



State of Indiana Nondiscrimination Plan

Implementing Section 188 of the Workforce Innovation and Opportunity Act

2022 - 2024

Equal Opportunity Employer/ Program
Auxiliary aids and services available upon request to individuals with disabilities.

Contents

Element 1: Designation of State and Local Equal Opportunity (EO) Officers	1
Element 1 Documentation	8
Element 2: Notice and Communication	56
Element 2 Documentation	60
Element 3: Review Assurances, Job Training Plans, Contracts, and Policies and Procedures	99
Element 3 Documentation	101
Element 4: Affirmative Outreach	117
Element 4 Documentation	126
Element 5: Compliance with Disability Nondiscrimination Requirements	188
Element 5 Documentation	192
Element 6: Data and Information Collection and Maintenance	220
Element 6 Documentation	222
Element 7: Monitor Recipients for Compliance	243
Element 7 Documentation	246
Element 8: Complaint Processing Procedures	295
Element 8 Documentation	298
Element 9: Corrective Actions/ Sanctions	313
Element 9 Documentation	314

Element 1: Designation of State and Local Equal Opportunity (EO) Officers

[29 CFR 38.28 through 38.33]

The Governor of Indiana has delegated authority to the Commissioner of the Department of Workforce Development (DWD) to administer and oversee the nondiscrimination and equal opportunity (EO) provisions of Section 188 of the Workforce Innovation and Opportunity Act (WIOA) and its implementing regulations at 29 CFR Part 38 (collectively, Section 188).¹ The DWD Commissioner, on behalf of the Governor, is ultimately responsible for Indiana's Section 188 compliance, including development and implementation of this Nondiscrimination Plan (NDP). DWD employs a designated State EO Officer to ensure that Indiana's Local Workforce Development Areas (LWDAs), sub-recipients, and workforce system partners are aware of, and in compliance with, the NDP and all Section 188 responsibilities. Similarly, each LWDA has designated a Local EO Officer to carry out these duties at the local level.

State EO Officer Designation

In compliance with Section 188, Jennifer Long has been designated as the State EO Officer.² In this role, she oversees the coordination, implementation, maintenance, and monitoring of the nondiscrimination and EO requirements of Section 188. Ms. Long reports directly to DWD's Compliance and Policy Workforce Division Associate Chief Connie Wray, who reports to Chief Workforce Officer Michael Barnes. Ms. Long has access to the DWD Commissioner, the Governor's designee, for EO and nondiscrimination matters as needed.³

Ms. Jennifer Long, State EO Officer
Indiana Department of Workforce Development
10 N. Senate Avenue, IGCS SE 312
Indianapolis, IN 46204
317-233-4380
TDD/TTY: 800-743-3333

State EO Officer Designation and Program Liaisons

Unemployment Insurance Quality Control Division:

EO Liaison for Unemployment Insurance Program, assists the State-Level EO Officer in providing reasonable accommodations to customers and gathering and providing information for unemployment customer discrimination complaints.

Adult Education Division:

¹ Documentation 1.1: Governor's Designation Letter

² Documentation 1.1: Governor's Designation Letter

³ Documentation 1.2: State Level Organizational Chart

EO liaison for Adult Education, assists the State-Level EO Officer in providing reasonable accommodations to customers and gathering and providing information for Adult Education customer discrimination complaints.

Workforce Services Field Operations Division:

Wagner-Peyser, Trade Adjustment Assistance (TAA), Reemployment Services and Eligibility Assessment (RESEA), Migrant Seasonal Farmworker (MSFW), and Veterans services. Discrimination complaints are forwarded to the State-Level EO Officer and collaborates, when needed, on investigations.

Workforce Education Division:

INTraining is comprised of two lists: INTraining list and the Eligible Training Provider (ETP) list. These two lists are Indiana's resource to locate quality occupational training. EO liaison for Workforce Education's INTraining and ETP lists, assists in ensuring that all training providers meet the criteria per WIOA which includes section 188 in providing reasonable accommodations to customers and gathering and providing information on discrimination complaints to the State-level EO Officer.

Local EO Officer Designation

Indiana's twelve LWDA's have each designated a senior-level employee as the Local EO Officer.^{4&5} Contact information for each Local EO Officer is listed below.

Indiana Local EO Officer Directory

LWDA 1

Nora Wiergacz, Human Resource Consultant/EO
Center of Workforce Innovations, Inc.
2804 Boilermaker Ct., Suite E, Valparaiso, IN 46383
Phone: 219-462-2940
Email: nwiergacz@cwicorp.com

Erica Lillie, Director of Quality Initiatives and EO
Officer

Northeast Indiana Works
200 E. Main Street, Ste. 910, Ft. Wayne, IN 46802
Phone: 260-469-4319
Email: elillie@neworks.org

LWDA 2

Melissa Gard, Disability Resource Specialist and EO
Officer
Northern Indiana Workforce Board, Inc.
430 Waterfall Drive, Elkhart, IN 46516
Phone: 574-295-0105, Ext 3025
Email: mgard@gotoworkone.com

LWDA 4

Mellisa Leaming, Director of Operations/EO Officer
Region 4 Workforce Board
976 Mezzanine Drive, Suite C, Lafayette, IN 47905
Phone: 765-807-0888
Email: mleaming@tap.lafayette.in.us

LWDA 3

LWDA 5

⁴ Documentation 1.3: Sample Local Level Organizational Chart

⁵ For a map of Indiana's LWDA's, see Documentation 1.4: Indiana LWDA's

Cindy Gosser, **PHR/SHRM-CP, Human Resources Manager/EO Officer**
WorkOne Central
836 S. State Street, PO Box 69, Greenfield, IN 46140
Phone: **317-467-0248**, Ext. 303
Email: cgosser@workonecentral.org

LWDA 6

Jessica Masters, Manager of Administration and Equal Opportunity Officer
Eastern Indiana Works/ASG
3310 W. Fox Ridge Lane, Ste. A, Muncie, IN 47304
Phone: **765-807-2355**
Email: jmasters@easternindianaworks.org

LWDA 7

Nikkie Spurr, Chief Operations Officer /EO Officer
Western Indiana Workforce Development Board, Inc.
630 Wabash Ave., Ste. 205, Terre Haute, IN 47807
Phone: **812-238-5616 x 3**
Email: Nspurr@workforcenet.org

LWDA 8

Rob King, WDB Director/Executive Director of Workforce Services and EO Officer
South Central Region 8 Workforce Board / Vincennes University
333 S Landmark Avenue, Bloomington, IN 47403
Phone: **812-322-6835**
Email: reking@vinu.edu

LWDA 9

Amanda Getzendanner, Project and Administrative Manager/EO Officer
Southeast Indiana Workforce Board
500 Industrial Drive, Lawrenceburg, IN 47025
Phone: **513-602-4495**
Email: amandag@workonesoutheast.org

LWDA 10

ShiLese Stover, Operations Director/EO Officer
Region 10 Workforce Board, Inc.
2125 State St., Suite 16, New Albany, IN 47150
Phone: **812-941-6422**
Email: shilese@soinworks.com

LWDA 11

Linda Jones, Administrative Coordinator/EO Officer
Southwest Indiana Workforce Board
4600 Washington Avenue, Suite 113, Evansville, IN 47714
Phone: **812-428-4455**
Email: Linda.Jones@swinworkforce.org

LWDA 12

Kevin Duffy, Senior Director, Ecosystem Advancement/EO Officer
EmployIndy/WorkOne
115 W Washington St, Ste 450 S, Indianapolis, IN 46204
Phone: **317-289-9781**
Email: kduffy@employindy.org

Public Notice of State and Local EO Officers

DWD makes the identity of the State EO Officer known to applicants, registrants, eligible applicants/registrants, participants, employers, employees, applicants for employment and the public by the following methods:

- Formal notice to Indiana's workforce development system is disseminated through DWD Policy.⁶
- Name and full contact information published on DWD's EO webpage at <https://www.in.gov/dwd/eo.htm>.

The Local EO Officers make their identities known to applicants, registrants, eligible applicants/registrants, participants, employers, employees, applicants for employment and the

⁶ Documentation 1.5: DWD Policy 2016-09: EO and Nondiscrimination Guidance Letter

public by posting notices of “Equal Opportunity is the Law” in the American Job Center offices, which Indiana refers to as WorkOne offices. The notices are posted in languages other than English that reflect the language spoken by significant portions of the population within the relevant service area. DWD provides printable/fillable notice templates on its EO webpage at https://www.in.gov/dwd/files/EO_Law.pdf. Additionally, each LWDA has developed local policy in conformance with Section 188 and State guidance. The local policies provide contact information for the respective Local EO Officer.

Duties of State and Local EO Officers

DWD’s State EO Officer is a full-time position.⁷ As such, none of the State EO Officer’s duties create a conflict of interest, or the appearance of a conflict, with the responsibilities of an EO Officer.⁸

The State EO Officers’ responsibilities include, but are not limited to:

- Overseeing the development and implementation of the NDP;
- Serving as the state’s liaison with CRC;
- Monitoring compliance of Section 188 requirements on an annual basis;
- Undergoing training and providing training and technical assistance to Local EO Officers; and
- Developing procedure for and investigating discrimination matters that rise to the state level.

Most Local EO Officers operate in this role on a part-time basis.⁹ Although the Local EO Officer may have other job duties, those duties do not create a conflict of interest, or the appearance of a conflict, with the EO Officer responsibilities. While formally reporting to their respective LWDA directors, the Local EO Officers also functionally report to the State EO officer on matters pertaining to Section 188.

The Local EO Officer’s responsibilities include, but are not limited to:

- Reporting EO/Nondiscrimination matters to the State EO Officer;
- Processing and investigating local discrimination complaints;
- Monitoring compliance of regional WIOA Title I recipients;
- Undergoing training and providing training for staff and service providers (participation required for quarterly conference calls and training sessions conducted by DWD’s State EO Officer);
- Surveying WorkOne offices to ensure compliance with applicable accessibility requirements;
- Reviewing the Region’s policies to ensure they are nondiscriminatory;

⁷ Documentation 1.6: State EO Officer Job Description

⁸ Documentation 1.7: Excerpt from EO NDP Training Element 1 PowerPoint

⁹ Documentation 1.8: Sample Local EO Officer Job Description

- Conducting outreach and education about EO and nondiscrimination requirements and how an individual may file a complaint; and
- Ensuring overall implementation of the NDP.

Support and Training

The State EO Officer has both operational and administrative support through additional Compliance and Policy Workforce Division staff, several of which have been cross trained regarding Section 188 compliance. Ms. Long also has one direct report, the Compliance Specialist, who focuses primarily on EO functions.¹⁰ The entire Compliance and Policy Workforce Division works closely together to coordinate and conduct annual compliance monitoring of each LWDA. Further, the State EO Officer and Compliance Specialist design and implement various training and technical assistance methods to support the Local EO Officers. The State EO Officer and Compliance Specialist salaries are funded by WIOA Administration funds.

