (WRG)
- Apprenticeship Building America (ABA) Grant
- Reemployment Services and Eligibility Assessment (RESEA)

The YIR Plus provides DWD's Local Workforce Development Areas (LWDAs, Regions) and their partners a global picture of how the State is administering these programs from a compliance perspective, as review outcomes are from Federal and State required reviews, but also with a lens focused on quality and effectiveness of services delivered. Compliance reviews are conducted by staff from across DWD's Workforce Division. While specific programs' requirements vary, monitoring staff share a common intent to assess how DWD funded programs are impacting their intended participants, whether those are individuals needing job search assistance through WIOA or the MSFW programs, or employers seeking resources to develop Registered Apprenticeship Programs through the ABA Grant or to upskill their current staff using ETG funds.

Statewide monitoring results show the greatest need for improvement is around how case management services are provided. Conducting initial assessments, identifying barriers, determining eligibility, and developing service strategies are the foundation for delivering effective workforce development services. The same types of case management issues are identified across WIOA, MSFW, and RESEA, and the overall quality of case management services varies considerably from one Region to the next. Reviewing Regions' performance metrics also suggests that these are impacted by the quality of case management services. DWD encourages Regions to examine the potential correlation between monitoring outcomes and performance metrics.

At the start of every compliance review we discuss DWD's commitment to promoting continuous quality improvement (CQI). This YIR Plus document is a product of that commitment. Aggregated review outcomes give Regions the opportunity to compare themselves to their peers and to learn

<sup>1</sup> Not all PY24 reports have been issued.

about noteworthy efforts. DWD is in the process of finalizing updated monitoring guidance as another product of DWD's commitment to CQI. This updated guidance outlines both state and local level monitoring expectations.

Based on conversations with all 12 of Indiana's LWDA's over the course of monitoring, it is very apparent that Regions' commitment to supporting the people and employers in its communities is rock solid. We encourage Regions to remember that DWD shares your same commitment to make its programs the best that they can be and is always available to provide technical assistance and help problem solve.

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

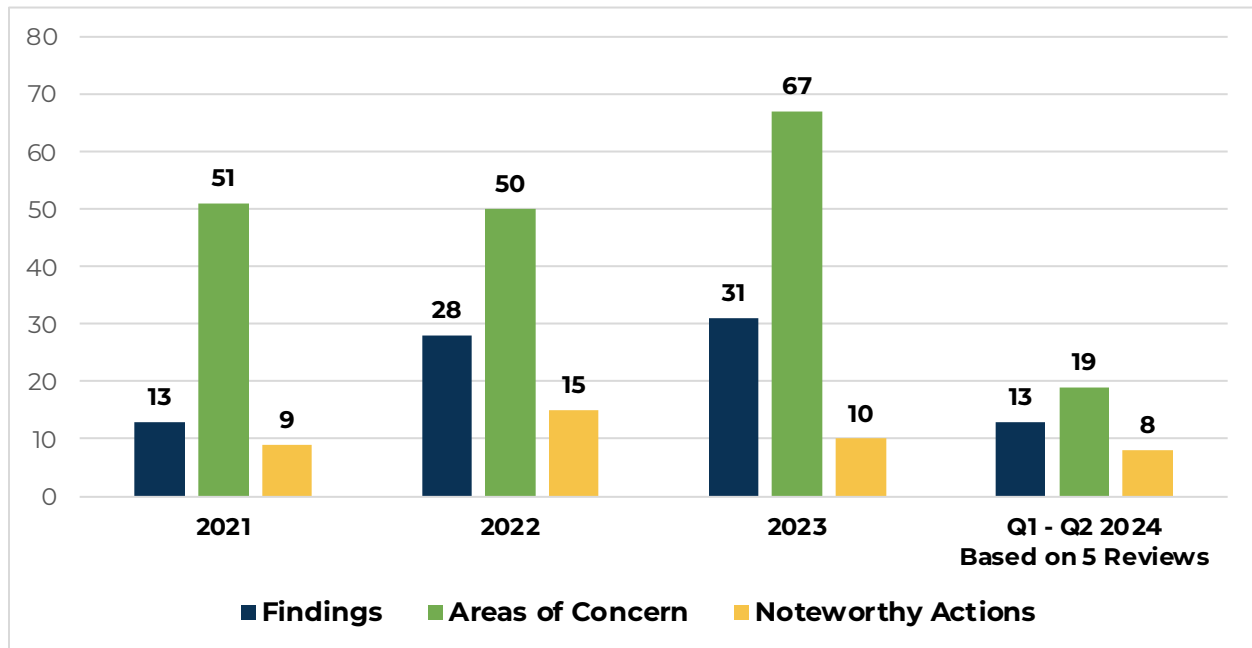
**Findings:** Items identified as non-compliant with federal, state, or local regulations, policies, or procedures shall be classified as Findings. Specific areas of non-compliance are described, and citations of applicable authorities are provided. Detailed, required corrective actions are provided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

### WIOA Title I – Review Outcomes from PY21-PY24, Q2



#### INITIAL OBSERVATIONS:

- There's been a steady increase in Findings and AOCs from PY21 to PY23. Based on the five Regions reviewed so far in PY24, the overall number of Findings and AOCs may decrease in PY24 reviews.
- In PY23 each region received an average of 8 findings and AOCs. Breaking this down further, Regions received an average of 5 AOCs and 3 findings per report.
- 18 Noteworthy Efforts were identified across all of the PY23 reviews and the first half of PY24's reviews

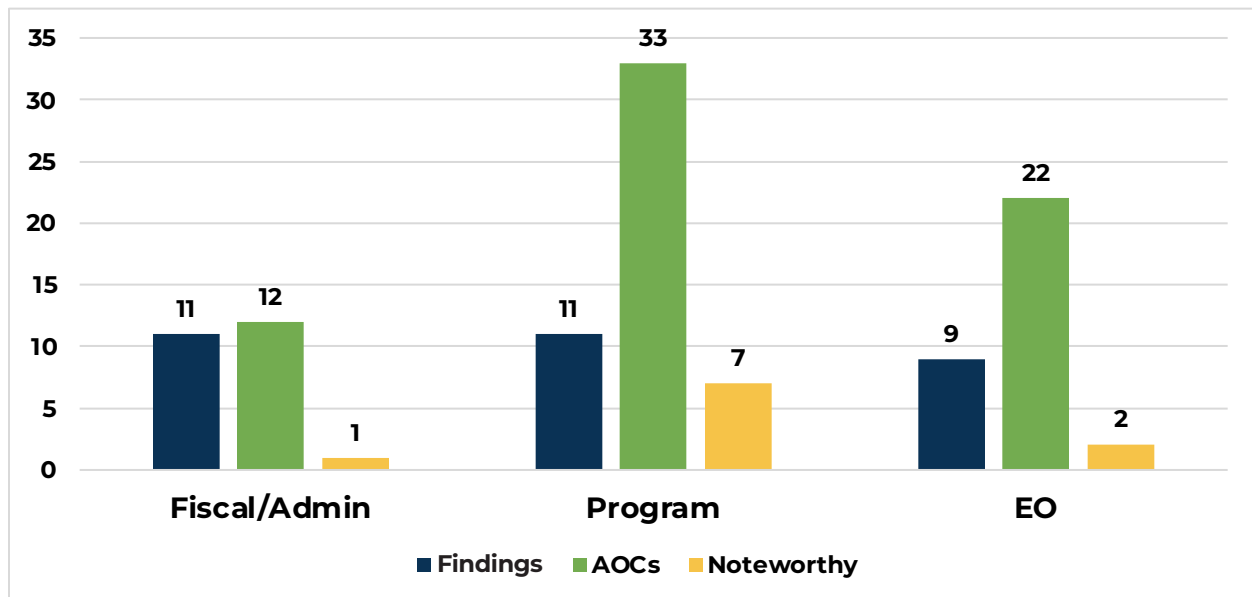
#### WHY THE BIG JUMP IN REVIEW OUTCOMES?

- In PY23 we started to label Repeat Issues in reports. Repeat Issues from PY22 monitoring accounted for the following percentages of Findings/AOCs in PY23 compliance review reports:
  - 42% of Findings (13 out of 31)
  - 21% of AOCs (14 out of 67)
  - Repeat issues were fairly evenly spread across Program, EO, and Fiscal.
- 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 not sufficient to resolve the issue. These issues may be classified as AOCs for a second year in a row based on evidence that a Region is attempting to address the issue. Sometimes it may be a timing issue, e.g., a Region started implementing a new procedure or tool and DWD's

monitoring sample's time period did not align with when that was effective. We want to give Regions credit for the efforts they are making so a repeat AOC is appropriate.

- Similarly, there were findings in PY22 with approved corrective actions, but the PY23 monitoring identified the same issue again. DWD will assess the Region's actions to resolve the issue and determine if the issue should be classified as a Finding again with new required corrective action, or if an AOC would be more appropriate.

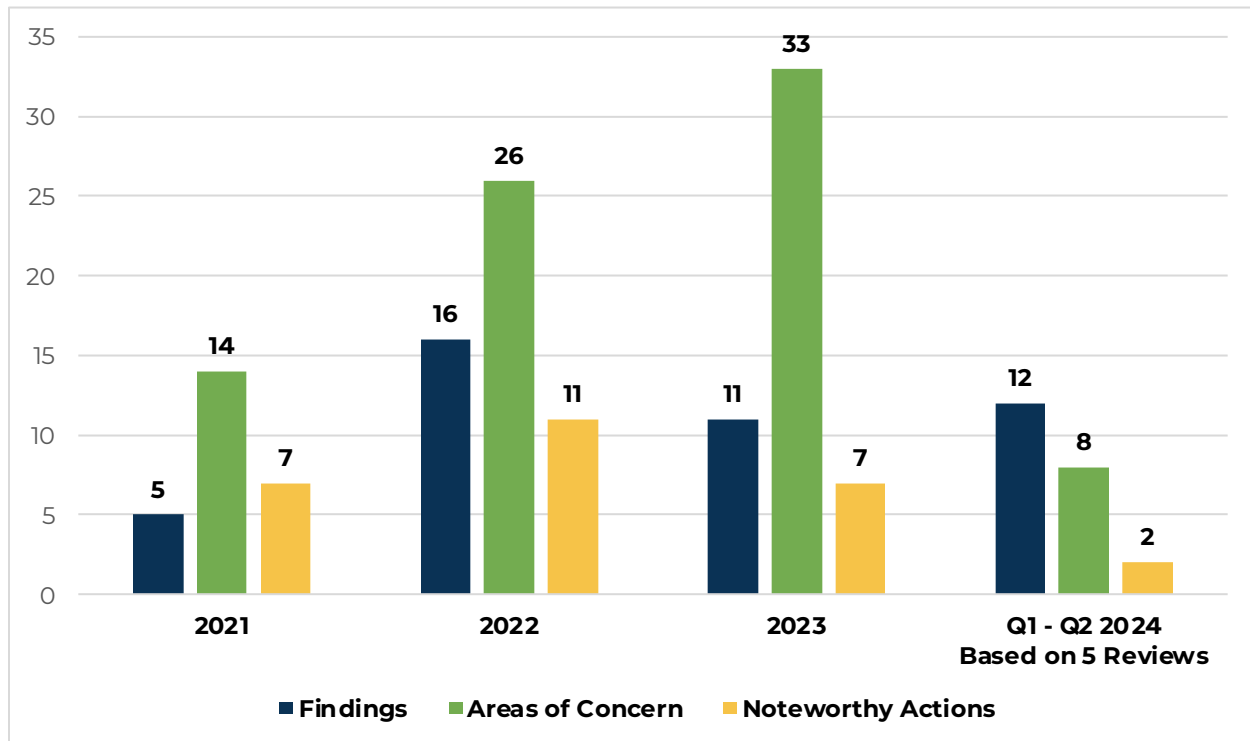
## PY23 WIOA Review Outcomes by Subject



- Program has the most Findings/AOCs, then EO, and then fiscal. At a high level this makes sense because with the participant record reviews, the site visits, the case manager interviews - more Program-related content is covered during monitoring.
- It is interesting to note that Program and Fiscal/Admin had the same number of Findings in PY23's reviews. In addition to compliance kinds of issues, Program reviews assess quality of services which likely contributed to the much greater number of Program-related AOCs.
- EO also has a significant amount of content being analyzed in monitoring reviews.
- While there are fewer numbers of Fiscal Issues, the gravity of these issues is significant and has the potential to impact Program areas. In addition, the Fiscal component of compliance reviews is combined with Administrative, with the bulk of these issues being Governance related.
- Every monitoring interview begins with a Governance Interview with the LWDA's Executive Director which gives a foundation of how the LWDA and the service delivery system are structured. Several governance related documents are reviewed over the course of monitoring that have defined time spans, i.e., Chief Elected Officials Agreements must be updated every five years, Memoranda of Understanding need to be updated every three years, Multiple Role Agreements need to be revisited when new contracts are issued for major roles. Issues not addressed the first time they're identified in monitoring will continue to be cited in future years' compliance review reports.

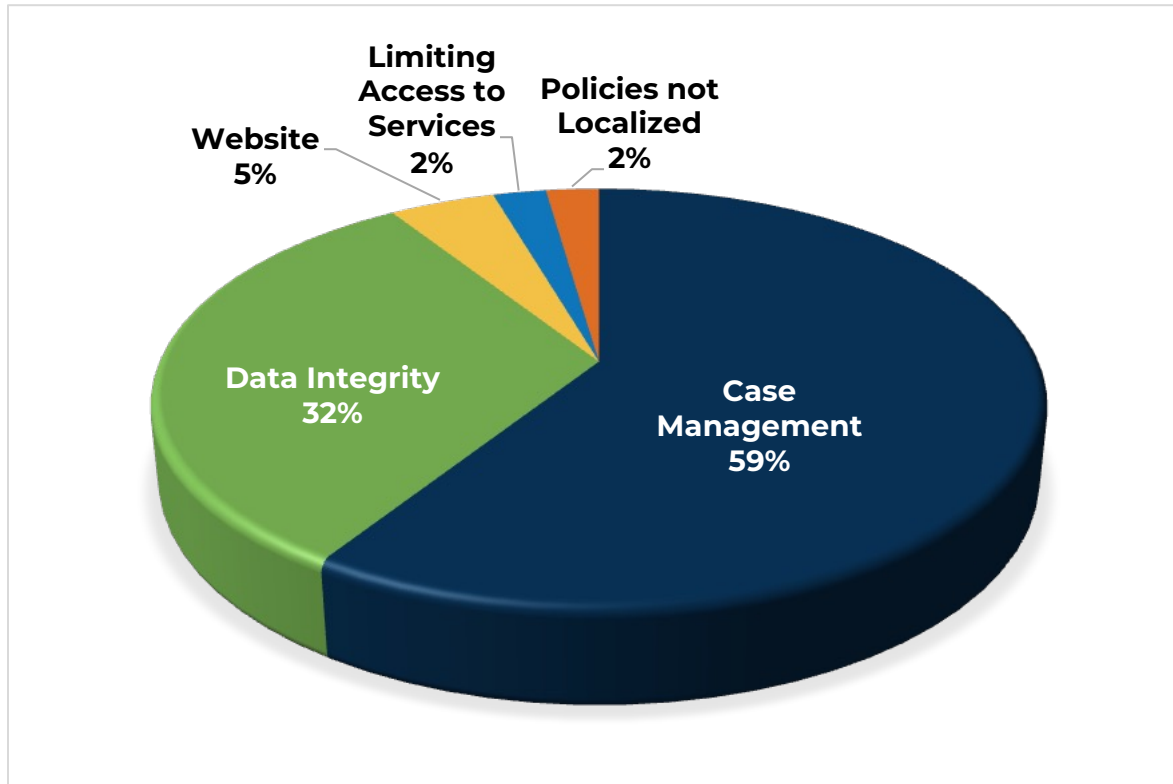
## WIOA PROGRAM MONITORING

### WIOA Program Review Outcomes from PY21-PY24, Q2



- Program issues are included in the “WIOA Title I Service Delivery” section of comprehensive compliance review reports
- WIOA Program-related Findings increased 68% from compliance reviews conducted in PY21 to PY22 but then decreased by 31% from PY22 to PY23. This decrease was based on improvements identified including:
  - Access to Services/Partners/Referrals
  - Case Management – Barriers
  - Case Management – Exit/Follow-Up Services
  - Policies not Localized
  - Priority of Service
  - Websites having accurate info
- It appears that the total number of Program-related Findings for PY24 will increase as thus far, there are 12 Findings based on five Regions’ reviews whereas in PY23 there were 11 Program-related Findings for all 12 Regions’ reviews. This could be due to PY23 Findings that were not fully addressed.
- While there were fewer Findings from PY22 to PY23, the number of AOCs has been steadily increasing. AOCs went from 46% between PY21 to PY22’s reviews and then jumped another 21% from PY22 to PY23’s reviews. This increase was largely due to issues regarding:
  - Case Management – File Management
  - Data Integrity
- PY23 monitoring identified 15 Program-related repeat findings related to Case Management (Barriers, Eligibility/Assessment, File Management) and Data Integrity.
- All of these issues are more fully detailed below with Noteworthy Efforts compiled into a separate section later in this report.

## PY23 WIOA Title I Program Outcomes



### LIMITING ACCESS TO WIOA TITLE I SERVICES

- 2% of WIOA Program related issues identified were related to LWDA practices that appeared to limit participants from being able to access the full scope of services available under WIOA.
- WIOA Title I provides a comprehensive package of services, including individualized employment and support services. Regions should consider how the service delivery process may impact the services participants can access. For example, if all job seekers are only referred to Wagner-Peyser services, they may miss the opportunity to benefit from supportive services only available through WIOA.

### POLICIES NOT LOCALIZED

- 2% of Program-related Findings/AOCs were based on Regions not using DWD Policies to develop their own local policies/procedures.
- U.S. Department of Labor (DOL) and DWD guidance often require Regions to develop their own local policies in order to provide staff instructions for implementing the guidance within Regions' own unique service delivery models.
- Having standardized local policies and procedures helps ensure that all participants receive consistent experiences accessing WorkOne services.

### WEBSITE

- 5% of WIOA Program related Findings/AOCs were due to LWDAs' websites not including updated information.

- Regions use websites to provide practical information about obtaining services to both potential participants and to community organizations who may want to engage with the organization.
- To avoid confusion for individuals seeking assistance, Regions should be conscientious about ensuring all location and contact information is updated, links are working, and identified services remain available.

## DATA INTEGRITY

In PY23 monitoring 32% of WIOA Program related Findings/AOCs were related to Data Integrity and Data Integrity was identified in all five of the reviews conducted in the first half of PY24. These issues include:

- **Contradictory information between the WIOA application, case notes, and supporting documents.** Inconsistent information makes it difficult to validate a participant's needs and whether services were provided. As case managers transition caseloads, inconsistent participant information can create problems for new case managers to learn participants' stories. Care should be taken to ensure that all client data is accurate, complete, and consistent throughout each client's ICC records.
- **Insufficiently documented services delivered.** Case notes entered in Indiana Career Connect (ICC) serve as a detailed record of a participant's progress and validate the services provided. Activities entered in ICC with case notes lacking sufficient information to verify the services provided may negatively impact the integrity of a Region's data.
- **Inaccurately recording Measurable Skill Gains (MSGs) and credentials.** Inaccurately recorded MSGs or credentials can negatively affect a Region's WIOA performance during data validation.

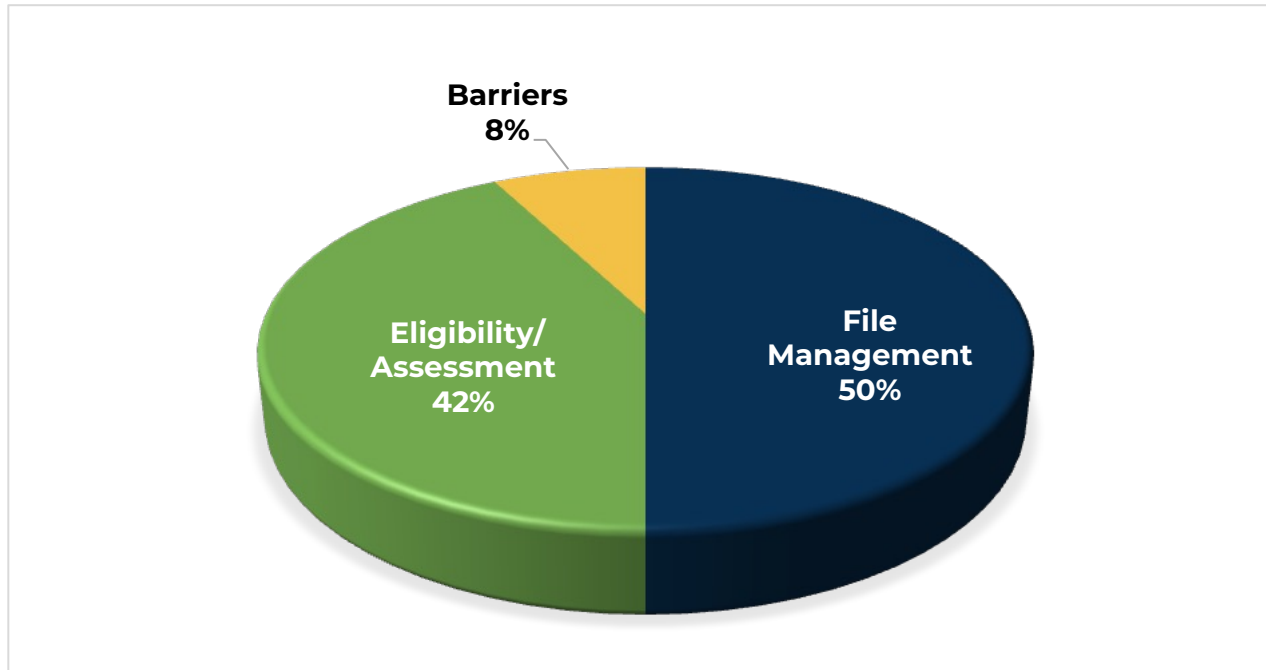
## CASE MANAGEMENT

- 59% of WIOA Program related Findings/AOCs were related to Case Management issues which included:
  - **Eligibility/Assessment,**
  - **Failure to Identify and/or Address Barriers, and**
  - **File Management.**
- This trend has continued into the PY24 reviews with Case Management issues being the most frequently cited Program-related Findings/AOCs.

A lack of or minimal case management could result in inadequate service delivery, poor performance, and lost opportunities for people to access additional services through other programs. Case management issues are more fully detailed below.



## PY23 Program Case Management Issues



### BARRIERS

- In PY23 reviews issues with Barriers not being addressed or being addressed inadequately were the basis of 8% of Case Management related Findings/AOCs. Issues with Barriers were identified in just one of the five reviews conducted in PY24.
- When employment barriers are not addressed through appropriate service strategies, participants are less likely to achieve their education & 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 participants achieving their goals and is one of the most valuable services case managers provide.

### ELIGIBILITY/ASSESSMENT

- PY23 monitoring identified that 42% of Case Management related issues were due to WIOA Eligibility/Initial Assessments. Eligibility/Initial Assessments comprised the second largest area of Case Management related Findings/AOCs.
- **Types of Eligibility Determination problems included:**
  - **Lack of complete/accurate Selective Service Registrations.** In cases where an individual is required to register but did not, adequate documentation establishing that their failure to register was not knowing and willful ([TEGL 11-11, Change 2](#)) must be provided in case notes and as required by local policy. In cases where staff believe the individual may have been exempt from registration, adequate documentation such as immigration records, incarceration history, etc. must be provided.
  - **ICC documentation not supporting 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\(b\)](#). Participant records should always contain clear justification for the provision of services provided. ([TEGL 19-16](#)).

- **WIOA training services are not well-justified in case notes.** In most of these cases, 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-sufficient wage and were noted to have minimal, if any, employment barriers. In instances where participants are utilizing the Workforce Ready Grant or third-party training funds, Regions must have procedures to help staff determine when Wegner-Peyser or WIOA services would be most appropriate.
- **Types of Inadequate Assessment included:**
  - **Lack of documented, in-depth review of education and work history.** Comprehensive reviews are foundational in helping determine potential patterns that may affect individuals' overall employability.
  - **Lack of documentation regarding factors such as a person's living situation, how they are making ends meet, etc.** This information provides key insight into potential employment barriers and other service needs of participants. Failure to utilize specific assessment tools required by the region and document those results may also impact the quality of assessment documentation.

## FILE MANAGEMENT

- File Management issues comprised 50% of all Case Management related Findings/AOCs. File management issues continued to be identified in PY24 reviews. The five compliance reviews DWD conducted the first half of PY24 included lack of documentation as an issue. The most common File Management concerns identified were:
  - **Lack of documentation for supportive services.** Case managers must ensure individuals' needs for supportive services are noted in Individual Employment Plans (IEPs)/Individual Service Strategies (ISS). Additionally, case notes should indicate when necessary supportive services are not available through other programs or that the urgency of the needed service is such that referrals to other resources would delay the provision of the supportive services and create a hardship for the participant. LWDBs are required to maintain documentation in the state's electronic case management system to demonstrate the need and ensure that funds are allowable and used for the intended purpose. ([DWD Policy 2021-02](#).)
  - **Missing documents.** This included documentation needed to verify participant eligibility, Selective Service Registration exemptions, and priority of service which could result in questioned or disallowed costs.
  - **Untimely data entry, system-closed activities.** DWD requires services to be entered into ICC no more than three business days following delivery. Many Regions have their own standards with timelines for data entry which DWD monitoring also holds Regions accountable for following. Accuracy of documentation is potentially jeopardized as time passes.
  - **Failing to properly enter staff-delivered services.** Many of these instances were based on counseling activity codes in ICC with case notes indicating that these were informational only communications.
  - **Vague/non-individualized case notes and IEPs.** These create difficulties in understanding the participant's story. Case notes should be specific to the person, clear, and concise.
  - **General lack of staff contact and services.** Routine contact is necessary for helping individuals meet their employment goals. Many Regions have policies defining the

appropriate frequency of case manager contacts with participants. These policies should balance case manager capacity with the need to support participants to the fullest extent.