The State EO Officer developed a series of Section 188 trainings that followed the nine elements of the NDP via PowerPoint presentation.¹¹ In 2019, the PowerPoint presentations were made mandatory for Local EO Officers and contained a Survey Monkey quiz at the end to ensure completion and comprehension¹². Questions frequently missed **were** discussed with Local EO Officers by the State EO Officer and provided insight to additional training needed. The following topics were covered:

- Element 1: State and Local Equal Opportunity Officers
- Element 2: Notice and Communication
- Element 3: Assurance Language
- Element 4: Affirmative Outreach
- Element 5: Compliance with Disability Nondiscrimination Requirements
- Element 6: Data and Information Collection and Maintenance
- Element 7: Monitoring Recipients for Compliance
- Element 8: Complaint Processing Procedures
- Element 9: Corrective Actions and Sanctions

These nine PowerPoint presentations are posted on DWD's EO webpage as a resource for both the Local EO Officers and the public. Additionally, in July 2019 the State EO Officer developed a PowerPoint presentation titled "Equal Opportunity 101", which is meant to be used by Local EO Officers to introduce and train LWDA staff to equal opportunity and certain aspects of the NDP they would encounter working in the WorkOne offices.¹³ To provide continual training, the

¹⁰ Documentation 1.9: Compliance Specialist Job Description

¹¹ Documentation 1.10: EO NDP Training PowerPoints

¹² Documentation 1.11: NDP Regional Training Completions

¹³ Documentation 1.12: Equal Opportunity 101 Presentation

State **has implemented** further training around specialized topics, **including EO data analysis and local monitoring requirements.**¹⁴ **Local EO Officers are continuously sent training opportunities and resources from the State EO Officer.**¹⁵

When a new individual is designated as a Local EO Officer, the State EO Officer provides them with the necessary training and resources to carry out their responsibilities. The State EO Officer created a welcome packet for new Local EO Officers. This packet includes a checklist of reading materials and things to do to get started and a guide with listed resources.¹⁶

The State EO Officer hosts quarterly conference calls where the Local EO Officers are required to participate to discuss current activity within the twelve LWDAs. Items discussed include, but are not limited to, structural and programmatic accessibility of buildings, programs, and services to ensure equal access, integration, outreach efforts, training needs of staff, monitoring, and the development and implementation of necessary policies and procedures. These conference calls are used as a vehicle to distribute information, gain insight into training needs for Local EO Officers, and respond to questions from the field.¹⁷

The state EO Officer participates in statewide leadership operations meetings on a quarterly bases to educate the local area leadership on EO responsibilities and requirements.

The State EO Officer is a member of the National Association of State Workforce Agencies (NASWA) EO Committee and regularly attends the quarterly EO Committee meetings. For example, in December 2021 Indiana's State EO Officer attended the EO Committee meeting in Austin, TX ¹⁸ The meeting provided sessions on best practices, CRC updates, and discussions of EO challenges and opportunities in various states throughout the country. In addition, the State EO Officer was nominated to be the Chair for the William J. Harris Award Committee.¹⁹ **The committee selects nominations from all of the states who have created significant contributions towards the achievement of equal opportunity and nondiscrimination initiatives. The State EO Officer is also on the Communications and Discrimination Complaints NASWA workgroups.**

Indiana's Governor appointed a Chief Equity, Inclusion and Opportunity Officer who is a member of the Governor's Cabinet, reporting directly to the Governor. This individual will improve equity, inclusion, and opportunity across all state government operations and move for systemic change to remove barriers in the government workplace and the services they provide. They will also work with the state agencies to develop strategic plans to remove barriers. **Additionally, In August of 2020, Indiana's Governor Eric J. Holcomb shared his thoughts on how true equality and equity lead to opportunities for all. During his address he committed that the state of Indiana would lead by example and take concrete steps to shape the change**

¹⁴ Documentation 1.13: Equal Opportunity Data Analysis Presentation

¹⁵ Documentation 1.14: Equal Opportunity Trainings

¹⁶ Documentation 1.15: Welcome Packet Checklist and Guide

¹⁷ Documentation 1.16: EO Quarterly Conference Calls

¹⁸ Documentation 1.17: NASWA Meeting Agenda

¹⁹ Documentation 1.18: The William J. Harris Committee Information

necessary to remove barriers to access and opportunity for all Hoosiers. One of those priorities was to create a public disparity data dashboard, providing Hoosiers the occasion to track the state's progress with closing equity gaps. Since that address, Indiana's Management Performance Hub, in partnership with agencies across state government, created the state's Equity Data Portal.²⁰ This dashboard encompasses a high-level view of equity related to health, public safety, social services, education, and workforce. The data sets come from a variety of sources each with their own nuances.

In 2020, the Indiana State Personnel Department's Diversity and Inclusion Program Manager is providing a mandatory Diversity and Inclusion training for all employees of the State of Indiana. Topics of the training were defining diversity and inclusion, unconscious bias and how it inadvertently produces bias actions, making the workplace inclusive versus diverse, culture and the cultural lense and how it can create a toxic work culture, working through four action steps to combat unconscious bias to reprogram thinking, and bringing the unconscious to the conscious so that everyone can work on their thoughts that cause them to work against other people.

The State EO Officer and other members of DWD's Compliance and Policy Workforce Division frequently participate in various topic-specific webinars, conference calls, partner training opportunities, and networking events to ensure continual training and competency concerning Section 188 compliance.²¹

²⁰ Documentation 1.19: Indiana Equity Data Portal

²¹ For further details, see Element 5

Element 1 Documentation

Documentation 1.1: Governor's Designation Letter

Documentation 1.2: State Level Organizational Chart

Documentation 1.3: Sample Local Level Organizational Chart

Documentation 1.4: Indiana LWDAs

Documentation 1.5: DWD Policy 2016-09: EO and Nondiscrimination Guidance Letter

Documentation 1.6: State EO Officer Job Description

Documentation 1.7: Excerpt from EO NDP Training Element 1 PowerPoint

Documentation 1.8: Sample Local EO Officer Job Description

Documentation 1.9: Compliance Specialist Job Description

Documentation 1.10: EO NDP Training PowerPoints

Documentation 1.11: NDP Regional Training Completions

Documentation 1.12: Equal Opportunity 101 Presentation

Documentation 1.13: Equal Opportunity Data Analysis Presentation

Documentation 1.14: Equal Opportunity Trainings

Documentation 1.15: Welcome Packet Checklist and Guide

Documentation 1.16: EO Quarterly Conference Calls

Documentation 1.17: NASWA Meeting Agenda

Documentation 1.18: The William J. Harris Committee Information

Documentation 1.19: Indiana Equity Data Portal



STATE OF INDIANA
OFFICE OF THE GOVERNOR
State House, Second Floor
Indianapolis, Indiana 46204

Eric J. Holcomb
Governor

March 13, 2018

Ms. Naomi Barry-Perez, Director
Civil Rights Center
200 Constitution Ave. NW, Room N-4123
Washington, DC 20210

RE: Section 188 Designee Letter

Ms. Barry-Perez:

The Indiana Department of Workforce Development (DWD) is the designated state agency recipient of Workforce Innovation and Opportunity Act (WIOA) funding and is therefore responsible for compliance with the equal opportunity (EO) and nondiscrimination provisions of WIOA Section 188 and its implementing regulations at 29 CFR Part 38.

Pursuant to the regulations, the Governor may delegate WIOA Section 188 EO and nondiscrimination responsibilities to a designee. Mr. Frederick D. Payne, DWD Commissioner, is my designee for all such activity (including development and implementation of the State Nondiscrimination Plan, oversight and monitoring of EO and nondiscrimination compliance, and any other related duties of the Governor).

Indiana's designated State-level Equal Opportunity Officer is Ms. Jennifer Long of DWD's Regulatory Oversight and Compliance Division. Ms. Long serves as the liaison for the Civil Rights Center and has access to my designee, Commissioner Payne, as needed.

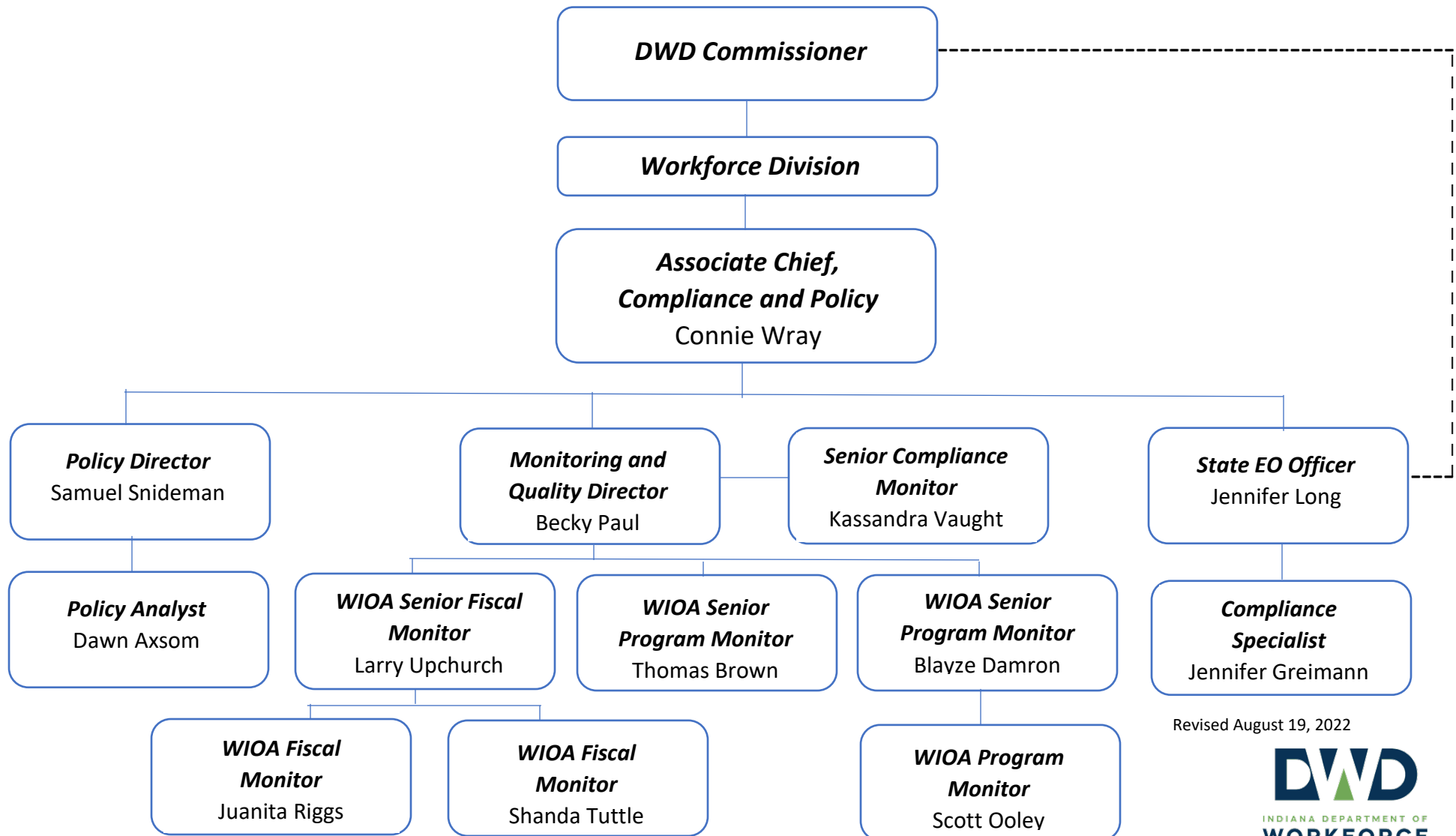
Should you have any questions or concerns regarding Indiana's EO and nondiscrimination policies, processes, or procedures under WIOA, please contact Ms. Long as indicated below:

Jennifer Long, State Equal Opportunity Officer
Indiana Department of Workforce Development
10 N. Senate Ave., IGCS SE 306, Indianapolis, IN 46204
JLong@dwd.in.gov
(317) 430-2247

Respectfully,

Eric J. Holcomb

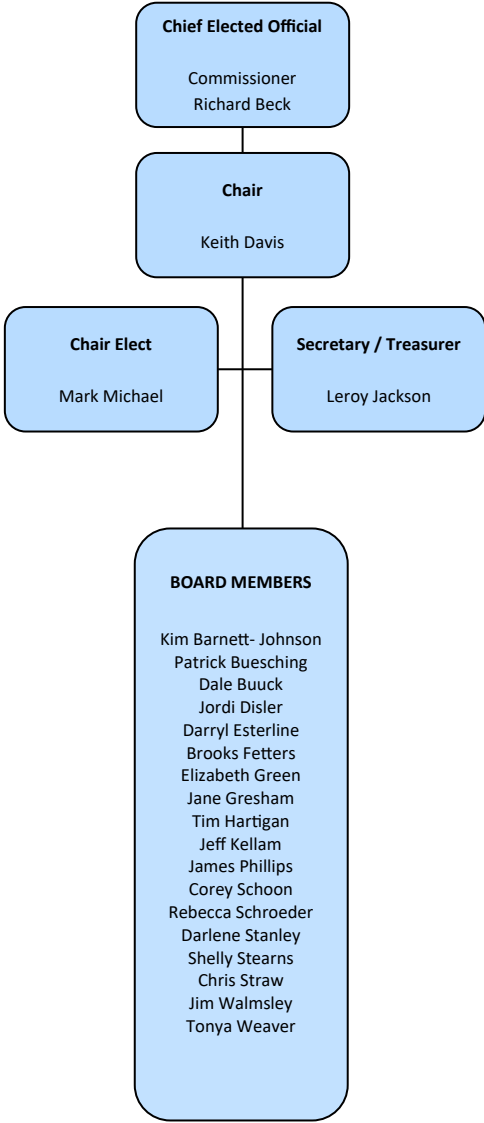
State Level Organizational Chart



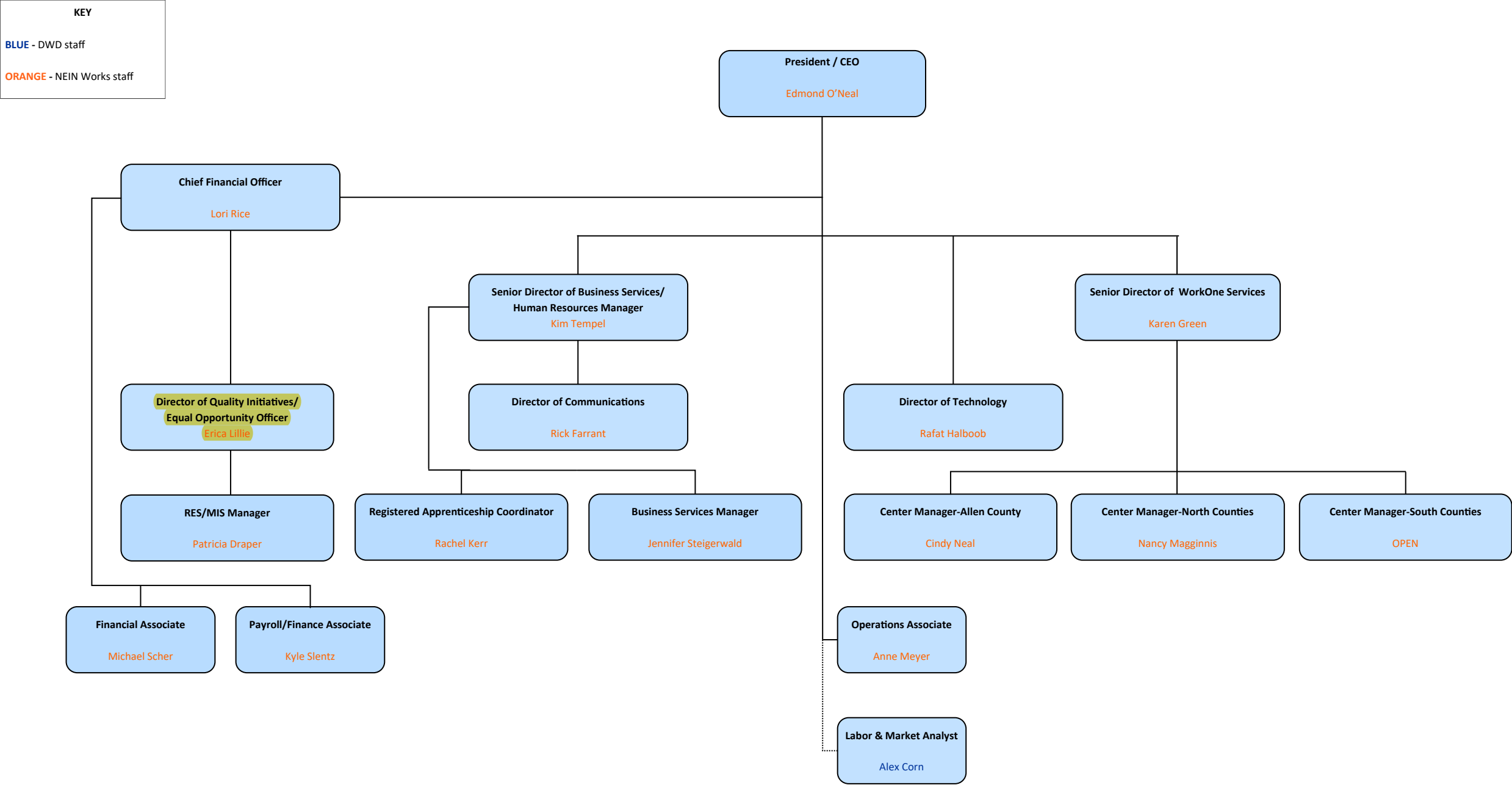
Revised August 19, 2022



Northeast Indiana Works Board of Directors



Northeast Indiana Works Administrative Staff Organizational Chart



Northeast Indiana Works Staff Organizational Chart

KEY

BLUE - DWD staff

ORANGE - NEIN Works staff

Green - Pro Resources staff

LEGEND

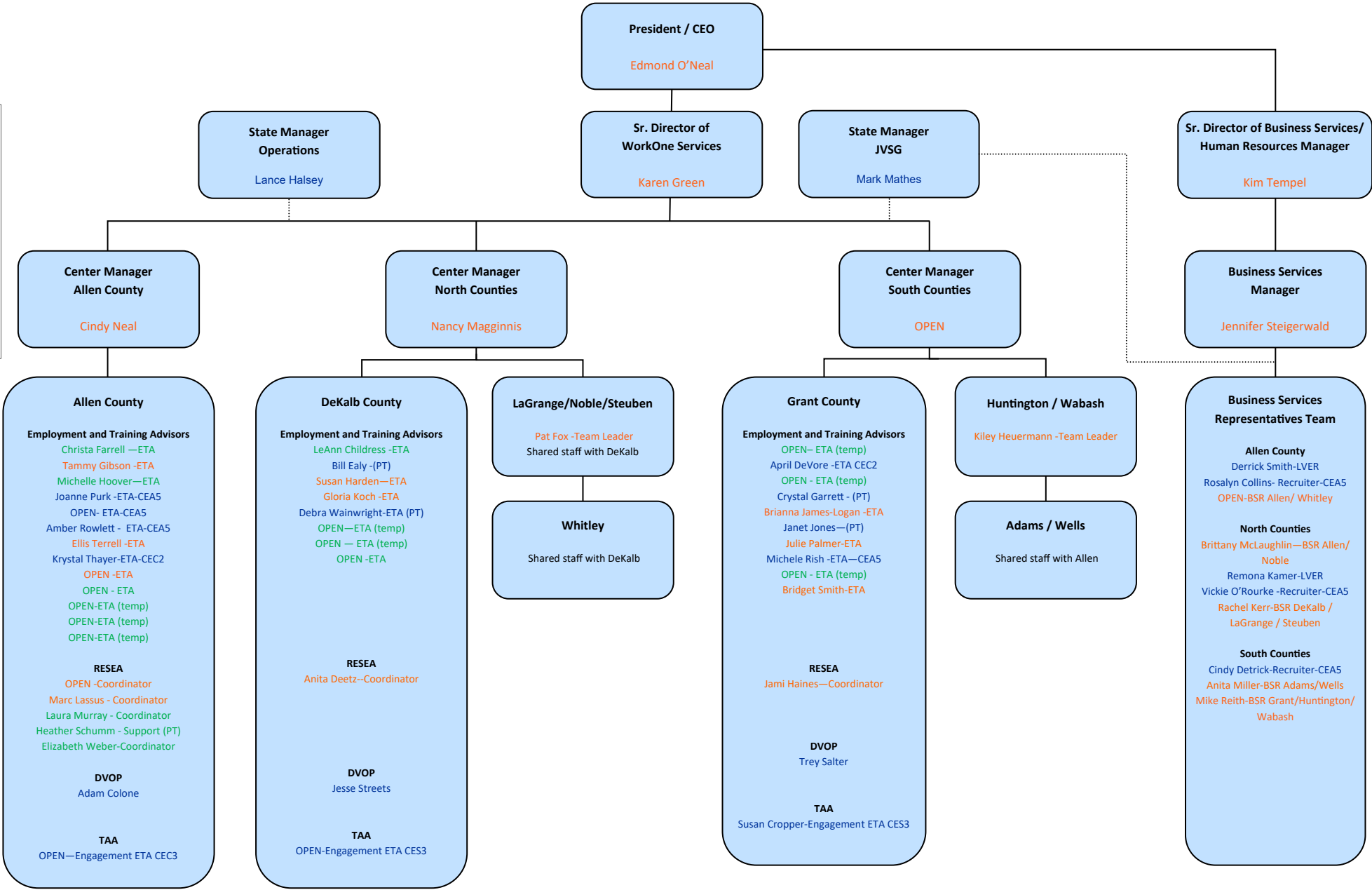
BSR—Business Services Representative

CEO—Chief Executive Officer

ETA—Employment & Training Advisor

PT—Part-time

Temp—Temporary



Northeast Indiana Works Service Providers Organizational Chart

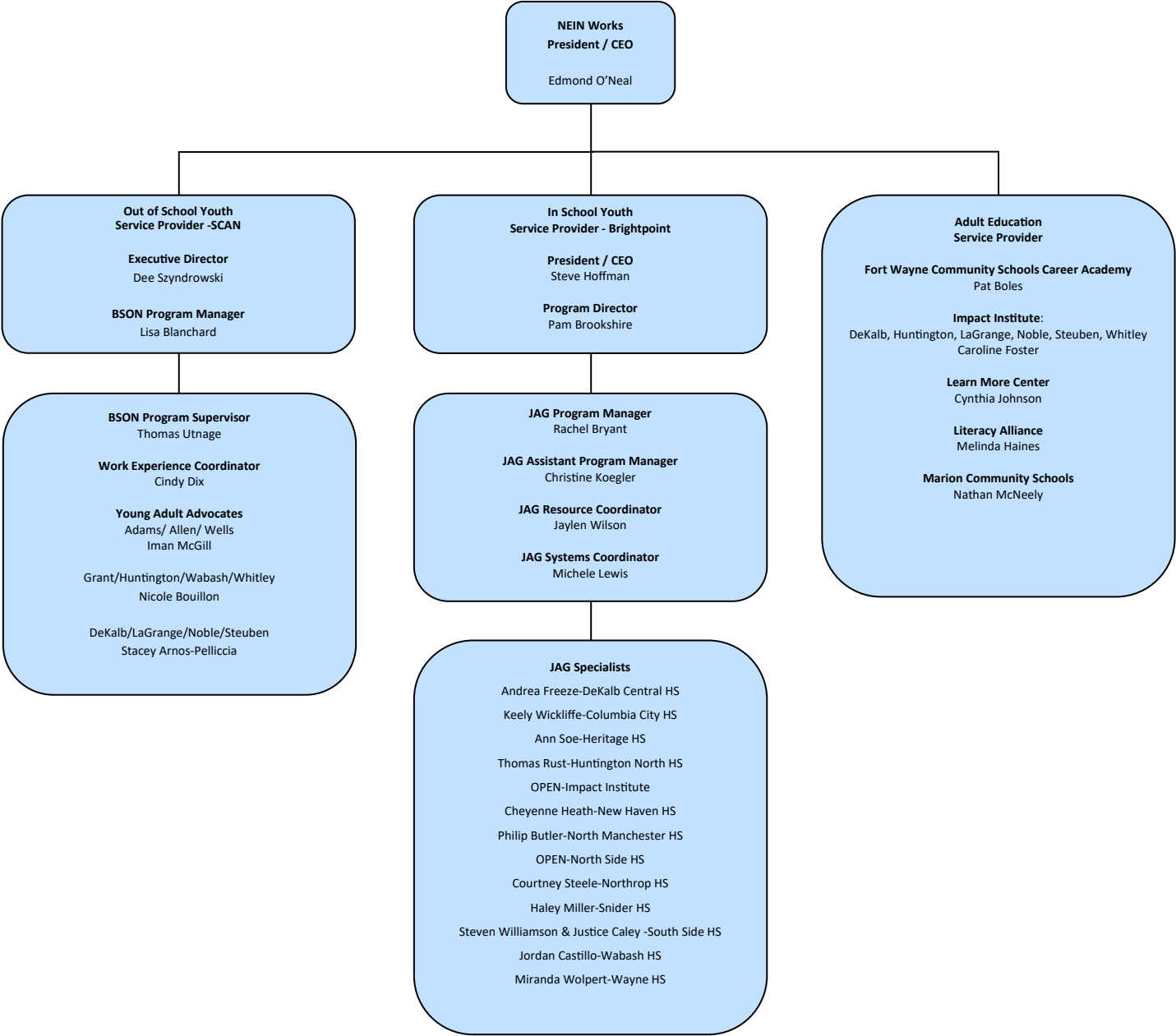
LEGEND

BSON—Be SomeOne Now

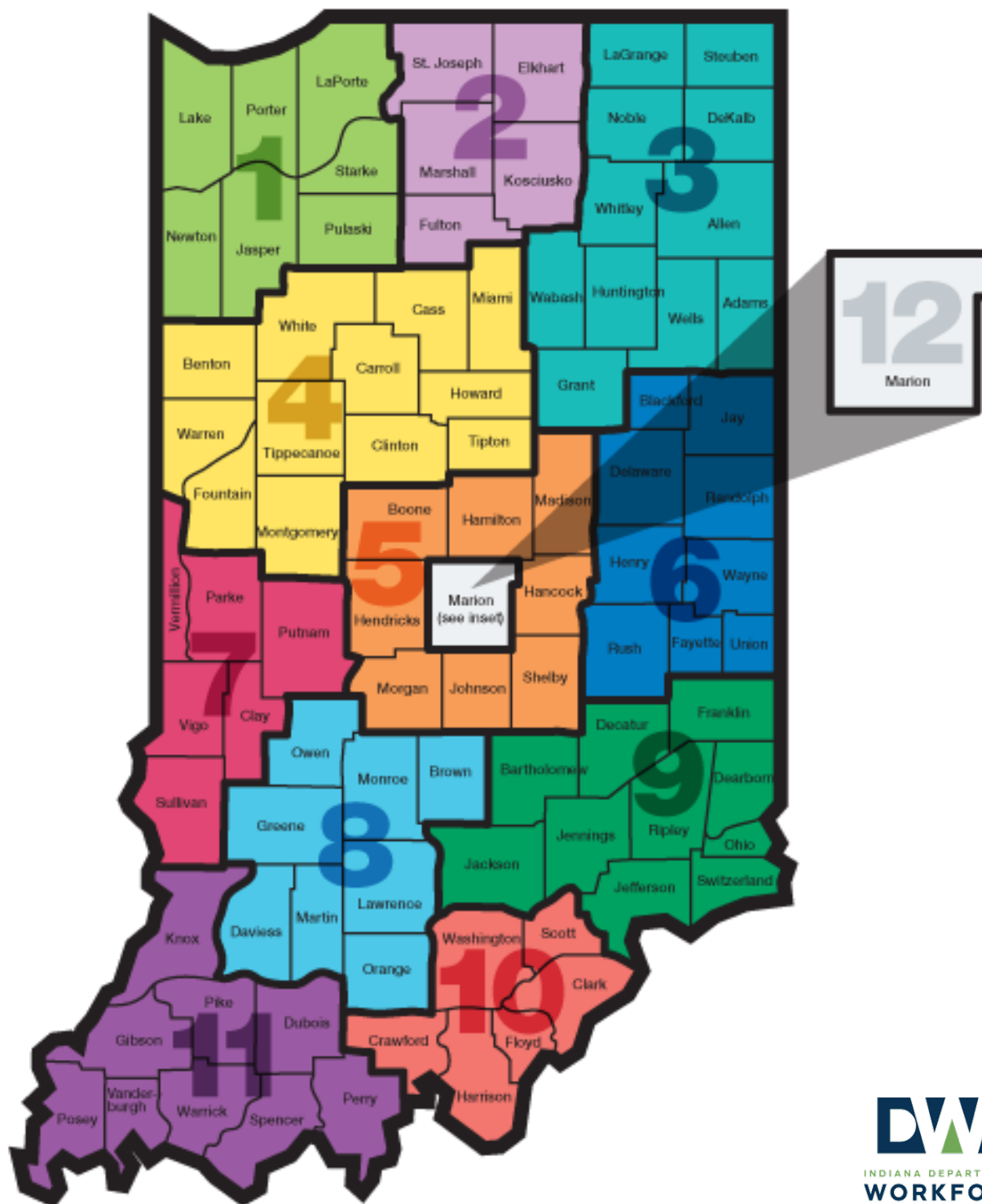
CEO—Chief Executive Officer

JAG—Jobs for America’s Graduates

NEIN Works—Northeast Indiana Works



Indiana LWDAs





To: Indiana's Workforce System

From: Regina Ashley, Chief Strategy Officer

Date: March 20, 2017

Subject: DWD Policy 2016-09
Equal Opportunity and Nondiscrimination Guidance Letter

Purpose

To provide initial guidance regarding the observance and enforcement of the nondiscrimination and equal opportunity provisions of the Workforce Innovation and Opportunity Act (WIOA) and its implementing regulations found at 29 CFR Part 38.

References

- WIOA Section 188
- 29 CFR Part 38, "Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act" Final Rule (January 3, 2017)

Rescission

- DWD Policy 2012-04, dated September 17, 2012, and entitled, "Nondiscrimination and Equal Opportunity Requirements of the Workforce Investment Act"
- DWD Policy 2012-05, dated September 17, 2012, and entitled, "WIA Equal Opportunity Notice and Posting Requirements within the Workforce Investment System"
- DWD Policy 2007-30, dated April 4, 2008, and entitled, "Ensuring Nondiscrimination and Equal Opportunity to Persons with Disabilities Participating in Programs and Activities in the WorkOne Delivery System"
- DWD Policy 2007-31, dated April 4, 2008, and entitled, "Equal Opportunity Monitoring for the Workforce Investment Act (WIA) Title I"
- DWD Policy 2006-19, dated April 4, 2007, and entitled, "Policy Guidance for Ensuring Access to Services for Persons with Limited English Proficiency."

Background

All WIOA Title I recipients (Recipients), defined at 29 CFR 38.4, are responsible for ensuring equal opportunity (EO) and nondiscrimination in programs and activities funded in whole or in part under WIOA. Specifically, recipients must comply with all nondiscrimination requirements in the administration and operation of programs, activities, and employment as provided by WIOA Section 188 and its implementing regulations under the 29 CFR Part 38 (Final Rule). The requirements apply to all programs and activities that are operated by One-Stop partners, as defined in WIOA section 121(b), as part of the One-Stop delivery system (the WorkOne system).

The Final Rule became effective on January 3, 2017. This Guidance is intended to provide an initial summary of the major content areas covered in the Final Rule and includes important procedures recipients must follow to maintain compliance. Additional guidance will be issued as available.

Guidance

WIOA Section 188 prohibits discrimination on the basis of race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title I-financially assisted program or activity.