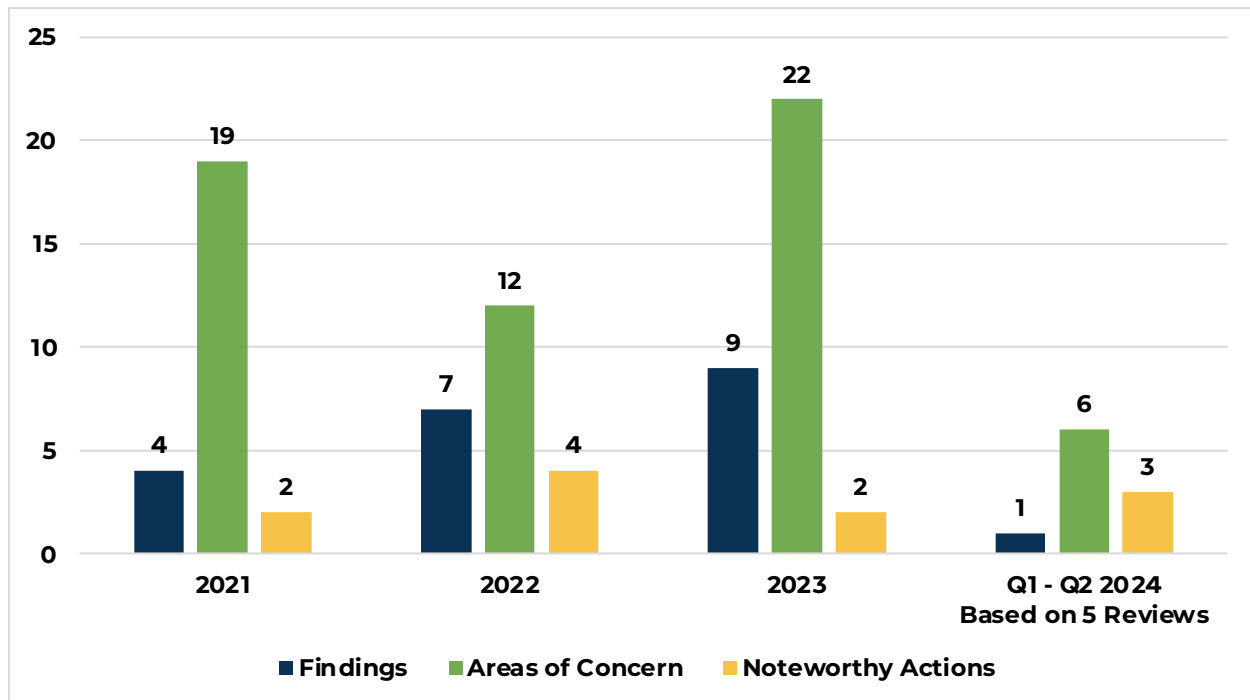
## **SUGGESTIONS FOR IMPROVING PROGRAM MONITORING OUTCOMES:**

- **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 are 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.
- **Contact Your Friendly DWD Compliance Team**
  - The Compliance Team always asks case managers to pull out their cheat sheets, tools, checklists, and other resources they utilize to do their job. The Compliance Team will facilitate Regions sharing case management tools. We will not share any Region's resources without first obtaining the Region's consent.
- **Using 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 ICC Team offer periodic training opportunities. Regions can also submit any questions about ICC resources to the DWD Service Desk.

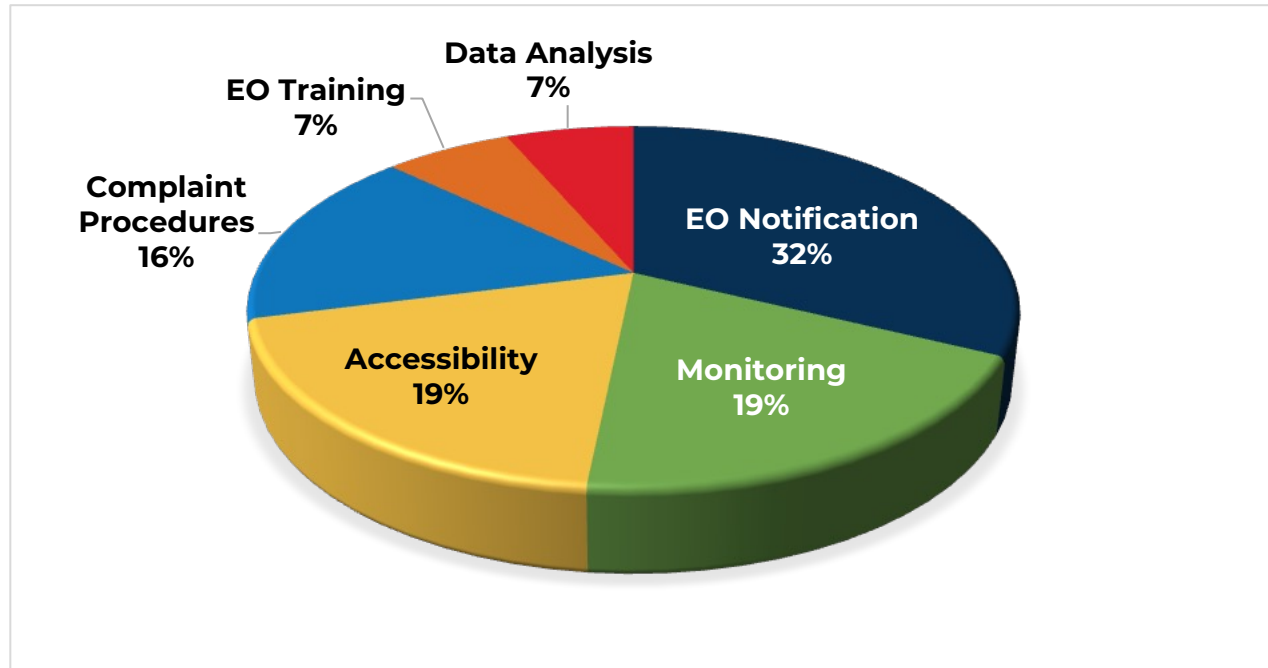
## WIOA EQUAL OPPORTUNITY (EO) MONITORING

### WIOA EO Review Outcomes from PY21-PY24, Q2



- There has been a steady increase in EO-related Findings in compliance review reports every year from PY21 to PY23. This increase was based on issues related to:
  - Complaint Procedures
  - EO Data Analysis
- The number of EO-related AOCs decreased by 36% from PY21 to PY22 and then jumped 45% from PY22-PY23. This increase is tied to issues related to:
  - EO Notices not containing updated contact information
  - EO Tagline not on documentation
  - Lack of EO monitoring
  - Lack of EO training
  - Websites not containing accessibility features
- The same EO-related issues identified in PY23 were identified in the five compliance reviews conducted in the first half of PY24.
- PY23 monitoring identified 6 EO-related repeat outcomes related to Complaint Procedures, EO Monitoring, and EO Notifications.
- All of these issues are more fully detailed below with Noteworthy Efforts compiled into a separate section later in this report.

## PY23 WIOA Equal Opportunity (EO) Outcomes



### COMPLAINT PROCEDURES

- Issues regarding Complaint Procedure comprised 16% of PY23 EO-related Findings/AOCs.
  - Lack of local complaint procedures.** Regions must provide their staff with region-specific procedures for processing discrimination complaints. These procedures must include the required elements under [29 CFR 38.72](#). Regions must ensure these procedures are followed and make them available to the public. In January 2022, DWD published [Technical Assistance 2021-07](#) to assist Regions in developing complete complaint processing procedures that would best serve individuals who choose to file a complaint on the basis of a protected class as defined in [29 CFR 38](#).
  - Complaint procedures missing required elements.** Trends indicate ongoing Findings/AOCs where Regions were not including all required elements of [DWD Technical Assistance 2021-07](#) Complaint Processing Procedures and as referenced in 29 CFR part 38.69 – 38.85. The most common elements missing were the written notice and the alternative dispute resolution process. Including all the elements and timelines will help ensure that the Region can meet the 90-day requirement for issuing the Notice of Final Action letter that is provided to the complainant.

### MONITORING

- In PY23 issues related to EO Monitoring comprised 19% of EO-related Findings/AOCs. These included:
  - Lack of EO monitoring.** Local EO Officers must monitor and investigate their subrecipient service providers that receive WIOA Title I financial assistance to ensure they are not violating their nondiscrimination and equal opportunity obligations ([20 CFR 38.31](#)). Monitoring is an assessment to determine whether the Region's subrecipient(s) have fulfilled their obligations under [Section 188 of WIOA](#) and must take place at least annually.

- **EO monitoring not being documented.** Monitoring identified instances where Regions could not provide a written summary or report of the EO monitoring activities conducted, outcomes, and resolutions.
- **EO monitoring results not being shared with subrecipients.** Results of monitoring should be communicated to subrecipient service providers.

## ACCESSIBILITY

- Accessibility issues comprised 19% of EO-related Findings/AOCs. These included:
  - **Physical and programmatic accessibility.** Regions must ensure physical and programmatic accessibility to the facilities, programs and activities for individuals with disabilities. According to [29 CFR Part 38.15\(a\)](#), Regions must ensure that their communication with participants with disabilities is as effective as their communications with other participants.

Trends indicate that website accessibility could be improved. A resource that Regions can research is the [W3C Web Accessibility Initiative](#) requirements for people with disabilities.

- **Materials not available in different languages.** For languages spoken by a significant portion of the population eligible to be served or likely to be encountered, Programs and Partners must translate vital information in written materials into these languages. Non-English or Limited English Proficient individuals and individuals with disabilities are the highest level of target populations for ensuring equitable access. As this has been the focus of DOL CRC because of ongoing discrimination complaints received nationwide from AJCs DWD has also taken this same approach and has focused more on this area to ensure compliance.

## EO NOTIFICATION

- EO Notification issues comprised 32% of EO-related Findings/AOCs which include:
  - **EO is the Law notifications not posted appropriately.** Regions must communicate to registrants, participants, employees and applicants, professional organizations with agreements with the region, subrecipients, and the public its participation in WIOA Title I activities and that the region does not discriminate ([29 CFR 38.36](#)). This is done through a variety of ways, including the EO Notice on the rights and responsibilities under the EO and nondiscrimination provisions of WIOA, such as the right to file a complaint. The EO is the Law Notice must be posted in prominent places within WorkOne offices, disseminated to participants and employees, and included in group presentations. It should be noted that some Regions included EO notices in their top three languages. For example, one region had EO notices done in English, Spanish, and Burmese.
  - **Not including EO assurance language as required.** The required EO assurance language must be included in contracts, Memoranda of Understanding, On-the-Job Training and work experience contracts, and other agreements per [DWD Policy 2016-09 EO Nondiscrimination Guidance](#) and [29 CFR Part 38.25 – 28.27](#). The trend indicates that the required EO assurance language remains an issue. DWD has recommended that the LDWAs create a process through which the Local EO Officer reviews all contracts, agreements, and MOUs.
  - **Not including EO language as required.** The EO tagline indicates that the WIOA program or activity is an equal opportunity employer/program, and that auxiliary aides and services are available upon request to individuals with disabilities and must be included in all marketing material, including written materials and broadcasts. All EO notifications demonstrate an area for improvement based on comparing PY22 to PY23

data trends. Most notable is the EO notice not being changed when replacing EO Officers which has been mainly due to EO Officer turnover.

## SUGGESTIONS FOR IMPROVING EO MONITORING OUTCOMES:

- 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.

## EQUAL OPPORTUNITY (EO) DATA ANALYSIS

[29 CFR 38.51\(b\)](#) requires a data analysis and subsequent investigation into significant differences in populations receiving services. The Compliance Team utilized 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, disability status, and limited English proficiency (LEP).

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.

In PY23 the analysis was done comparing PY22 Indiana Career Connect (ICC) data for WIOA enrollments to both population labor force and unemployment data. The goal of the analysis was to identify if Indiana's Regions are serving protected groups at the level expected given the demographics of the population within each area. We would expect the numbers of individuals served in an area to be representative of individuals in the community. SD is used to measure how likely an outcome is due to random chance. We 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 an factor(s) influence and in turn is investigated by the Compliance Team for possible discrimination and/or possible reasons for the outlier as well as possible things DWD can do to increase WIOA enrollments for protected groups.

If a category's SD is greater than +2.0, it suggests services were provided significantly less to people in that protected group and therefore indicates that there is a higher probability of possible discrimination.

The 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 SD's for PY2021 data.