The following requirements are found in the Final Rule:

A. Notice and Communication (38.34 – 38.40)

- a. **EO Poster.** Each Recipient must provide initial and continuing notice that it does not discriminate on any prohibited basis. Appropriate steps must be taken to ensure that communications with individuals with disabilities are as effective as communications with others and that this notice is provided in appropriate languages to ensure meaningful access for limited English proficient (LEP) individuals.

The Final Rule provides exact language for the *Equal Opportunity Is the Law* notice/poster (the EO Poster). This language cannot be altered except to include the Recipient's Local EO Officer information. **The EO Poster must be initially published within 90 days of January 3, 2017.** The language of the new EO Poster is included in this Guidance for convenience as **Attachment A**. The EO Poster can be found in multiple languages on the Civil Rights Center's website in a fillable, printable pdf format.

The direct link to the English EO Poster is:

https://www.dol.gov/oasam/programs/crc/pdf/EO_Notify_WIOA_English.pdf

Links to the EO Poster in other languages can be found at:

<https://www.dol.gov/oasam/programs/crc/external-compliance-assistance.htm>

The EO Poster must:

- be posted prominently, in reasonable numbers and places, in available and conspicuous physical locations and on recipients' website pages;
- disseminated in internal memoranda and other written or electronic communications with staff;

- included in employee handbooks or manuals;
- provided to each participant and employee and made a part of each participant and employee file;
- provided in appropriate formats for the visually impaired and record of such alternate format in participant or employee file; and
- provided in appropriate languages other than English.

- b. **EO Tagline and Relay Service.** All publications, broadcasts, and other communications must include that the program or activity in question is an “equal opportunity employer/program” and that “auxiliary aids and services are available upon request to individuals with disabilities.”

Where such communications indicate that the Recipient may be reached by telephone, the materials must provide the telephone number of the text telephone (TTY) number or equally effective telecommunications system, such as a relay service, videophone, or captioned telephone.

- c. **Orientations.** Any WIOA Title I orientation for new participants, employees, or the general public must include a discussion of rights and responsibilities under the EO and nondiscrimination provisions of WIOA and the Final Rule, including the right to file a complaint. This information must be communicated in appropriate languages and accessible formats.
- d. **Affirmative Outreach.** Recipients must take appropriate steps to ensure that they are providing equal access to WIOA Title I-financially assisted programs and activities. These steps should involve reasonable efforts to include members of the various protected groups, including, but not limited to persons of different sexes, various racial and ethnic/national origin groups, various religions, LEP individuals, individuals with disabilities, and individuals in different age groups.