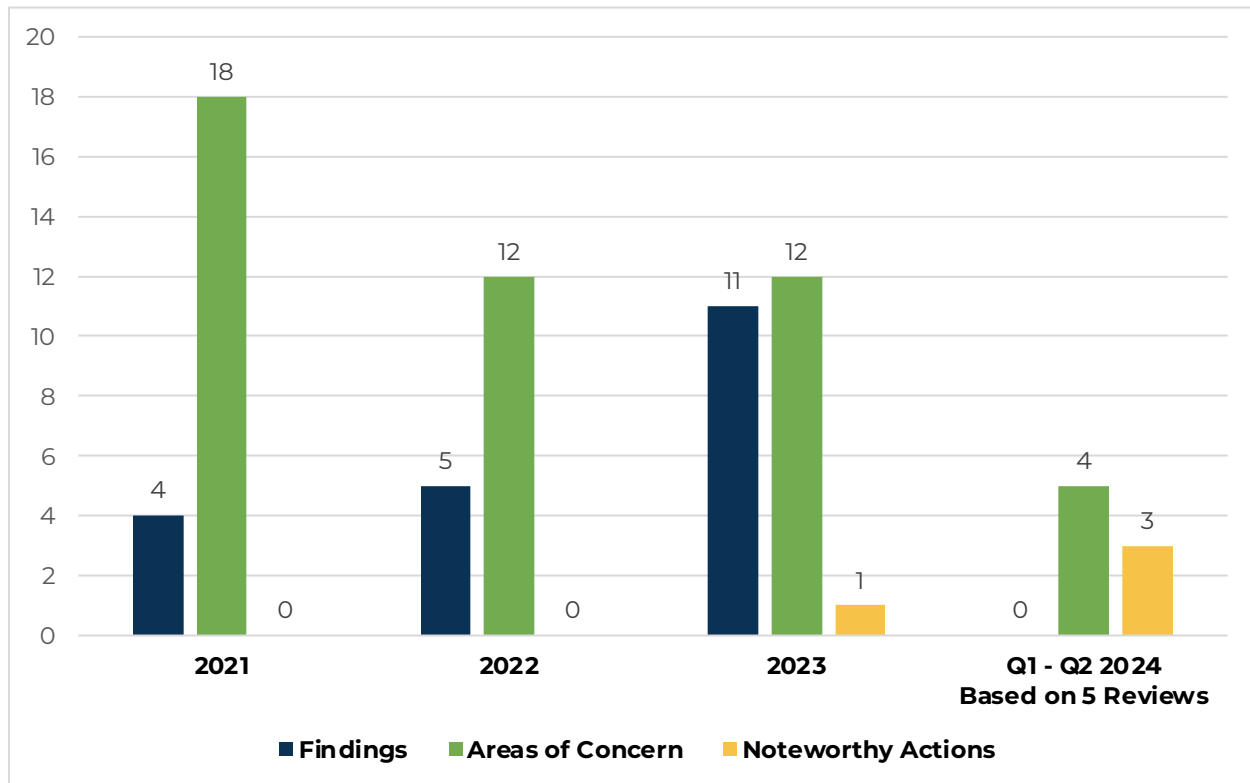
EO Data Analysis for Indiana				
PY2022 Labor Force Data		Category	PY2022 Unemployment Data	
Deviation	Probability of Potential Discrimination		Deviation	Probability of Potential Discrimination
-60.26	No	Black/African American	-21.39	No
<b>3.89</b>	<b>Yes</b>	Other	<b>6.64</b>	<b>Yes</b>
<b>5.05</b>	<b>Yes</b>	Asian	<b>3.58</b>	<b>Yes</b>
-6.04	No	Ethnicity	-1.11	No
<b>21.50</b>	<b>Yes</b>	Age	<b>20.18</b>	<b>Yes</b>
-25.19	No	Disability	1.71	No
-11.81	No	Gender	-10.37	No
1.03	No	LEP*	1.03	No

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



## WIOA FISCAL/ADMIN MONITORING

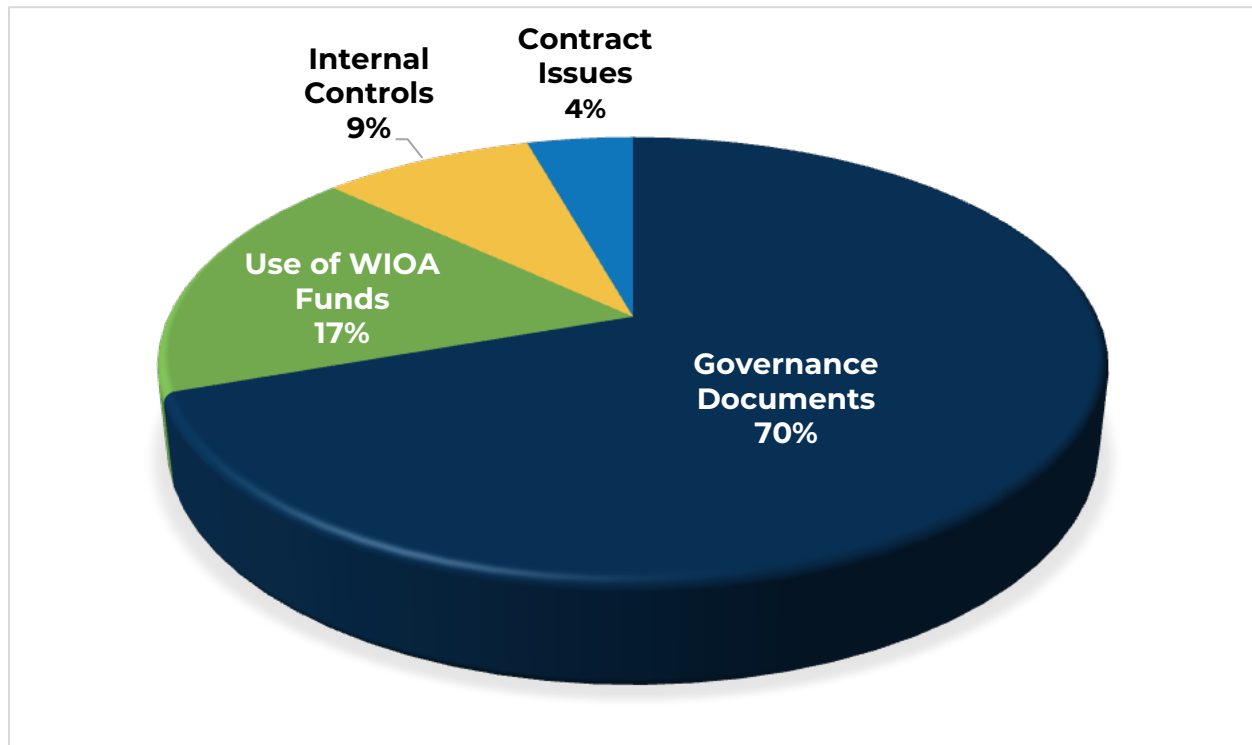
### WIOA Fiscal/Admin Review Outcomes from PY21-PY24, Q2



- WIOA-Fiscal/Admin related Findings increased just slightly from PY21 to PY22 and then increased by 54% from PY22 to PY23. This increase was primarily due to issues with:
  - Chief Elected Officials (CEO) Agreements
  - Infrastructure Funding (IFA) Agreements
  - Lack of Cost Allocation Plans
  - Lack of One-Stop Operator
  - Questionable/Inappropriate Use of WIOA Funds
  - Lack of Subrecipient Monitoring
- PY23 monitoring reviews identified 4 repeat Findings from PY22 related to:
  - CEO Agreement
  - Multiple Roles Agreement (MRA)
  - IFAs
  - Lack of Subrecipient Monitoring
- The number of monitoring reviews with Fiscal/Admin related AOCs decreased by 33% from PY21 to PY22 and then remained consistent with 12 AOCs from PY22 to PY23. The five reviews conducted in the first half of PY24 identified the same issues as the PY23 reviews. These included:
  - Untimely Submission of IFAs
  - Not having Current MOU
  - Use of WIOA Funds

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

## PY23 Fiscal/Admin Outcomes



### CONTRACT ISSUES

- 4% of Fiscal/Admin-related Findings/AOCs were related to Contract Issues including, but not limited to:
  - **Single Audit Not Conducted Timely.** Regions must plan to ensure their independent auditor routinely receives timely, accurate financial statements, so that the Auditor can conduct the audit and produce the single audit report within the required time frame for future years. 2 CFR 200.512).

### WEAK INTERNAL CONTROLS

- 9% of Fiscal/Admin-related Findings/AOCs were related to Regions' Weak Internal Controls which included, but is not limited to:
  - **Outdated Fiscal Handbook**
  - **Lack of policy or procedure(s)** to ensure continued consistent, appropriate, or adequate application of established regulations, policies, and guidelines for maintaining effective internal controls over WIOA Title I funds.

### QUESTIONABLE/INAPPROPRIATE USE OF WIOA FUNDS

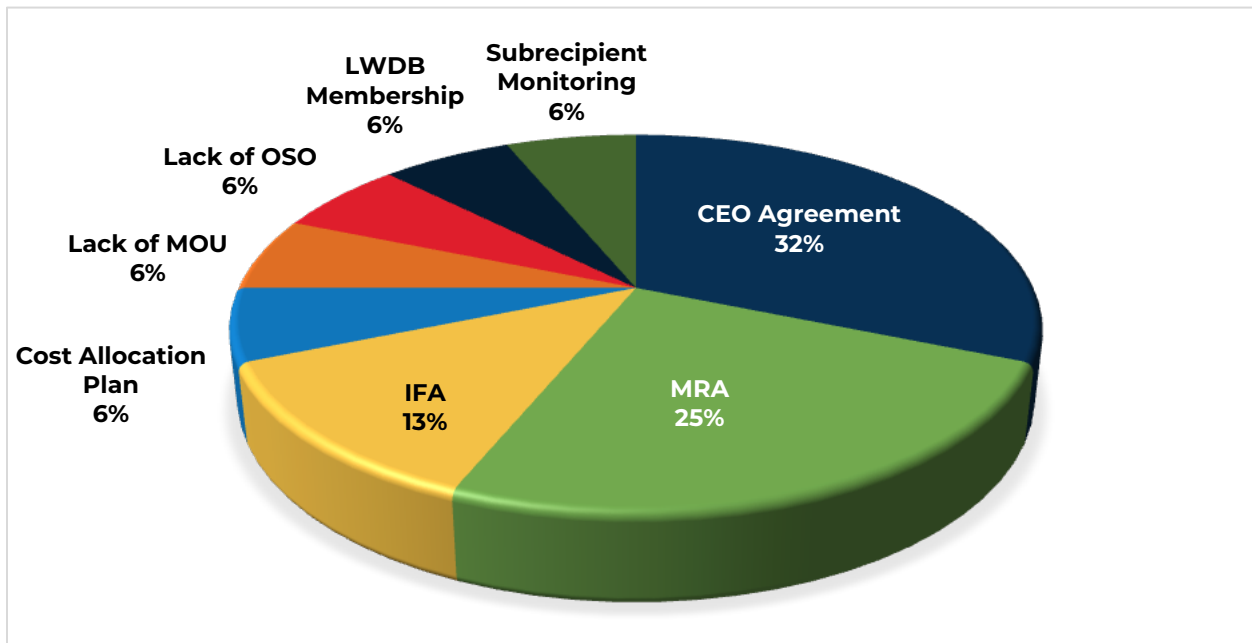
- 17% of Fiscal/Admin-related Findings/AOCs were related to inappropriate and/or questionable use of WIOA funds. These included the following types of examples:
  - Using WIOA funds to provide WorkOne participants coffee and related supplies.

- Credit card and general ledger (GL) expenditures lacking sufficient documentation to trace the expenditures through all applicable GL accounts (expenses, payables, receivables, cash, etc.).
- Questionable management of WIOA resources based on proportion of leadership and client facing staff, declining WIOA enrollments, quality of WIOA services,

## GOVERNANCE DOCUMENTS

- 70% of Fiscal/Admin-Related Findings/AOCs identified in PY23 monitoring were related to lack of or incomplete Governance documents. These will be described in the next section.

### PY23 Fiscal/Admin – Governance Outcomes



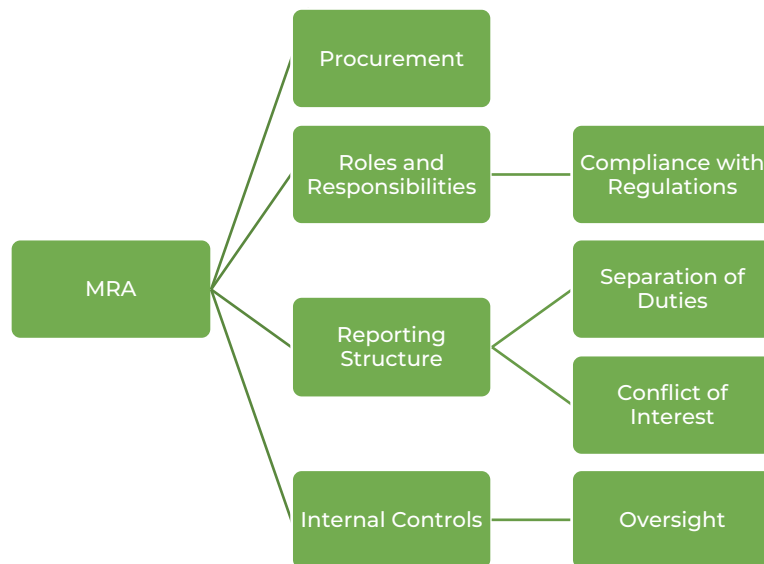
## GOVERNANCE DOCUMENTS

When issues with Governance documents are identified and not addressed, they will be included in the following year's review as an AOC or Finding depending on the Region's efforts to address the issue. Also, it should also be noted that unaddressed Governance issues could impact Program areas. For example, not having a current MOU in place may create uncertainty as to how the Region is interacting with its required partner agencies and how participants are being referred to those providers. Program Monitors will look to validate how referrals are made through the participant record review process and will question case managers about how they make referrals.