Examples of affirmative outreach efforts:

- Targeting specific populations when advertising programs/services
- Sending information to schools or community service groups that serve various populations
- Consulting with community service groups on ways to improve outreach and service

B. Equal Opportunity Officers (38.28 – 38.33)

Every Recipient, except small recipients (defined as serving fewer than 15 beneficiaries during an entire grant year and employing fewer than 15 employees on any given day) and service providers, must designate an EO Officer with adequate knowledge, skills, and abilities to ensure EO/Nondiscrimination in the administration and operation of programs and services. An EO Officer must be a senior level employee with sufficient authority, staff, resources, and training to fulfill his/her responsibilities and maintain competency. The EO Officer must not have other responsibilities that create a conflict or the appearance of a conflict with EO responsibilities.

The State EO Officer’s responsibilities include, but are not limited to:

- Overseeing the development and implementation of the state’s Nondiscrimination Plan (NDP);
- Serving as the state’s liaison with CRC;

- Monitoring compliance of WIOA Title I EO and nondiscrimination requirements;
- Undergoing training and providing training and technical assistance to Local EO Officers; and
- Developing procedure for and investigating discrimination matters that rise to the state level.

The Local EO Officer's responsibilities include, but are not limited to:

- Reporting EO/Nondiscrimination matters to the State EO Officer;
- Processing and investigating regional discrimination complaints;
- Monitoring compliance of regional WIOA Title I recipients;
- Undergoing training and providing training for staff and service providers (participation required for quarterly conference calls and training sessions conducted by DWD's State EO Officer);
- Surveying WorkOne offices to ensure compliance with applicable accessibility requirements;
- Reviewing the Region's policies to ensure they are nondiscriminatory;
- Conducting outreach and education about EO and nondiscrimination requirements and how an individual may file a complaint; and
- Ensuring overall implementation of the NDP.

The EO Officer's name, position title, address, and telephone number (voice and TDD/TTY) must be made public, with the EO Officer's identity and contact information listed on all internal and external communications about the Recipient's nondiscrimination and equal opportunity programs. Changes regarding a Recipient's EO Officer must be updated in all areas where the information is published. Updated contact information must also be forwarded to the State EO Officer at EO@dwd.in.gov.

C. Language Services (38.9)

Recipients must take reasonable steps to ensure meaningful access to LEP individuals via every delivery method (written, electronic, and in person). Such steps may include, but are not limited to:

- Assessment to determine language assistance needs
- Outreach to LEP communities to improve service delivery in needed languages
- Oral interpretation or written translation

Recipients must provide adequate notice to LEP individuals of the existence of interpretation and translation services and that these services are available free of charge. Language assistance services must be accurate and provided in a timely manner.

Recipients shall not require an LEP individual to provide their own interpreter, nor rely on an LEP individual's minor child or adult family or friend except in emergency situations. An accompanying adult may interpret or facilitate communication when the information conveyed is of minimal importance or when the LEP individual specifically requests the accompanying adult to provide language assistance. When the Recipient permits the accompanying adult to provide such assistance, it must be documented that the LEP individual decided to use their own interpreter.

Even where an LEP individual elects to use their own interpreter, a Recipient has the option to provide an independent interpreter where precise, complete, and accurate information is critical, or where the competency of the LEP individual's requested interpreter is not established.

For languages spoken by a significant amount of the eligible population to be served, or likely to be encountered, Recipients must translate vital information in written materials and have them readily

available in hard copy, upon request, or electronically. Even where languages are not spoken by a significant amount of the eligible population, Recipients must take reasonable steps to meet the particularized language needs of LEP individuals. The Final Rule does not specify what constitutes a "significant amount", but rather stresses that providing meaningful access to the LEP population should be handled at the Recipient level based upon the circumstances found in their local area. The Appendix to Section 38.9 of the Final Rule provides further insight into strategy and practice and is a valuable resource surrounding this topic.

Vital information means information that is necessary for an individual to understand how to obtain any aid, benefit, service, and/or training; necessary to obtain any aid, benefit, service, and/or training; or required by law. Examples include, but are not limited to applications, consent and complaint forms, and notices of rights and responsibilities.

All communications of vital information must include a "Babel notice," which is a short notice included in a document or electronic medium in multiple languages informing the reader that the communication contains vital information, and explaining how to access language services to have the contents of the communication provided in other languages.

D. Assurances (38.25 – 28.27)

Each application for financial assistance under WIOA Title I must include the assurance language found included in this Guidance as **Attachment B**.

The assurance is considered incorporated by operation of law in the grant, cooperative agreement, contract or other arrangement whereby Federal financial assistance under Title I of WIOA is made available, whether it is explicitly incorporated in such document and whether there is a written agreement between the Department and the recipient, between the Department and the Governor, between the Governor and the recipient, or between recipients. The assurance also may be incorporated in such grants, cooperative agreements, contracts, or other arrangements by reference.

In lieu of including the assurance language in its entirety for smaller contracts or agreements (such as OJT contracts, etc.), the following reference to the language may be used:

"The equal opportunity and nondiscrimination assurances at 29 CFR Part 38.25 apply to this contract/agreement."

E. Accessibility and Reasonable Accommodation (38.12 – 38.14)

- a. **Physical Accessibility.** Recipients must ensure that their facilities are accessible and usable by individuals with disabilities. Recipients must meet applicable accessibility obligations under Section 504 of the Rehabilitation Act and the implementing regulations at 29 CFR Part 32 and the Americans with Disabilities Act (ADA).
- b. **Programmatic Accessibility.** All WIOA Title I programs and activities must be programmatically accessible, which includes providing reasonable accommodations for individuals with disabilities, making reasonable modifications to policies, practices, and procedures, administering programs in the most integrated setting appropriate, communicating with

persons with disabilities as effectively as with others, and providing appropriate auxiliary aids or services, including assistive technology devices and services, where necessary.

- c. **Reasonable Accommodations and Modifications.** Recipients must provide reasonable accommodations to qualified individuals with disabilities unless providing the accommodation would cause undue hardship.

A qualified individual with a disability, with respect to aid, benefits, services, or training, is an individual who, with or without auxiliary aids and services, reasonable accommodations, and/or reasonable modifications in policies, practices and procedures, meets the essential eligibility requirements; or, with respect to employment, an individual who satisfies the requisite skill, experience, education, and other job-related requirements, with or without reasonable accommodation can perform the essential functions of such position.

Reasonable accommodation includes, but is not limited to:

- Making existing facilities readily accessible and usable;
- Restructuring of a job or service, or of the way in which aid, benefits, services, or training is/are provided;
- Part-time or modified work or training schedules;
- Acquisition or modification of equipment or devices;
- Appropriate adjustment or modifications of examinations, training materials, or policies;
- Provision of readers or interpreters

Undue hardship means significant difficulty or expense incurred by a Recipient. Factors to be considered in determining whether a reasonable accommodation would impose an undue hardship on a Recipient include:

- Nature and cost of accommodation needed;
- Overall financial resources of the facility;
- Overall financial resources of the Recipient;
- Type of operations of the Recipient; and
- Impact of the accommodation upon the operation of the facility

F. Data and Information Collection and Maintenance (38.41 – 38.45)

- a. **Data Collection.** Recipients must collect EO data for applicants, registrants, eligible applicants/registrants, participants, terminees, employees, and applicants for employment and record the race/ethnicity, sex, age, and where known, disability status. Beginning on January 3, 2019, each Recipient must also record LEP and preferred language.

Data collected must be stored in a manner that ensures confidentiality and used only for purposes of:

- Recordkeeping and reporting;
- Determining eligibility for WIOA Title I programs or activities;
- Determining the extent to which the recipient is operating its WIOA programs and activities in a nondiscriminatory manner; or
- Other uses authorized by law.

Any medical or disability-related information must be collected on separate forms and maintained in separate files apart from any other information about the individual. This information must be treated as confidential and locked or otherwise secured (for example, through password protection).

Records must be maintained for a period of not less than three years from the close of the applicable program year.

- b. Complaint Logs.** Recipients must maintain a log of complaints filed with the Recipient that allege discrimination on the basis(es) of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin, age, disability, political affiliation or belief, citizenship, and/or participation in a WIOA Title I-financially assisted program or activity.

The log must include the name and address of complainant, basis of complaint, a description of the complaint, the date the complaint was filed, the disposition and date of disposition of the complaint, and other pertinent information. Recipients must submit their complaint logs on a quarterly basis to DWD's EO Officer at EO@dwd.in.gov. Logs must cover the Recipient's entire Region and are due on or before the following dates: April 5, July 5, October 5, and January 5.

G. Complaint Processing Procedures (38.69 – 38.85)

- a. Complaints.** A complainant may file a complaint by completing and submitting CRC's Complaint Information and Privacy Act Consent Forms, which may be obtained either from the Recipient's EO Officer or from CRC. Complaints must be filed in writing, either electronically or in hard copy, and must contain the following information:
- Complainant's name, mailing address, and if available, email address (or another means of contact);
 - Identity of respondent;
 - Description of allegations;
 - Written or electronic signature of the complainant or complainant's representative;
- b. Complaint Processing.** A Recipient's procedures must state that the Recipient will issue a written Notice of Final Action on complaints within 90 days of the date on which the complaint is filed. The procedure must include, at a minimum, the following elements:
- Initial, written notice to complainant acknowledging receipt of complaint, notice of complainant's right to representation, notice of rights contained in the EO Poster, and notice that complainant has the right to request and receive, at no cost, auxiliary aids and services, language assistance services, and that this notice will be translated as required;
 - Written statement of the issue(s), provided to complainant, that includes a list of issues raised in the complaint and whether the Recipient will accept or reject each issue;
 - Period for fact-finding or investigation;
 - Period for attempt to resolve complaint, including provision for alternative dispute resolution (ADR);
 - Written Notice of Final Action provided to complainant within 90 days of filing date.

If the Recipient issues its Notice of Final Action before the 90-day period ends, but the complainant is dissatisfied with the Recipient's decision, the complainant may file a complaint with the CRC Director within 30 days after the date on which the Complainant receives the Notice.

If, by the end of 90 days from the filing date, the Recipient has failed to issue a Notice of Final Action, the complainant may file a complaint with the CRC Director within 30 days of the expiration of the 90-day period (i.e., within 120 days of filing date).

H. Compliance Monitoring (38.51)

EO Officers, at both the State and Local level, are responsible for annually monitoring all services, programs, and activities to ensure compliance with WIOA Section 188 and the Final Rule. Such monitoring must include:

- A statistical or other quantifiable analysis of records and data kept by Recipients, including analyses by race/ethnicity, sex, LEP, age, and disability status;
- An investigation of any significant differences noted in the analyses to determine whether these differences appear to be caused by discrimination; and
- An assessment to determine whether the Recipient has fulfilled its administrative obligations under WIOA Section 188 and the Final Rule (e.g., recordkeeping, notice and communication), and any duties assigned to it under the NDP.

I. Corrective Actions/Sanctions (38.86 – 38.115)

Corrective actions, or sanctions if voluntary efforts in seeking compliance fail, may be imposed for violations of the EO/Nondiscrimination requirements. Corrective actions are to be designed to completely address each violation and may result from an EO/Nondiscrimination monitoring review, a discrimination complaint, or both. Recipients must have procedures in place for obtaining prompt corrective action. Local EO Officers must notify the State EO Officer of violations discovered, corrective actions implemented, and timeframes for completion.

If the State EO Officer determines a violation has occurred, the Recipient will be notified and a corrective action plan will be developed. Corrective actions should be completed by the date(s) provided by the State EO Officer. If a Recipient does not undertake the corrective actions specified, a conciliation agreement should be initiated and completed based on the model outlined in the Final Rule.