- The following types of Governance-related issues identified in PY23 reviews each comprised 6% of the Fiscal/Admin-related Findings/AOCs. These issues included:
  - Untimely submission of IFA reconciliations.
  - Not having a current Cost Allocation Plan.
  - Not having a current MOU.
  - Not having a one-stop operator in place.
  - LWDB membership requirements not met.
  - Subrecipient monitoring reports not available.

## MRAs

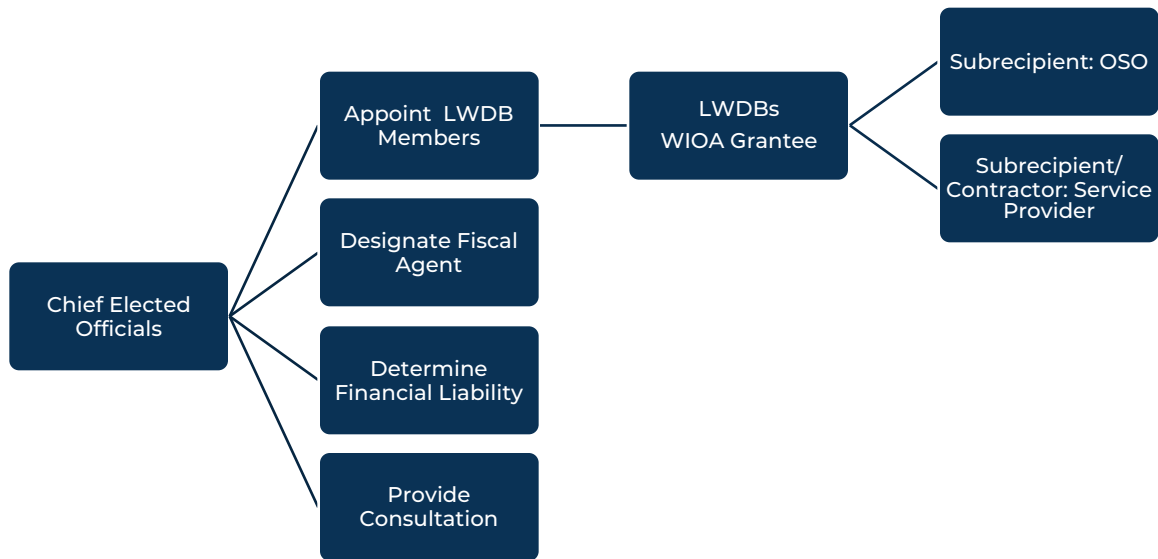
- 25% of Governance-related Finding/AOCs in PY23 reviews were based on issues with MRAs which included:
  - Not being in place when the same entity fulfills more than one major role in the LWDA (i.e., service provider, one-stop operator, fiscal agent, board staff).
  - Not describing the procurement/selection process used to determine the single entity as provider for multiple services (including the years for which the structure would be in place).
  - Not including a clear delineation of roles and management structure depicting necessary separation of duties and firewalls to ensure adequate internal control and mitigate risk of conflicts of interest.
- The illustration below depicts MRA required content:



## CEO AGREEMENTS

- 32% of Governance-related Findings/AOCs in PY23 reviews were based on issues with LWDA's CEO Agreements. The purpose of CEO Agreements, as described in [20 CFR 679.310\(e\)](#) and [DWD Policy 2019-02, Change 3](#), is to describe the roles and responsibilities of the CEOs and to identify the method to be used to determine financial liability amongst the individual jurisdictions. Issues identified in PY23 reviews, and in three of the five reviews conducted thus far in PY24, include Regions' CEO Agreements:
  - Containing outdated CEOs' information.
  - Lacking required population information.
  - Not identifying a Regional CEO or not identifying the current CEO.
  - Not including signatures from all required CEOs or representatives from cities/towns that opted into the Agreement.

As illustrated in the graph below, CEOs impact the implementation of WIOA at the highest local level. CEOs appoint local board members, designate the Fiscal Agent, determine financial liability for misuse of funds, and provide consultation to the Governor, DWD, and the Governor's Workforce Cabinet. DWD grants WIOA funds to the LWDBs to administer WIOA and other workforce development programs. LWDBs select subrecipient one-stop operators and subrecipient/contractor service providers. CEO Agreements lacking the required vital information provide an unstable foundation to effectively support the Region's service delivery system in alignment with the intent and spirit of WIOA.



## SUGGESTIONS FOR IMPROVING FISCAL/ADMIN-GOVERNANCE MONITORING OUTCOMES:

- Regions may want to develop a master timeline that contains expiration dates of 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 new 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 LWDBs' 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 Regions from needing to update documents when staff change.

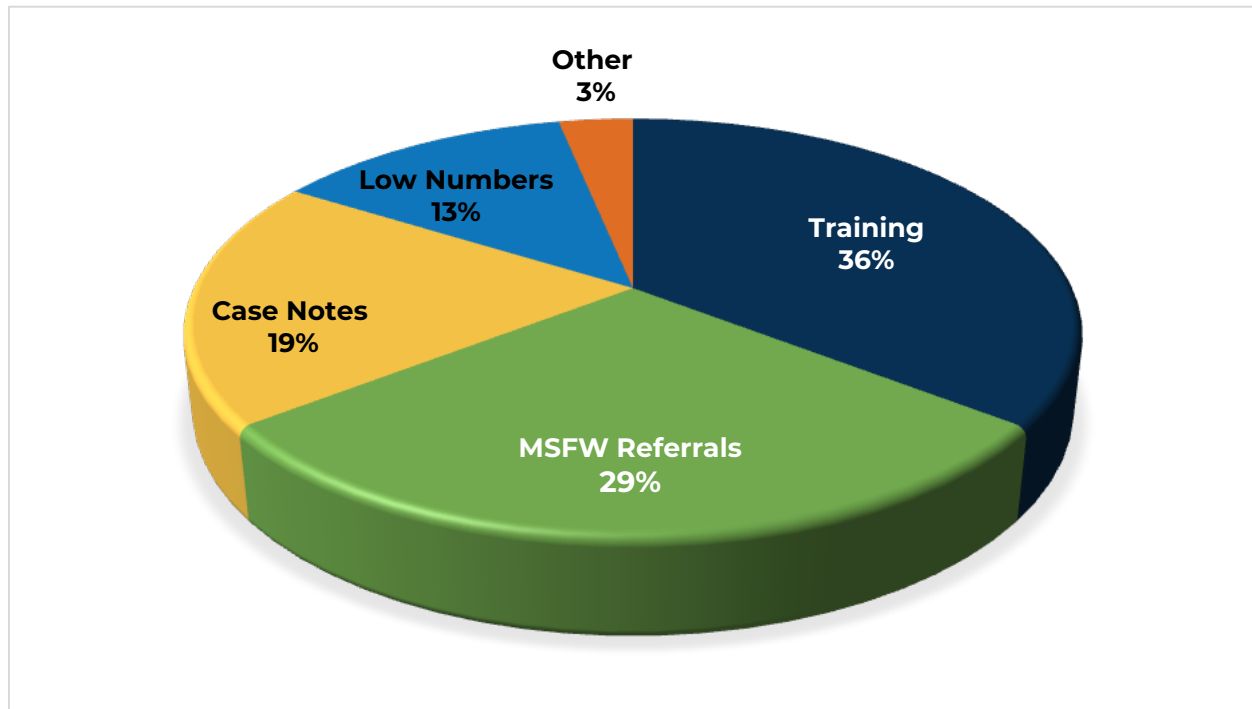
## MIGRANT SEASONAL FARMWORKERS (MSFW) MONITORING<sup>2</sup>

The MSFW program provides an opportunity to engage MSFWs with services available through the WorkOnes and MSFW outreach staff. During PY23 the State Monitor Advocate monitored how Regions provided services to MSFWs and recorded those services in ICC. The State Monitor Advocate reviewed participant files, service codes, and case notes for every MSFW participant statewide. The reviews were conducted on the same timeline as the annual WIOA monitoring reviews that take place in each Region. The State Monitor Advocate met with center managers, business service managers, and employment service staff during office visits in each Region. During monitoring, the State Monitor Advocate reviewed each Region's Self-Monitoring report, all MSFW records in ICC, all active 790A

<sup>2</sup> The contents of this section and associated Areas of Concern are based upon current practices and requirements found in 20 CFR 653.108 and 20 CFR 653.101 prior to the issuance of the Wagner-Peyser Act Staffing Final Rule, which became effective January 23, 2024 and will be fully implemented by January 22, 2026. The Final Rule is accessible at: <https://www.federalregister.gov/documents/2023/11/24/2023-25372/wagner-peyser-act-staffing>. DWD is currently evaluating the merit-staffing revisions for Employment Services staff and how it may impact MSFW service delivery.

job orders, and ensured that all WorkOne offices had required signage displayed such as the MSFW complaint poster. Finally, the State Monitor Advocate interviewed the appropriate Regional staff using the MSFW Monitoring Guide to validate how local staff adhere to the requirements and deliver the required services. Across the state, MSFW monitoring reviews identified 28 AOCs which are discussed below with Noteworthy Efforts compiled into a separate section later in this document.

## PY23 MSFW Outcomes



### LOW NUMBERS OF MSFWs

- **Not conducting appropriate outreach.** 13% of MSFW-related AOCs identified were based on low numbers of MSFWs. Per [20 CFR 653.107\(a\)\(3\)](#), all outreach efforts provided to MSFWs at their workplace, housing or in social areas with high MSFW traffic are to be provided by an outreach staff member who speaks the language of a significant proportion of the Indiana's MSFW population and is either from an MSFW background or has substantial experience in farmworker activities.

### CASE NOTES

- **Lack of MSFW information in case notes.** 19% of MSFW-related AOCs 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. Case notes were identified as an AOC in all five of the reviews conducted the first half of PY24.

### MSFW REFERRALS

- **Not identifying and referring MSFWs that come into WorkOne offices.** 29% of AOCs issued to the Regions 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 the case manager should use when they have provided services to a participant. Often, the State Monitor Advocate observed low numbers of registered and enrolled MSFWs in Regions that have high populations of MSFWs overall. Lack of referrals to the National Farmwork Jobs Program (NFJP) was also identified in two of the five Regions' reviews conducted the first half of PY24.

## TRAINING

- **Lack of training on the Agricultural Recruitment System (ARS).** 23% of AOCs issued were a result of lack of training on the ARS. Although all Regions are making an effort to promote agricultural 790A's for agricultural job/clearance orders, monitoring results showed that many Regions did not understand the full benefits of using the ARS. Lack of ARS training was also identified in two of the five Regions' reviews conducted the first half of PY24.
- **Lack of training on the complaint system.** 13% of AOCs issued to the Regions were due to lack of training on the complaint system. All Regions need to know the importance of the complaint system as well as the difference between a complaint and apparent violation. In multiple reviews, Regions were unable to differentiate between a complaint and an apparent violation. The lack of complaints statewide is not necessarily a positive indicator, as this could be a result of MSFWs not realizing that they can submit complaints if their employers are violating labor laws.

**For monitoring reviews conducted the first half of PY24, MSFW monitoring identified other issues including:**

- Expired job/clearance orders were either in Regions' MSFW binders or posted in WorkOne offices in three of the five Regions' reviews.
- Job orders containing employer information was identified in two Regions' reviews.

## SUGGESTIONS FOR IMPROVING MSFW MONITORING OUTCOMES:

- When agriculture jobs are advertised through job fairs or the WorkOne Offices, it increases the likelihood that domestic workers will have access to employment with sustainable wages. Because domestic workers take these jobs, the State Monitor Advocate can conduct field checks and 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.
- All Regions should refer to [DWD Policy 2022-20](#) and [ETA Form 8429](#) and consider developing a system to ensure that all complaints are entered timely into the MSFW complaint and apparent violation log that is submitted to the State Monitor Advocate every quarter.
- Improving efforts to identify and document MSFWs would assist the Regions in serving 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.
- Regions should reach out to the DWD MSFW Team for best practices in providing MSFWs with services and tools that can be used to document the services provided to MSFWs.
- Get to know or continue getting to know the NFJP partner, Proteus Inc., to refer/co-enroll MSFW participants and learn how to accurately use ICC codes and case note the services provided to participants.
- Get to know your Region's DWD MSFW Outreach Workers. DWD has hired 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 your region is aware of MSFWs in need of outreach services, please contact the aforementioned outreach staff directly. Additional collaboration between DWD's outreach staff and Regional staff will also allow more MSFWs to benefit from WorkOne services.

- Regions may want to consider having staff periodically watch the 2024 Post-Season training available on the WorkOne Staff Portal to refresh and further their knowledge on aspects of the Monitor Advocate System such as the ARS and the complaint system.

## EQUITY INDICATORS

Per [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.