Sanctions will be considered as a last resort. Sanctions may be necessary when a Recipient refuses to implement voluntary corrective action, submit requested data or documentation, or refuses to provide access to premises or records during an EO/Nondiscrimination compliance review. Sanctions that may be imposed include, but are not limited to:

- Termination of future funding;
- Disallowance of selected costs;
- Restriction from bidding on competitive or discretionary funds; and
- Reduction in funding.

At the Local level, Recipients and Local EO Officers will follow the above procedures for applying corrective actions and sanctions.

Effective Date

Immediately

Ending Date

Upon Rescission

Contact for Questions

EO@dwd.in.gov

Action

Recipients must ensure that the nondiscrimination and equal opportunity requirements outlined in this guidance are followed within their respective region.

Attachments

- A: Equal Opportunity is the Law Notice/Poster
- B: Required Assurance Language

Attachment A

Equal Opportunity Is the Law

It is against the law for this recipient of Federal financial assistance to discriminate on the following bases: Against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I-financially assisted program or activity.

The recipient must not discriminate in any of the following areas: Deciding who will be admitted, or have access, to any WIOA Title I financially assisted program or activity; providing opportunities in, or treating any person with regard to, such a program or activity; or making employment decisions in the administration of, or in connection with, such a program or activity.

Recipients of federal financial assistance must take reasonable steps to ensure that communications with individuals with disabilities are as effective as communications with others. This means that, upon request and at no cost to the individual, recipients are required to provide appropriate auxiliary aids and services to qualified individuals with disabilities.

What To Do If You Believe You Have Experienced Discrimination

If you think that you have been subjected to discrimination under a WIOA Title I-financially assisted program or activity, you may file a complaint within 180 days from the date of the alleged violation with either:

Recipient's Local Equal Opportunity Officer or
INSERT LOCAL EO INFO HERE - The
recipient's Equal Opportunity Officer (or
the person whom the recipient has
designated for this purpose)

The Director, Civil Rights Center (CRC)
U.S. Department of Labor
200 Constitution Avenue NW.
Room N- 4123
Washington, DC 20210

or electronically as directed on the CRC Web site at www.dol.gov/crc.

If you file your complaint with the recipient, you must wait either until the recipient issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center (see address above). If the recipient does not give you a written Notice of Final Action within 90 days of the day on which you filed your complaint, you may file a complaint with CRC before receiving that Notice. However, you must file your CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which you filed your complaint with the recipient). If the recipient does give you a written Notice of Final Action on your complaint, but you are dissatisfied with the decision or resolution, you may file a complaint with CRC. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action

Attachment B

Required Assurance Language (38.25)

(1) Each application for financial assistance, under Title I of WIOA, as defined in § 38.4, must include the following assurance:

- (i) As a condition to the award of financial assistance from the Department of Labor under Title I of WIOA, the grant applicant assures that it has the ability to comply with the nondiscrimination and equal opportunity provisions of the following laws and will remain in compliance for the duration of the award of federal financial assistance:
 - (A) Section 188 of the Workforce Innovation and Opportunity Act (WIOA), which prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or against beneficiaries on the basis of either citizenship status or participation in any WIOA Title I financially assisted program or activity;
 - (B) Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the bases of race, color and national origin;
 - (C) Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;
 - (D) The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age; and
 - (E) Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs.
- (ii) The grant applicant also assures that, as a recipient of WIOA Title I financial assistance, it will comply with 29 CFR part 38 and all other regulations implementing the laws listed above. This assurance applies to the grant applicant's operation of the WIOA Title I-financially assisted program or activity, and to all agreements the grant applicant makes to carry out the WIOA Title I-financially assisted program or activity. The grant applicant understands that the United States has the right to seek judicial enforcement of this assurance.



JOB DESCRIPTION

State Form 52468 (12-05)

This document is used to provide a basic description of essential duties and other work elements.

Employee Name: Jennifer Long (PCN 10001393)	
Agency: Department of Workforce Development	BU: 00510
Division: Compliance and Policy	Section/District: 191005
Job Title: Program Director 1	Job Code: 002WM1
Working Title (if different from above): Equal Opportunity Officer	
Reports To: Connie Wray, Associate Chief, Compliance & Policy	
FLSA Status: <input type="checkbox"/> Non-Exempt (OT Eligible) <input checked="" type="checkbox"/> Exempt	Effective Date: 2020

Purpose of Position/Summary:

The functions of this position are multifaceted, with the main focus being to ensure that the Department of Workforce Development (DWD), as well as all boards and one-stop operators/providers/partners within Indiana's Workforce Investment system, comply with federal, state, and/or agency issued laws, regulations, policies, and procedures regarding universal access and equal opportunity (EO) in programs and activities funded in whole or in part under the Workforce Innovation and Opportunity Act (WIOA). This position reports to the Associate Chief of Compliance and Policy.

Essential Duties/Responsibilities:

- Coordinate federally mandated functions for Indiana under WIOA Section 188 and 20 CFR Part 38, including, but not limited to:
 - Monitor and investigate the state's activities through DWD, and the activities of the entities that receive WIOA Title I—financial assistance from DWD to make sure that the state and sub-recipients are not violating their nondiscrimination and equal opportunity obligations;
 - Create and publish the state's procedures for processing discrimination complaints;
 - Conduct outreach and education about equal opportunity and nondiscrimination requirements;
 - Develop, implement, and revise the state's Nondiscrimination Plan under §38.54.
 - Lead the collection and analysis of EO data and information;
 - Evaluate processes for affirmative outreach to expand access to services in order to ensure equal opportunity.
- Serve as DWD's subject matter expert regarding EO/Nondiscrimination/Accessibility under WIOA and other applicable federal and state laws, rules, and regulations, including, but not limited to: Title VII of the Civil Rights Act, the Americans with Disabilities Act (ADA), the ADA Amendments Act, and Title IX of the Education Amendments of 1972;
- Plan and implement DWD's state level monitoring of sub-recipients for EO and Accessibility Compliance on an annual basis;
- Develop and conduct EO/Nondiscrimination/Accessibility training for local EO Officers, state staff and/or other partners;
- Plan and implement marketing and outreach strategies to meet the affirmative outreach requirements as required in the regulations;
- Review statewide and local process and architecture to coordinate and ensure programmatic and physical accessibility;
- Act as technical and enforcement consultant to local-level EO Officers;
- Serve as liaison between DWD, the US Department of Labor (DOL), and Civil Rights Center (CRC);
- Review state and local level written policies to ensure they are nondiscriminatory;
- Develop EO/Nondiscrimination/Accessibility policies and procedures and assist in strategic planning and policy matters in related areas;
- Report EO matters to ROC Director;
- Undergo training as needed to maintain competency;
- Perform other duties as assigned.

Job Requirements:

- Broad knowledge of WIOA's EO requirements and requirements of 29 CFR Part 38;
- Extensive knowledge of all source materials and references, including federal and state laws governing WIOA and EO/Nondiscrimination programs that are federally funded and administered by DWD and its sub-recipients;
- Working knowledge of the organization of DWD and of state and federal agencies dealing with the CRC and DOL guidelines;
- Ability to comprehend, analyze, interpret, and correlate very technical material and develop and implement new principles and policies;
- Ability to work independently and effectively communicate orally and in writing concerning compliance, training, and evaluation methods;
- Ability to maintain effective working relationships with federal, state and local agencies and personnel;
- Remain current on new and developing law, regulations, policies, or standards, as applicable;
- Ability and willingness to travel statewide and stay overnight, as needed, to conduct business.

Supervisory Responsibilities/Direct Reports:

Currently one direct report, Program Director 2 classification/Compliance Specialist. Also has functional oversight of local-level EO Officer EO-related activities.

Difficulty of Work:

Incumbent exercises considerable knowledge, extensive judgment and interpretation, and appropriate application of federal, state and local guidelines, laws, regulations, statutes, promulgated rules, policies, procedures, practices, and precedents, and utilizes organizational, planning, trouble-shooting and problem solving skills. Highly developed analytical and organizational skills, diplomacy, professionalism and discretion are required. The work is broad in scope and the job is complex, sometimes involving highly confidential and sensitive subject matter. The work involves changing laws and guidelines and the continual development and revision of procedures to maintain agency compliance, efficiency and effectiveness. Incumbent must often work independently and within short time constraints.

Responsibility:

The Department of Labor Civil Rights Center (DOL/CRC) issued updated regulations to implement WIOA Section 188. These regulations, found at 29 CFR Part 38, became effective on January 3, 2017 and mandate that each state designate a state-level Equal Opportunity (EO) Officer. Per the regulations, the incumbent must have sufficient expertise, authority, staff, and resources to carry out their EO responsibilities. As DWD's EO subject matter expert, incumbent has technical authority for all EO related issues, pending final approval by the ROC Director. Incumbent has direct access to DWD Commissioner, as the Governor's EO oversight designee, when required.

Incumbent actions, statements, recommendations and decisions may significantly impact agency or workforce development partner operations, programs or funding. The incumbent is charged with the authoritative application of federally mandated EO requirements, and errors in judgment may reflect negatively on image, reputation and credibility, may jeopardize funding, or may otherwise have an adverse fiscal or operational impact on the workforce development partners, DWD or the State of Indiana.

Personal Work Relationships:

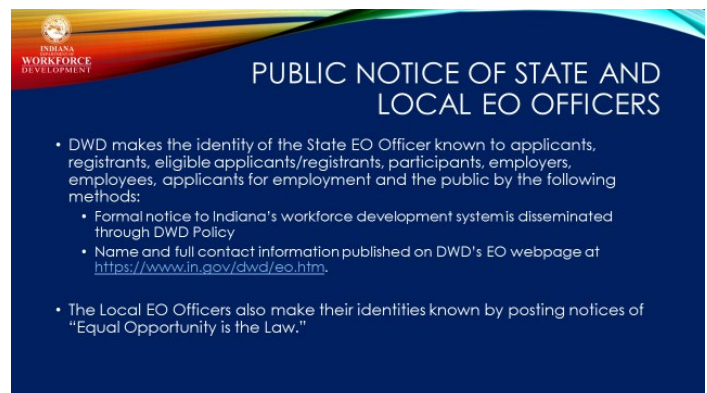
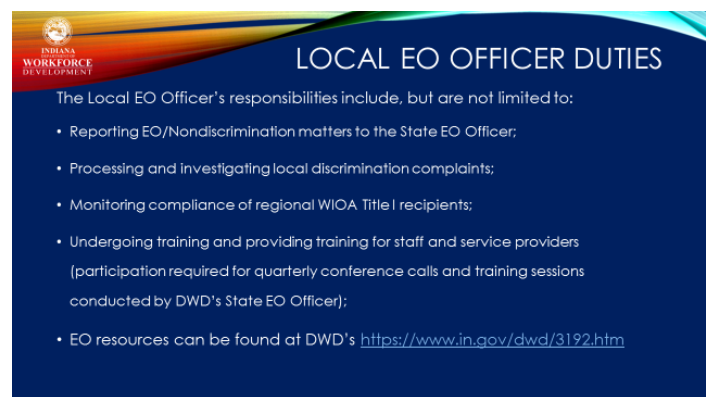
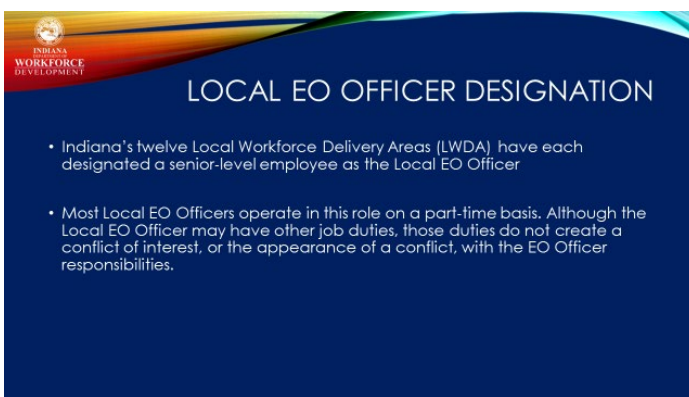
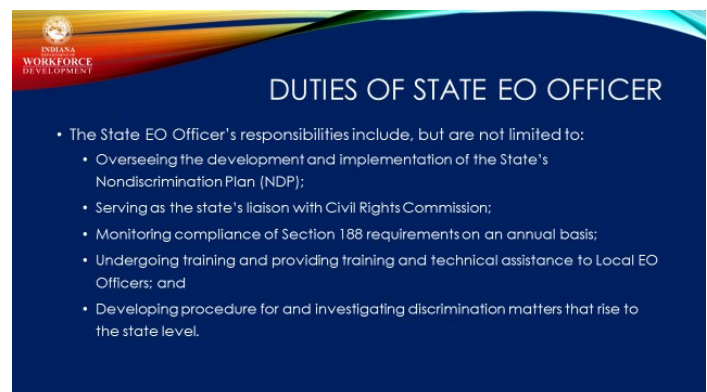
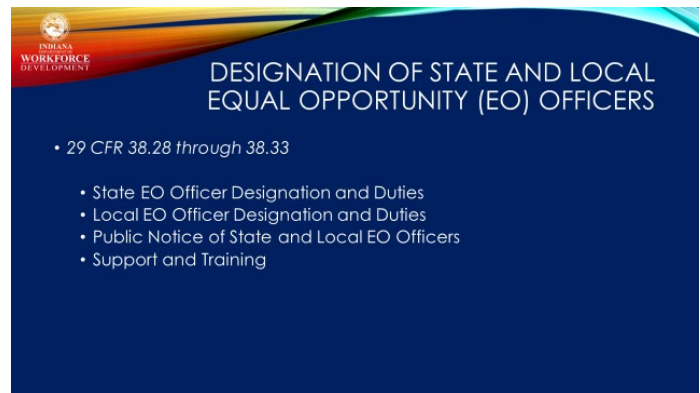
Incumbent works closely with the ROC Director, ROC Monitoring staff, and local-level EO Officers, as well as various DWD administrative, program and field operations units, program directors and subject matter experts, and workforce development partner executives, and as needed with agency leadership, federal and state auditors, etc. The incumbent builds and maintains rapport and fosters interpersonal relationships with all federal, state and local partners.

Physical Effort:

Work is performed in a modern office environment using computer equipment and other common office machines. Required statewide travel is typically by car on a reimbursement basis, but may occasionally include out-of-state or air travel for meetings or training.

Working Conditions:

Work is performed in a modern office environment using computer equipment and other common office machines. Required statewide travel is typically by car on a reimbursement basis, but may occasionally include out-of-state or air travel for meetings or training.



SUPPORT AND TRAINING

- The State EO Officer has both operational and administrative support through additional Regulatory Oversight and Compliance (ROC) staff. The State EO Officer and staff design and implement various training and technical assistance methods to support the Local EO Officers.
- When a new individual is designated as a Local EO Officer, the State EO Officer provides them with the necessary training and resources to carry out their responsibilities.
- The State EO Officer hosts quarterly conference calls where the Local EO Officers are required to participate to discuss current activity within the twelve LWDAs. These conference calls are used as a vehicle to distribute information, gain insight into training needs for Local EO Officers, and respond to questions from the field.

NDP Element 1 Quiz

<https://www.surveymonkey.com/r/8937NNJ>



JOB DESCRIPTION

Equal Opportunity (EO) Officer/Special Projects

Summary

The EO Officer is designated by NIWB to coordinate its obligation to monitor and evaluate compliance with equal opportunity laws, guidelines, and policies to ensure that practices and contracting arrangements give equal opportunity without regards to race, religion, color, national origin, sex, age, or disability. Also coordinates and keeps record of reports of noncompliance in the cases of equal opportunity complaints.

This individual will also handle special projects involving local disability initiatives, Ticket-to-Work, area resource coordination, and other special projects as assigned by the Vice President of Operations.

Primary Responsibilities

- To review written policies to make sure they are nondiscriminatory
- To ensure that adequate policy and procedure is in place and disseminated according to best practices
- To monitor and investigate entities that receive WIOA Title I funds to ensure compliance
- To conduct outreach and education about equal opportunity and nondiscrimination requirements consistent with EO Regulations
- To provide local staff with EO training and updates in policy and practice
- To develop and publish procedures for processing, tracking, investigating and resolving discrimination complaints filed against recipients
- To disseminate information, in appropriate languages and formats, regarding the procedures for filing a complaint
- To monitor collection of data required to ensure compliance with the nondiscrimination and equal opportunity requirements of WIOA
- To conduct required ADA accessibility surveys to ensure compliance with physical and programmatic accessibility obligations for individuals with disabilities

Knowledge and Abilities

- Is a senior level employee
- Has a solid knowledge of EO Regulations, 29 CFR Part 38

- Has undergone or is willing to undergo mandatory training to maintain competency with WIOA Section 188 and its EO Regulations
- Has the ability to multi-task and see correlation between projects
- Analyze system for better, higher quality programming
- Has good staff management skills
- Is a leader
- Good writing skills
- Takes initiative
- Willing to assist in new and evolving projects
- Willingness to learn new things

Certifications/Experience:

- Bachelor's Degree or higher
- 2-3 years' experience in senior level management
- 2-3 years' experience working with individuals with disabilities



JOB DESCRIPTION

State Form 52468 (12-05)

This document is used to provide a basic description of essential duties and other work elements.

Employee Name: Jennifer Greimann	
Agency: Department of Workforce Development	BU: 00510
Division: Compliance & Policy	Section/District: 191005
Job Title: Program Director 2	Job Code: 002WM2
Working Title (if different from above): Compliance Specialist	
Reports To: Jennifer Long, Equal Opportunity Officer	
FLSA Status: <input type="checkbox"/> Non-Exempt (OT Eligible) <input type="checkbox"/> Exempt	Effective Date: 2019-current

Purpose of Position/Summary:

Incumbent serves under the supervision of the state's Workforce Innovation and Opportunity Act (WIOA) Equal Opportunity (EO) Officer within DWD's Compliance and Policy Division. In this position, the incumbent assists the state EO Officer with DWD's Equal Opportunity and Nondiscrimination requirements mandated under WIOA and other federal regulations. The Compliance Specialist performs research, conducts desk reviews, and monitors compliance of each Local Workforce Development Area (region) to analyze and evaluate regional EO compliance. The Compliance Specialist may also assist with other functions as needed.

Essential Duties/Responsibilities:

- Serve as subject matter expert for DWD regarding WIOA Section 188 (and related laws and regulations).
- Ensure statewide EO compliance by overseeing grant recipient EO activities.
- Assist EO Officer with training curriculum development and implementation of training activities.
- Collaborate with various partners to perform EO oversight functions.
- Perform desktop and on-site compliance reviews.
- Analyze state, regional, and local EO activities to determine compliance with all applicable federal, state and local regulations and guidelines.
- Analyze entity structures, functions and activities.
- Analyze EO data and statistics to identify any issues or trends as part of compliance reviews.
- Conduct research, gather relevant data and appropriate citations, and compile detailed reports.
- Contribute to and assist in the preparation of the various EO-related guides, policies, procedures, worksheets, schedules, and tools.
- Other duties as assigned, including assistance in other areas within the Division as needed.

Job Requirements:

- Bachelor's degree in public policy, public affairs, political science, public administration, social services, business administration or related field preferred.
- Extensive knowledge and familiarity of WIOA Section 188 and 29 CFR Part 38 EO requirements (and other related laws and regulations) at the state, regional, and local level.
- Extensive knowledge of and familiarity with a variety of computerized systems and applications.
- Ability to gather data from a variety of sources and compile detailed reports.
- Ability to read, interpret, and accurately apply appropriate federal, state, and local laws, regulations, guidelines, etc.
- Specialized knowledge and understanding of (or ability to quickly learn) agency organization and federal, state, and local entities associated with the various programs within the EO Compliance scope.
- Specialized knowledge of (or ability to quickly learn) grantee entity structures, activities, and functions.

- Extensive knowledge of Microsoft Office suite (including Excel)
- Working knowledge of basic data analytics and ability to expand that knowledge quickly.
- Ability to effectively communicate verbally and in writing, consistently maintain professionalism and confidentiality, and cultivate positive working relationships.
- Ability and willingness to travel* as needed for work or job training.
- *Travel is usually independent and mostly within the State, with possible occasional overnight travel required.

Supervisory Responsibilities/Direct Reports:

None

Difficulty of Work:

The work is broad in scope involving many complex elements requiring critical and administrative analytical abilities, and the broad interpretation and application of federal, state, and local laws and regulations. Highly developed analytical and organizational skills are required to properly assess and accurately document the EO compliance of grant recipients.

Responsibility:

The Compliance Specialist works under the direction of the EO Officer and also in conjunction with the Division's WIOA Monitoring team. The Compliance Specialist possesses sufficient technical authority for the work. Decisions and major recommendations are reviewed for compliance with federal and state guidelines and attainments of goals. The incumbent makes a substantial contribution to the development, implementation, and execution of the EO compliance effort.

Personal Work Relationships:

Work relationships are with ROC Division staff members and management, various DWD program directors and executives, grant recipients and sub-recipients, regional Local EO Officers, and other federal, state and local officers for the purpose of maintaining and advancing technical competency, thoroughly and accurately executing the various functions within the scope of conducting EO Compliance work, operations and implementations required of the grant recipients by federal and state regulations, and identifying and resolving matters of non-compliance.

Physical Effort/Working Conditions:

Work is performed in a modern office environment. Required statewide or overnight travel is typically by car on a reimbursement basis, but may occasionally include out-of-state travel for training.

DWD: Training Resources x +

in.gov/dwd/compliance-policy/equal-opportunity/training-resources/

IN.gov An official website of the Indiana State Government Accessibility Settings Language Translation Governor Eric J. Holcomb

INDIANA DWD Indiana Department of Workforce Development Search DWD

Home About DWD Job Seekers Businesses Training Services Indiana Unemployment Partners & Regions Data Newsroom

Training Resources

Home DWD Compliance & Policy Equal Opportunity Training Resources

Local EO Officer Training

This training is intended for American Job Center staff.

- [EO Program 101 Training](#)

These presentations reflect the Non Discrimination Plan (NDP) and are for all LWDA EO officers. More trainings will be added as needed as a resource for EO officers and members of the public.

- [State and Local Equal Opportunity Officers](#)
- [Notice and Communication](#)
- [Assurance Language](#)
- [Affirmative Outreach](#)
- [Compliance with Disability Nondiscrimination Requirements](#)
- [Data and Information Collection and Maintenance](#)
- [Monitoring Recipients for Compliance](#)
- [Compliant Processing Procedures](#)
- [Corrective Actions and Sanctions](#)

[Equal Opportunity is the Law. \(La Igualdad De Oportunidad Es La Ley.\)](#)

Equal Opportunity Employer/Program Auxiliary aids and services are available upon request to individuals with disabilities.

Top FAQs

- How do I contact DWD about unemployment insurance?
- What happens after I file my unemployment insurance claim?
- How do I file for unemployment?
- Where can I find unemployment insurance information for employers?