Statewide MSFW Service Level Indicator Report PY23 July 2023 – June 2024					
	1–Referred to Jobs	2–Provided with a Service	3–Referred to Supportive Services	*4–Provided with Career Guidance	*5–Job Development Contacts
MSFWs	38.71%	98.92%	22.58%	41.94%	18.28%
NON MSFWs	14.86%	97.27%	7.15%	36.85%	10.88%
Service Level Percentages	2.60%	1.01%	3.15%	1.13%	1.68%
Achieved Equity	YES	YES	YES	YES	YES

\*Data retrieved from Performance & Quality Unit

## NEXTLEVEL JOBS/EMPLOYER TRAINING GRANT (ETG) MONITORING

LWDAs receive ETG funds on a reimbursement basis for working with eligible employers that have provided approved training programs to upskill their staff. ETG funded training has a six month trainee retention period which begins on the trainee's first day of 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 was one Finding and nine AOCs in nine Regions' reviews. Reviews with a Finding/AOC identified the following issues:

- Supporting documentation not being handled appropriately.
- Lack of dedicated staff.
- Issuing paper checks to employers.
- In the five reviews conducted the first half of PY24, one Region's review identified one AOC based on missing payroll retention documentation. This documentation is necessary to validate that trainees were retained for the required time period following completion of training.



**Regions should be aware of upcoming changes for ETG 8.0:**

- Regions will be responsible for uploading a copy of the ACH transfer of funds to validate that employers received payment.

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

ETG Performance Metrics As of 12/31/2024		
	ETG 5.0/6.0	ETG 7.0
Total Amount Awarded	\$31,129,376.98	\$12,053,500.00
Total Amount Paid	\$30,011,545.28	\$6,360,118.59
Employers Supported	704	314
Trainees	6,033	2,753
Average Wage	\$22.22	\$23.44

**SUGGESTIONS FOR IMPROVING ETG MONITORING OUTCOMES:**

- 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.

## NEXTLEVEL JOBS/WORKFORCE READY GRANT (WRG) MONITORING

The NextLevel Jobs Workforce Ready Grant (WRG) covers tuition and fees for individuals interested in pursuing a certification from a qualified certificate program in Indiana. Pursuant to [Indiana Code 21-12-8-12](#), qualifying certificate programs must teach toward a 4 or 5 flame (in demand) occupation in one of Indiana's high priority industries: Advanced Manufacturing, Building & Construction, Health & Life Sciences, IT & Business Services, Transportation & Logistics and Childcare).

Training providers use the WRG portal to monitor, update and invoice student records which are then automatically uploaded into the CRM. The WRG portal is also used to load proof of credentials earned by students. Appropriate WRG representatives ensure the accuracy of student data entered into the CRM.

Monitoring consists of interviews with Regional representatives and a random sampling of ten Regional student files. The files are reviewed for invoice status, proof of credential earned, and the signed Rights and Responsibilities form. Additionally, credential and completion outcomes are reviewed for compliance with grant standards.

PY23 WRG monitoring identified nine AOCs across the 12 Regions' reviews. Issues identified included:

- Invoice status.** 22% of the AOCs identified were based on paid invoices still being in accounting review status. This was also an AOC in one of the five Regions' reviews conducted in PY24.
- Documentation Issues.** 77% of the AOCs were based on poor documentation. This was also an AOC in one of the five reviews conducted the first half of PY24. Issues included:
  - Missing proof of the credential earned by the student.
  - Missing signed Rights and Responsibilities forms.
  - Inaccurate student documentation that showed the student earning a Certificate of Completion, not the required industry certification credential.

- Invoices not adequately updated and in incorrect status in the CRM.
- Student status not adequately updated/incorrect status in the CRM. This was also an issue identified in one Region's PY24 review.

**Upcoming Changes for WRG:**

- New performance metric for employment and wages.

**WRG Year End Data:**

- The NextLevel Jobs/WRG total Regional award for the Workforce Ready Grant was \$4,000,000, which was then allocated to Regions to serve a planned 1,269 students.
- The WRG Grant served **1,120** students in the program year **2023–2024**.
- Completion percentage = 88%
- Credential percentage = 76%
- Total Grant expenditure = \$5,031,905
- Average cost per student = \$4,492.77

**The Five Most Earned Credentials:**

- Commercial Driver's License A (CDL A)
- Certified Clinical Medical Assistant (CCMA)
- Introduction to Gas Metal Arc Welding (GMAW)
- Certified Professional Coder (CPC)
- American Welding Society (AWS) Certified Welder

**Trainings per Industry (credentials awarded per industry):**

- Transportation & Logistics (**667** total credentials awarded)
  - CDL A
  - Commercial Driver's License B (CDL B)
- Health Sciences (**275** total credentials awarded)
  - Certified Clinical Medical Assistant (CCMA)
  - Certified Professional Coder (CPC)
  - EMT by the National Registry of Emergency Medic
  - Limited Certification in Dental X-Ray Procedures License
  - Certified Phlebotomy Technician (CPT)
- Advanced Manufacturing (**109** total credentials awarded)
  - Introduction to Gas Metal Arc Welding (GMAW)
  - American Welding Society Certified Welder
  - AWS and 3G Carbon Steel
  - Machining Level I – CNC Mill Operations
  - Introduction to Shielded Metal Arc Welding (SMAW)
- IT/Business Services (**44** total credentials awarded)
  - Comp TIA A+
  - Comp TIA A+, Comp TIA Strada IT Fundamentals
  - Comp TIA A+, Comp TIA IT Fundamentals
  - Comp TIA Network+
  - Comp TIA Security+
- Building and Construction (**25** total credentials awarded)
  - EPA 608
  - NCCER – Electrical – Level 1
  - NCCER – Carpentry – Level 1
  - NCCER – HVAC – Level 1
  - Residential Wireman Apprenticeship

**SUGGESTIONS FOR IMPROVING WRG MONITORING OUTCOMES:**

- Routinely check the status of invoices as an independent oversight activity.
- Routinely check student status as an independent oversight activity to ensure all available funds can be utilized.
- Regularly meet with providers to ensure an understanding of WRG requirements.
- Routinely check CRM and ICC so training providers can stay apprised for all issues or missing information that is needed, and for Regions to be able to track their grant performance.

## APPRENTICESHIP BUILDING AMERICA (ABA) GRANT MONITORING

Indiana was awarded the ABA Grant for \$3,907,725 in July 2022, and funds were cleared in 2023. Of this amount, \$3,439,500 (representing 85.99% of the total) was distributed among eleven of Indiana's Regions. During PY23 the Office of Work-Based Learning and Apprenticeship (OWBLA) conducted a review of the eleven LWDBs that accepted ABA Grant funds and identified AOCs in all of them. All issues are discussed below with Noteworthy Efforts compiled into a separate section later in this document.

PY24 monitoring identified the same issues with low grant expenditures and participants, and these have been cited in all five of the Regions' reviews conducted thus far. The grant performance issue has been cited as both a Finding and an AOC in these reviews. In PY24 DOL conducted a review of the ABA Grant which resulted in a Finding for the state due to low expenditures. DWD was required to submit corrective action to DOL describing its strategies for expending these funds.

While the Regions are making progress, their ability to meet the ABA grant's goals remains at risk due to enrollment delays, low expenditures, and administrative challenges. OWBLA's role in providing ongoing technical assistance and monitoring will be essential to overcoming these hurdles. By adopting the recommended strategies, Regions can improve their performance, maximize the impact of their grant activities, and better serve the needs of participants and employers alike.

The monitoring reviews revealed a recurring pattern of challenges and opportunities across the Regions implementing the ABA grant. While no formal findings of significant mismanagement were identified, the progress toward achieving the grant's goals has been uneven. Many Regions are struggling with delays in enrolling participants and expanding funds, raising concerns about their ability to meet performance milestones by the end of the grant period.

**AOCs were based on the following issues:**

- **Low Enrollments and Expenditures:**
  - Regions often fall behind projected enrollment and expenditure targets, risking underperformance and inability to meet grant goals by the period's end.
- **Administrative Challenges:**
  - Miscommunication and system mismanagement.
  - Examples:
    - ICC enrollment issues in Region C delayed grant execution and reporting.
- **Lack of Pre-Apprenticeship Programs:**
  - Many Regions struggled to establish and develop pre-apprenticeship cohorts essential for transitioning participants into RAPs.

- **Employer Engagement:**
  - Although there are efforts to engage employers, some Regions lack clear strategies to scale partnerships or expand RAPs effectively.

#### SUGGESTIONS FOR IMPROVING ABA GRANT MONITORING OUTCOMES:

To address the identified challenges, Regions should adopt a targeted strategy leveraging OWBLA initiatives and improving internal processes:

- **Strengthen Self-Monitoring:** Regions must implement robust internal controls to track enrollments and expenditures, aligning performance with milestones as required by 2 CFR 200.303(a). Routine monitoring and early adjustments will prevent delays.
- **Enhance Employer Engagement:** Utilize blended funding opportunities to focus on industries with high apprenticeship potential and align efforts with DWD's Employer Training Grant to attract more partners.
- **Expand Technical Assistance:** Regions should capitalize on OWBLA's workshops and best practices for administrative and grant compliance. Programs like the Apprenticeship Accelerator can streamline RAP creation and improve performance.
- **Develop Pre-Apprenticeship Pathways:** Build on successful models, such as a Plumbers and Steamfitters program, to create seamless transitions into RAPs. OWBLA can guide Regions by fostering employer partnerships and sharing funding strategies.
- **Improve Administrative Oversight:** Ensure accurate management of systems and timely reporting through OWBLA's technical assistance and quarterly performance reviews.
- **Address the Barriers and Challenges:** Regions should utilize the following processes and initiatives that OWBLA has developed to help support this and future apprenticeship grants:
  - OWBLA established the Resources SharePoint, which houses resources for promoting apprenticeships including online marketing templates, trainings, updated policy and forms and other essential resources in a timely manner: [DWD OWBLAs Resource Site - RESEARCH & DESIGN \(sharepoint.com\)](#)
  - OWBLA regularly hosts office hours for statewide apprenticeship partners, including LWDAs, to provide technical assistance, share best practices and facilitate discussion around grants, apprenticeship, and outreach opportunities. Please contact [wbl@dwd.in.gov](mailto:wbl@dwd.in.gov) if you'd like to participate.
  - OWBLA created [DWD Technical Assistance 2022-10, Change 1 Indiana Career Connect Data Entry for DOL Apprenticeship Grants](#) to assist LWDAs to track client apprenticeship information accurately in ICC. OWBLA provided training and technical assistance on this guidance. Links to training and materials are available on the DWD OWBLA Resource Site referenced above.
  - The Indiana Eligible Training Provider List (ETPL) application process has been streamlined making it more efficient for employers to register their RAPs. More details are available in the [DWD Technical Assistance 2020-17, Change 1 WIOA INTraining and ETPL Procedural Guidance](#).
  - A portal was developed for intermediaries and employers to submit information for pre-apprenticeship certification and once certified, the portal will serve as a data collection site for pre-apprenticeship.
  - Effective for PY23, OWBLA is monitoring LWDAs' implementation of the Apprenticeship Building America (ABA) Grant. This process includes conducting one-on-one interviews, reviewing materials LWDAs submit in advance of the monitoring visit, and developing a report of review outcomes. The list of LWDAs' ABA documents needed for monitoring has been incorporated into the Compliance Team's [Pre-Monitoring Doc Request spreadsheet](#) on the ABA tab. Incorporating monitoring into its oversight activities enables OWBLA to provide more targeted technical assistance to support LWDAs as needed.

- The Apprenticeship Indiana Institute was launched in 2024 offering free Registered Apprenticeship Basics, Building, Launching and Management to all LWDA staff. In-person training occurs quarterly throughout the year.
- The ABA Grant Manager sends bi-weekly reports on reporting errors to LWDAs for data correction and to ensure consistent quality of work.
- OWBLA offers additional 1-on-1 meetings with subgrantees to discuss strategy and progress.
- Potential partner leads are provided bi-yearly to LWDAs on existing and new apprenticeships for potential funding.

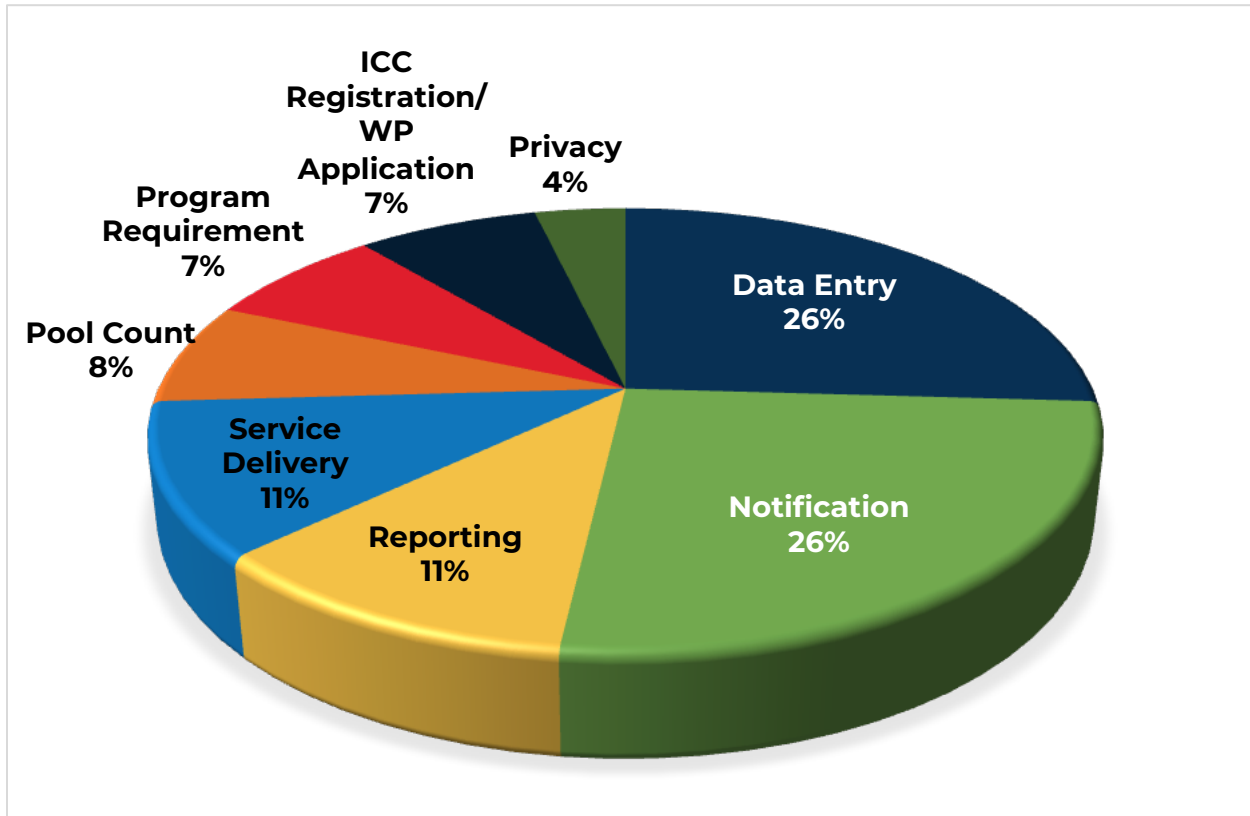
## REEMPLOYMENT SERVICES AND ELIGIBILITY ASSESSMENT (RESEA) MONITORING

RESEA provides an opportunity to engage Unemployment Insurance (UI) claimants and acquaint them with services available through the WorkOne offices to support timely reemployment. DWD is currently redesigning how Wagner-Peyser and RESEA services are provided. The Employment Services Innovation (ESI) Framework is transitioning the delivery of RESEA services to DWD staff. Pilot Regions will test new business processes and technology enhancements to help identify early promising practices. However, results from RESEA's PY23 monitoring reviews of Regions' implementation of the RESEA program are being shared here.

RESEA monitoring reviewed how Regions implemented the RESEA Program, how services were delivered, and timely data entered into ICC. The review consisted of 82 randomly selected participant files spanning seven Regions based on the RESEA program year 2023. ICC was utilized to review participant files, weekly pool counts, event calendars, service codes, and case notes. The RESEA Director met with Regional RESEA leadership through on-site office visits and via Teams. During these visits, the RESEA Director attended the Initial Orientation/1:1 Interviews, 10-week Follow-Up, and Sub RESEA events to observe how the local RESEA staff adhere to programmatic requirements and deliver required services. The outcomes below are based on a combination of participant files, on-site/Teams visits, and information gathered from ICC.

PY23 RESEA monitoring was conducted in seven Regions and identified 8 Findings and 19 AOCs with Noteworthy Efforts compiled into a separate section later in this document.

## PY23 RESEA Outcomes



### Areas Needing Attention:

- **Privacy.** 4% of RESEA issues identified were based on the lack of protection of participants' Personally Identifiable Information (PII).
- **Program Requirements.** 7% of RESEA issues identified had to do with region prefilling IRPs instead of working with participants to develop these together.
- **ICC Registration/WP Applications.** 7% of RESEA issues identified during monitoring had to do with missing, incorrect/incomplete (full) WP Applications and/or ICC Registrations.
- **Pool Count.** 8% of the RESEA related issues identified in reviews were based on mismanaged pool counts for timely scheduling/rescheduling participants. Not providing timely reschedules for participants with existing UI holds or denials due to Regional capacity issues may result in invalid denials.
- **Service Delivery.** 11% of the RESEA-related issues identified in reviews were based on improper IRP processes including missing, prefilled/incomplete forms, and improper goals/assignments based on individual need.
- **Reporting (UI Feedback Loop).** 11% of the RESEA-related issues identified were based on untimely reporting through the UI adjudication feedback loop. Failure to report resulted in improper payments/overpayments or delayed requalification for benefits.
- **Data Entry.** 26% of RESEA-related issues identified in reviews were due to Data Entry issues.
  - Lack of federal and state required details for service delivery process in case notes. This also included late data entry without case note explaining the reason for late entry.

- **Notification.** 26% of RESEA-related issues identified in reviews were due to improper notifications which included:
  - Missing RESEA letters/Babel notices in claimant ICC Documents folder,
  - Late mailing/missing required advance notice without documenting the reason or alternate notification processes utilized due to quick reschedules.

## PY23 NOTEWORTHY EFFORTS

Below is a comprehensive list of all the Noteworthy Efforts that have appeared in PY23 and PY24 through Q2 compliance review reports. 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.

### WIOA Program

**Sector Partnerships** – One Region established a very successful sector partnership with a local healthcare organization to help meet the need for skilled medical professionals in the region. Business Service Representatives' existing relationships with employers, chambers of commerce, and economic development organizations in the region have made the WorkOne system a known source for talent and training resources. When the Region received an inquiry concerning a dire need for Certified Clinical Medical Assistants (CCMAs), it was able to call on educational partners to assist with customizing a curriculum that would fit the needs of the healthcare organization. Regional staff assisted with recruitment, financial assistance (WIOA and private funding), arranged clinical opportunities, job placement services, and provided case management services for students attending training.

**Leadership Succession Planning** – A Regional Workforce Board began succession planning immediately upon receiving notice of the long-term Board staff CEO plan to retire at the end of the current program year. The Succession Milestone Plan was developed and includes:

- Timelines to identify and recruit potential candidates, conduct interviews, and select a new CEO and other leadership positions.
- An updated job description reflecting the current workforce development system and anticipates changes that may be on the horizon.
- A clear transition plan for short-term, long-term or permanent absence.
- Criteria for the talent search.
- Preparation of interview questions.
- Setting up the interview process and developing a scoring matrix.
- Development of a new hire transition phase.

The Board's goals included ensuring a smooth transition with as little upheaval as possible, maintaining long-time partnerships with local businesses, community organizations, civic leaders, and other entities with a stake in workforce development, and developing more partnerships and programs to keep up with ever-changing economic conditions and technological innovations.

**Support for New Technology and High Demand Business Sectors in the Local Economy** - The LWDA has identified and secured funding designated for two important business sectors in the local area that are either facing major technological changes or a critical shortage of workers. Both grants provide a tremendous benefit to the local area by ensuring local workers avoid becoming victims of obsolete technology, plant closures, and helping fill a critical shortage of staff in the healthcare industry.

**Outreach to Populations with Significant Barriers to Employment** – One Region has used social media to increase outreach to specific populations and advertise opportunities targeted at helping address common barriers to employment. These include Adults Over Age 55, Justice-involved Individuals, and



Youth. In addition to the specific events mentioned above, the Region uses social media to promote other services likely to benefit these populations that are available at any time through WorkOne offices. The Region's Facebook page also contains many posts about upcoming events, job fairs, and partner services. Expanding these types of posts to other social media sites will assist in reaching a wider audience.

**Braiding Funding to Best Serve Customers** – One Region has been successful in stretching its WIOA resources by securing additional funding sources to serve its communities more effectively. Ongoing training is provided to ensure staff have a strong understanding of each grant's eligibility requirements, terms, funding limits, documentation requirements, etc. so staff can effectively screen customers for all available grants. By braiding funds the LWDA is leveraging all available resources to best support customers' abilities to attain industry recognized credentials leading to higher wage jobs. Also, when training is partially funded through WIOA, the Region can include any measurable skills gains and credentials in its performance metrics.

**Regional Website** – The Region's website provides potential clients with details on how WorkOne and its partners can provide supports for people seeking career planning, training and job search options, before entering a WorkOne location. The website includes links to required and non-required partner organizations. The Region uses its website to make its local WIOA performance statistics available to the public as required per [20 CFR 678.430](#) and provides metrics that illustrate in a concrete way how workforce services have impacted the local area. Examples include the total number of residents who have engaged in workforce services, received various types of training, earned credentials, and the approximate impact on the local economy's wages. The website illustrates what WorkOne and its partners do and how their efforts improve the lives of area Hoosiers. Finally, the Region posts all its policies on its website, therefore making them easily available to staff, board members, monitors, and any other interested parties.

**Regional Media Presence** – The Region's use of social media to reach diverse populations was noted in its PY2022 monitoring report. The following year that initiative expanded to include additional social and broadcast media platforms, and to build awareness of resources available from WorkOne and its network of local organizations. Featured content includes Facebook, PBS Broadcasting, and the Regional website. Overall, the Region's use of social media demonstrates its commitment to improving the local community and the lives of its residents.

**Comprehensive Staff Onboarding and Training** – One Region has 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, which includes a blend of training methods, including reading materials, instruction by leadership and MIS 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.

**Stakeholder Recognition Awards** – One Region has taken a unique approach to bringing awareness to the accomplishments of the workforce development ecosystem in its area with the Stakeholder Recognition Awards. 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 LWDA's Annual Report which includes 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. Awards are presented for Client of the Year, Community Partner of the Year, and Business of the Year. 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.



## WIOA Equal Opportunity

**Outreach and Data Analysis** – One Region provided results from a standard deviation analysis that compared census level population data to WIOA participants. The analysis was broken down by each county, which WIOA program (Adult, Dislocated Worker, and Youth), and by service received (training or career). This allowed a very specific look at protected groups enrolled in services and whether expected enrollment was greater or less than their counterpart groups, which in turn then allowed a specific analysis as to potential reasons why. The LWDA provided a report that included their methods of analysis, results, and a summary, which includes recommendations for outreach and service provider staff training/process review. The results are shared with leadership and discussed to determine possible training topics and reasons for the results. Sharing this data promotes discussion on how to increase services to the underserved populations and possible outreach opportunities.

**Outreach and Inclusiveness** – One Region developed an employer networking group that provides resources and best practices on how an organization can be an inclusive employer. The creation of this group provides a unique opportunity for community businesses to hire and retain individuals historically overlooked for employment opportunities. The goal is to connect these businesses with matching, qualified employee candidates from three populations that may have challenges in securing employment including: individuals with disabilities, individuals previously involved in the justice system, and individuals new to the United States.

The LWDA is providing workshops to educate employers about topics including work-based learning and apprenticeships, the benefits of joining the employer networking group, and EEO laws and possible incentives for recruiting and retaining certain groups of employees. Creating this resource for employers has potential to not only help employers hire and retain qualified employees, but to also provide opportunities for individuals in protected classes gain full-time, well-paid employment.

**Combined Language and Disability Accessibility Plan** – One Region's Language Access Plan went a step farther by including plans for how individuals with disabilities can access WIOA services. The plan identifies how the Region works to support individuals with disabilities which includes having computers with Ease of Access Tools, providing written materials in Braille and large print, and ensuring its physical 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 or to schedule sign language interpreters for people who may have difficulty hearing. In addition, reasonable accommodations to support individuals with disabilities are described with instructions and timelines to ensure that staff's requests for accommodations are made timely. The plan describes the Region's training on EO and ADA requirements and how its subrecipients will be routinely monitored. Providing staff with this important resource information helps ensure that they understand how to effectively support people with disabilities. The language access provisions also help ensure that service provider staff are aware of what to do when an individual with limited English proficiency needs assistance. The provision of language access and language services are paramount in ensuring the public has equal access to the meaningful services provided by the Region's WorkOne offices.

**WorkOne Accessibility Workstation Flyer** – One Region developed a WorkOne Accessibility Workstation Flyer that is located directly on the accessibility workstation of its WorkOne offices and explains the services available to individuals with disabilities, which makes it easier for the staff to provide services. The flyer includes pictures of the desktop shortcuts, accessibility assistance helplines, Video Relay Service information, website resources and phone numbers and indicates that the full binder is also available for more detailed information.

**Language Accessibility** – The LWDA identified the four most prominent languages in its communities (English, Spanish, Marshallese, and Haitian Creole) and had EO is the Law posters posted in the

welcome area for those languages. One of the Region's comprehensive WorkOne offices provides very large, visible signage in the welcome area that are in English and Spanish and are on a TV teleprompter and all job orders.

## WIOA Fiscal and Administrative

**Comprehensive Accounting Manual** – The LWDAs Accounting Manual consolidates all of the Region's financial related policies and procedures into one, easy to navigate document. A General Policies section contains background information that could be helpful for all staff getting acclimated to the Region. The manual then goes into greater detail with policies associated with revenues and cash receipts, expenditures and disbursements, asset accounts, liability and net asset accounts, financial and tax reporting. The Region has created an excellent reference tool and training resource for new staff, board members, and others interested in the Region's financial internal controls and operations.

**Comprehensive Subrecipient Fiscal Monitoring Checklist** – One Region's subrecipient monitoring tool ("Fiscal Compliance Checklist") is well organized, comprehensive, and easy to understand. The checklist navigates the user 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. The Checklist validates that Uniform Guidance required written policies ([2 CFR 200](#)) and recommended minimum written procedures for effective internal controls are in place. Of particular interest is the section assessing the subrecipient's single audit prompts for monitors to ask about how results are followed up on. The Region has created an excellent fiscal monitoring tool and training resource for new staff, board members, and others interested in the Region's fiscal monitoring methodology.

**Community Communication** – Through photographs, illustrated statistics of the LWDA's impact, and narrative descriptions of events that the LWDA either sponsored or participated in the Year in Review document provides a good overview of all that the LWDA is involved with and has accomplished. The publication covers both how the LWDA 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 LWDA's funding and showcases the different levels of financial commitment that investors have made to support the vision of a workforce that empowers regional businesses to be competitive in a global economy. Also, a newsletter developed by the One-Stop Operator 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. This is a monthly newsletter and partners are invited to submit content.

**The Kid Zone** – One of the Region's comprehensive WorkOne offices has a Kid Zone play area which creates a welcoming and supportive environment for young children and 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.

## Migrant and Seasonal Farm Worker Program

**Partnerships** – The State Monitor Advocate met with the Regional Business Services Team and was informed about a collaboration between the LWDA and one of its training partners, the potential development of a Farming apprenticeship that will utilize the training provider's farms to help individuals learn about the farming industry and farming jobs and to gain valuable farming experience. This collaboration will provide an excellent opportunity for MSFWs to secure steady, stable employment and transition to establishing permanent Indiana residency.

## Apprenticeship Building America Grant

Despite challenges, there are notable examples of innovative and promising practices. For instance, a partnership with the Family Social Services Administration to create Registered Apprenticeship Programs (RAPs) for Substance Abuse Counselors highlights the potential for impactful and scalable initiatives. Similarly, development of a Certified Pre-Apprenticeship Program with articulated pathways into RAPs demonstrates a strong foundation for success. For further information, please contact OWBLA to connect with the Regions of interest. OWBLA's technical assistance and programs, such as the Apprenticeship Indiana Institute, have been instrumental in supporting employer engagement and improving the quality of apprenticeship services.

### Reemployment Services and Eligibility Assessment

**Hiring a Bilingual RESEA Coach** – To support the number of Spanish-speaking participants, one LWDA hired a bilingual RESEA coach to assist providing RESEA services to the Spanish speaking people who have been selected to participate in RESEA. The coach will also assist in making RESEA reminder calls to these people and translating for other Spanish speaking individuals who enter the WorkOne office.

**RESEA Work Area** – One Region has a RESEA work area that is well designed to allow coaches to consult as needed while serving participants. RESEA-specific blank forms and flyers are organized on a small desk between coaches for easy access. RESEA staff created a flyer for Virtual Workshops with the three regular workshops' information (day, time, meeting ID). Each virtual meeting listed included a phone number so that if a claimant was unable to log into the virtual meeting, they could attend by audio only. The staff phone number was available for ease of reschedule.

**Using Alternate Phone Numbers for Reminder Calls** – Case notes documented RESEA service provider coaches' additional efforts to reach clients to remind them about their upcoming scheduled RESEA events. When clients' primary phone numbers had been disconnected or their voice mail boxes were full, RESEA service provider staff used clients' alternative phone numbers, and the ICC feature to send automated email messages to clients notifying them of upcoming RESEA appointments.

**Use of Smartsheet** – One Region utilizes Smartsheet to effectively manage RESEA customer traffic. This data management system has made the task of coordinating RESEA activities organized and efficient. Smartsheet tracking begins when RESEA claimants check in at the front desk and changes color as the claimant progresses through their RESEA appointment.

**RESEA Delivery Flow** – One Region revised its entire RESEA delivery flow to shorten participant wait times. The changes appear to have greatly reduced wait times for participants to have one-on-ones with RESEA Coaches. Results include:

All RESEA participant event activities occur together in a defined area near the two RESEA staff cubicles and the computer lab used for independent viewing of the orientation video.

A RESEA check in desk is located outside the computer lab to direct traffic and ensure no one gets lost in the process.

The WIOA Team assists with checking individuals in, setting them up to watch the video with headphones in the lab, verifying that pre-assignments are completed before one-on-one meetings, and assisting with ICC registration/WP application process.

Color coded file folders are used at the RESEA check in table for paperwork. Veteran folders are red to easily identify priority of service. Veterans are moved to the front of the line for one-on-one meetings upon completing viewing the orientation video.

Participants in the waiting area are easily seen by staff, so no one waits unnecessarily.

## DWD POLICY/TECHNICAL ASSISTANCE

Throughout PY23 and the first half of PY24, DWD's Policy Team issued 70 guidance documents, with about half of the issuances consisting of changes to existing policies or technical assistance. Several PY23 issuances (DWD Policy 2023-05, DWD TA 2023-10, and others) are related to trends identified by DWD's Monitoring Team during their reviews. Most of the guidance issued requires Local Areas and WorkOne/AJCs to develop corresponding policies and procedures addressing local needs.

**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.**

Relevant statewide guidance is included in the tables below.

PY23/PY24 WIOA Governance Guidance
<a href="#">DWD Policy 2024-04: Cost Allocation Plans</a>
<a href="#">DWD Policy 2023-04: VOSGreeter® Guidance</a>
<a href="#">DWD Policy 2017-09, Change 1: Guidance Related to WIOA Individual Training Account Funding</a>
<a href="#">DWD TA 2020-17, Change 2: Workforce Innovation and Opportunity Act (WIOA) INTraining and Eligible Training Provider List (ETPL) Procedural Guidance</a>
<a href="#">DWD Policy 2020-16, Change 2: INTraining and Eligible Training Provider List (ETPL) Eligibility and Establishment Under the Workforce Innovation and Opportunity Act (WIOA) Title I</a>
<a href="#">DWD Policy 2018-04, Change 2: Memoranda of Understanding and Infrastructure/Additional Costs Funding Guidance</a>
<a href="#">DWD Policy 2023-19: Workforce Innovation and Opportunity Act (WIOA) Customer Satisfaction Survey</a>
<a href="#">DWD Policy 2023-18: WIOA Negotiations and Sanctions</a>
<a href="#">DWD Memo 2023-17: PY 2024 Workforce Innovation and Opportunity Act Formula Allocations</a>
<a href="#">DWD Memo 2023-16: PY 2024 WIOA Local and Regional Plan Instructions</a>
<a href="#">DWD Memo 2023-15: 2024 Economically Disadvantaged Criteria</a>
<a href="#">DWD Policy 2021-08, Change 1: Co-Enrollment and Common Exit</a>
<a href="#">DWD Policy 2023-14: Identification of Regions and Designation of Local Areas under WIOA</a>
<a href="#">DWD Policy 2020-09, Change 1: One-Stop American Job Center Certification</a>
<a href="#">DWD Policy 2023-03: Social Media Management</a>

### PY23/PY24 WIOA Title I Adult/DW and Business Services Guidance

[\*\*DWD Policy 2024-05:\*\* WIOA Title I Business Services](#)

[\*\*DWD Policy 2019-04, Change 3:\*\* Workforce Innovation and Opportunity Act \(WIOA\) Title I Adult Priority of Service](#)

[\*\*DWD Policy 2022-18, Change 1:\*\* National Dislocated Worker Grants](#)

[\*\*DWD Policy 2020-10, Change 1:\*\* Workforce Innovation and Opportunity Act \(WIOA\) Title I Service Delivery](#)

[\*\*DWD TA 2023-10:\*\* Follow-Up Services for WIOA Title I Adult and Dislocated Worker Program Participants](#)

[\*\*DWD TA 2022-12, Change 1:\*\* Quality Jobs, Equity, Strategy, and Training \(QUEST\) Disaster Recovery National Dislocated Worker Grant \(DWG\)](#)

### PY23/PY24 Adult Education Guidance

[\*\*DWD Policy 2016-02, Change 1:\*\* Requirements for High School Equivalency Testing Center Monitoring and Incident Reporting](#)

[\*\*DWD Policy 2016-02, Change 1 Att. A:\*\* HSE Site Monitoring Template](#)

[\*\*DWD Policy 2019-01, Change 6:\*\* High School Equivalency Testing](#)

### PY23/PY24 WIOA Youth/JAG Guidance

[\*\*DWD Memo 2024-02:\*\* Jobs for America's Graduates \(JAG\) Enrollment](#)

[\*\*DWD Policy 2017-03, Change 2:\*\* Youth Eligibility](#)

[\*\*DWD Policy 2017-10, Change 1:\*\* Guidance on WIOA Title I Youth Work Experience](#)

[\*\*DWD TA 2023-01:\*\* Indiana Career Connect Youth Work Experience Data Entry](#)

[\*\*DWD Policy 2018-01, Change 2:\*\* Guidance on WIOA Title I Youth Program Elements](#)

### PY23/PY24 Wagner-Peyser Employment Services Guidance

[\*\*DWD Policy 2023-20:\*\* Discontinuation of Wagner-Peyser Employment Services to Employers](#)

[\*\*DWD TA 2022-21, Change 1:\*\* Step-by-Step Process for Intrastate Clearance Orders](#)

[\*\*DWD TA 2023-13:\*\* Employment Service Self-Appraisal System](#)

[\*\*DWD Memo 2023-12:\*\* Interim Guidance on the Required Employment Service and Employment-Related Law Complaint System Posters](#)

[\*\*DWD Policy 2023-09:\*\* Foreign Labor Certification Programs Overview and Recruitment Processes](#)

[\*\*DWD Policy 2022-19, Change 1:\*\* Migrant and Seasonal Farmworkers Requirements and Service Provisions under the Monitor Advocate System, Wagner-Peyser Act, and Title III of the Workforce Innovation and Opportunity Act](#)

**PY23/PY24 Equal Opportunity and Accessibility Guidance**[DWD Policy 2023-07: Language Accessibility and Language Access Plans](#)[DWD TA 2023-06: Document Accessibility Tips](#)**PY23/PY24 Data Integrity, Privacy, and Performance Guidance**[DWD Policy 2024-03: Measurable Skill Gains Primary Indicator of Performance for WIOA Title I Programs](#)[DWD Policy 2022-08, Change 1: Workforce Programs Data Validation](#)[DWD Policy 2023-05: Maintaining Data Integrity in Workforce Programs](#)[DWD Policy 2021-10, Change 2: Safeguarding Protected Information and DWD User Accounts Management](#)[DWD TA 2022-13, Change 1: DWD Microsoft TEAMS User Guidance on Safeguarding Protected Information](#)[DWD Memo 2020-15, Change 1: Confidentiality Statement Required for All Non-DWD Individuals Accessing DWD Records](#)[DWD Policy 2017-08, Change 2: Suitability Standards for Department of Workforce Development Employees, Contractors, and Subcontractors with Access to Federal Taxpayer Information](#)[DWD TA 2024-01: Local Statistical Adjustment Model Tool](#)

## Thank You!

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

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, Workforce Program Administration Director, [CHhudgens@dwd.in.gov](mailto:CHhudgens@dwd.in.gov)

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

Kaitlyn Steinhiser, Director of Policy, [KSteinhiser@dwd.in.gov](mailto:KSteinhiser@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)

Schuyler Esau, Program Monitor, [SEsau@dwd.in.gov](mailto:SEsau@dwd.in.gov)

**Equal Opportunity:**

Jennifer Long, State EO Officer, [JLong@dwd.in.gov](mailto:JLong@dwd.in.gov)

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

**Governance:**

Zoe Francis, Workforce Programs Governance Analyst, [ZFrancis@dwd.in.gov](mailto:ZFrancis@dwd.in.gov)

Trion Thomas, Senior Compliance Monitor-Governance, [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)

Jeff Halcomb, Program Director Employer Engagement, [JHalcomb@dwd.in.gov](mailto:JHalcomb@dwd.in.gov)

**NextLevel Jobs – Workforce Ready Grant (WRG):**

Kathryn Moscrip, Program Director, [KMoscrip1@dwd.in.gov](mailto:KMoscrip1@dwd.in.gov)

Kara Frye, Grant Coordinator 2, [KFrye@dwd.in.gov](mailto:KFrye@dwd.in.gov)

**Office of Work Based Learning and Apprenticeship (OWBLA):**

Jason Graves, Senior Director Office of Work based Learning and Apprenticeship,  
[JGraves@dwd.in.gov](mailto:JGraves@dwd.in.gov)

Chris Schmitt, Apprenticeship Grants Manager [CSchmitt@dwd.in.gov](mailto:CSchmitt@dwd.in.gov)

**Reemployment Services and Eligibility Assessment (RESEA):**

Catherine Lawell, Director of Re-Employment Pathways, [CLawell@dwd.in.gov](mailto:CLawell@dwd.in.gov)