10:14 AM 6/27/2022 81°F Sunny

NDP Local Equal Opportunity Officer Trainings

REGION	1 Nora	2 Melissa	3 Erica	4 Mellisa	5 Cindy	6 Jessica	7 Nikkie	8 Rob	9 Amanda	10 ShiLese	11 Linda	12 Kevin
Element 1	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022
Q1	√	√	√	√	√	√	√	√	√	√	√	√
Q2	√	√	√	√	√	√	√	√	√	√	√	√
Q3	√	√	√	√	√	√	√	√	√	√	√	√
Q4	√	√	√	√	√	√	√	√	√	√	√	√
Element 2	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022
Q1	√	√	√	√	√	√	√	√	√	√	√	√
Q2	√	√	√	√	√	√	√	√	√	√	√	√
Q3	√	√	√	√	√	√	√	√	√	√	√	√
Q4	√	√	√	√	√	√	√	√	√	√	√	√
Element 3	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022
Q1	√	√	√	√	√	√	√	√	√	√	√	√
Q2	√	√	√	√	√	√	√	√	√	√	√	√
Q3	√	√	√	√	√	√	√	√	√	√	√	√
Element 4	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022
Q1	√	√	√	√	√	√	√	√	√	√	√	√
Q2	√	√	√	√	√	√	√	√	√	√	√	√
Q3	√	√	√	√	√	√	√	√	√	√	√	√
Q4	√	√	√	√	√	√	√	√	√	√	√	√
Element 5	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022
Q1	√	√	√	√	√	√	√	√	√	√	√	√
Q2	√	√	√	√	√	√	√	√	√	√	√	√
Q3	√	√	√	√	√	√	√	√	√	√	√	√
Q4	√	√	√	√	√	√	√	√	√	√	√	√
Element 6	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022
Q1	√	√	√	√	√	√	√	√	√	√	√	√
Q2	√	√	√	√	√	√	√	√	√	√	√	√
Q3	√	√	√	√	√	√	√	√	√	√	√	√
Element 7	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022
Q1	√	√	√	√	√	√	√	√	√	√	√	√
Q2	√	√	√	√	√	√	√	√	√	√	√	√
Q3	√	√	√	√	√	√	√	√	√	√	√	√


Q4	√	√	√	√	√	√	√	√	√	√	√	√
Element 8	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022
Q1	√	√	√	√	√	√	√	√	√	√	√	√
Q2	√	√	√	√	√	√	√	√	√	√	√	√
Q3	√	√	√	√	√	√	√	√	√	√	√	√
Element 9	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022	1/1/2022
Q1	√	√	√	√	√	√	√	√	√	√	√	√
Q2	√	√	√	√	√	√	√	√	√	√	√	√
Q3	√	√	√	√	√	√	√	√	√	√	√	√

INDIANA
WORKFORCE
DEVELOPMENT

EQUAL OPPORTUNITY 101

Ensuring Equal Opportunity and Nondiscrimination

Department of Workforce Development



INDIANA
WORKFORCE
DEVELOPMENT

WHAT IS EQUAL OPPORTUNITY?

"No individual in the United States may, on the basis of race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or for beneficiaries, applicants, and participants only, on the basis of citizenship or participation in any WIOA Title I-financially assisted program or activity, be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any WIOA Title I-financially assisted program or activity."

-29 CFR 38.5



INDIANA
WORKFORCE
DEVELOPMENT

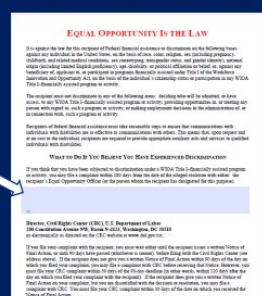
HOW DO YOU ENSURE EO IS BEING PROVIDED?

- Notice and Communication
- Limited English Proficiency
- Affirmative Outreach
- Accessibility
- Addressing Complaints
- Monitoring

INDIANA
WORKFORCE
DEVELOPMENT

NOTICE & COMMUNICATION

- **EO is the Law Notice**
 - **MUST:**
 - Be posted in prominent places around the office, including resource areas, and on web site pages
 - Be included in orientations, registrations, and in both employee and participant handbooks
 - Have the local EO officer's name and contact information
 - Be available in appropriate languages
 - Based on number or proportion of LEP individuals in area
 - Be provided in appropriate formats
 - Example: Large print for visual impairment
 - Be disseminated in internal memos/other written communications with staff
 - Be provided to each participant and employee and be part of their file



INDIANA
WORKFORCE
DEVELOPMENT

NOTICE & COMMUNICATION

- **EO Tagline**

"Equal Opportunity Employer/ Program"
and
"Auxiliary aids and services are available upon request to individuals with disabilities"

Both the above clauses *must* be on all recruitment brochures and other materials that are ordinarily distributed or communicated to staff, clients, or the public

- Includes written, oral, electronic, or paper materials/communications
- Includes materials/communications that describe programs financially assisted under WIOA or the requirements for participating by recipients and participants

INDIANA
WORKFORCE
DEVELOPMENT

LIMITED ENGLISH PROFICIENCY

What is Limited English proficient (LEP):

- An individual whose primary language for communication is not English and who has a limited ability to read, speak, write, and/or understand English
- LEP individuals may be competent in English for certain types of communication, but still be LEP for other purposes
 - Example: A Spanish speaking individual who speaks English well, but cannot read or write in English

Discrimination against LEP individuals falls under national origin – 29 CFR 38.9

INDIANA
WORKFORCE
DEVELOPMENT

LIMITED ENGLISH PROFICIENCY

Vital documents/information

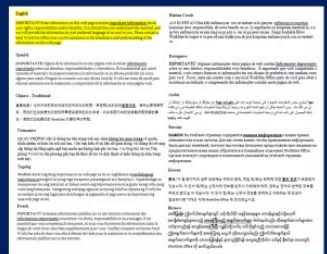
- Information, whether written, oral or electronic, that is necessary for an individual to understand how to obtain any aid, benefit, service, and/or training; or required by law.
- Examples of documents containing vital information include, but are not limited to:
 - Applications, consent and complaint forms
 - Notices of rights and responsibilities
 - Notices advising LEP individuals of their rights under this part, including the availability of free language assistance
 - Rulebooks/Instructions
 - Written tests that do not assess English language competency, but rather assess competency for a particular license, job, or skill for which English proficiency is not required
 - Letters or notices that require a response from the beneficiary or applicant, participant, or employee

INDIANA
WORKFORCE
DEVELOPMENT

LIMITED ENGLISH PROFICIENCY

Vital documents/information – Notice and Translation

- Must be translated into languages spoken by a significant number or portion of population eligible to be served or likely to be encountered.
- **Babel Notice:**
 - A short notice included in a document or electronic medium (e.g., Web site, "app," email) in multiple languages informing the reader that the communication contains vital information, and explaining how to access language services to have the contents of the communication provided in other languages.



INDIANA WORKFORCE DEVELOPMENT

LANGUAGE SERVICES

- **Translation and interpreter services**
 - Vendors: Proprio, Luna, and LTC Language Solutions
 - Cannot require LEP individual to rely on their own interpreter except in emergency situations or if the individual decides to use their own interpreter
 - Recipient can still provide their interpreter when they need to ensure accurate information
 - When a phone number is provided, must be accompanied by telephone number of the text telephone (TTY) or equally effective communication system
 - Any services provided are at no cost to the client

INDIANA WORKFORCE DEVELOPMENT

DISABILITY AND ACCESSIBILITY

- **Physical Accessibility**
 - Facilities must be accessible and usable by individuals with disabilities
 - Review of the center's access to bathrooms, adjustable work stations, and appropriate signage, including signage to meet multilingual needs common to the specific region of the State.
 - Review of the availability of transportation to the American Job Center and access into the site location via ramps consistent with the Americans with Disabilities Act's (ADA) standards.



INDIANA WORKFORCE DEVELOPMENT

DISABILITY AND ACCESSIBILITY

- **Programmatic Accessibility**
 - **Must:**
 - Make modifications to policies, practices, and procedures
 - Provide appropriate auxiliary aids or services
 - Provide reasonable accommodations for individuals with disabilities
 - Administer programs in the most integrated setting appropriate
 - Communicate with persons with disabilities as effectively as with others

INDIANA WORKFORCE DEVELOPMENT

AFFIRMATIVE OUTREACH

- Must make reasonable efforts to include members of the various protected groups, including, but not limited to;
 - Persons of different sexes
 - Various racial and ethnic/national origin groups
 - Various religions
 - Individual with Limited English Proficiency
 - Individuals with disabilities
 - Individuals in different age groups

INDIANA WORKFORCE DEVELOPMENT

AFFIRMATIVE OUTREACH

- Examples of affirmative outreach efforts:
 - Targeting specific populations when advertising programs/services
 - Sending information to schools or community service groups that serve various populations
 - Consulting with community service groups on ways to improve outreach and service

INDIANA WORKFORCE DEVELOPMENT

COMPLAINTS OF DISCRIMINATION

What are regular complaints versus complaints of discrimination?

- **Non-Discrimination Complaint:**
 - I was not approved for a specific training that was not on the approved training provider list or the case manager didn't provide me with accurate information
- **Discrimination Complaint:**
 - I didn't get approved for training because of my age or the case manager didn't provide me an interpreter and therefore she/he discriminated against me because of my language barrier

INDIANA WORKFORCE DEVELOPMENT


COMPLAINTS OF DISCRIMINATION

- Complainant may file a complaint by completing and submitting CRC's Complaint Information and Privacy Act Consent Forms
 - can be obtained from your local Equal Employment Officer or from the Civil Rights Center
- Complaints must be filed in writing (electronically or in hard copy)
- Complaints must contain the following information:
 - Complainant name
 - Complainant mailing address
 - Complainant email address, if available (or another means of contact)
 - Identity of respondent
 - Description of allegations
 - Written or electronic signature of the complainant or complainant's representative

INDIANA WORKFORCE DEVELOPMENT

COMPLAINT PROCESSING PROCEDURES

- Procedure must include the following elements
 - Initial written notice to complainant acknowledging receipt of complaint, right to representation, notice of rights in EO poster, right to request and receive auxiliary aids at no cost, language assistance services
 - Written statement of the issue provided to complainant and whether Recipient will accept or reject each issue
 - Period for investigation
 - Period for attempt to resolve complaint, provision for alternative dispute resolution (ADP)
 - **Written Notice of Final Action**
 - Recipient will issue a written Notice of Final Action on complaints within 90 days of the date on which it was filed
 - **Must include:**
 - Decision on issue and explanation of reasons or description of the way parties resolved the issue
 - Notice of right to file complaint with CRC within 30 days if dissatisfied



MONITORING

- Local Monitoring of Equal Opportunity Program
 - Conducted by your Local EO Officer at each of the WorkOne offices in the region
- Annual Monitoring by State EO Officer
 - DWD Regulatory Oversight and Compliance (ROC) Division will monitor region
- Includes:
 - Structural accessibility, parking for individuals with disabilities, designated restrooms, appropriate signage, program accessibility, and effective communication for persons with disabilities and LEP individuals
 - Desk review of local EO policies, job description of the Local EO Officer, EO Notice requirements, complaint procedures, and contracts, training agreements, and Memoranda of Understanding
 - On-site interviews with local EO officer and assessments of the WorkOne offices



EQUAL OPPORTUNITY OFFICERS

State EO Officer


- Overseeing development and implementation of the state's Nondiscrimination Plan
- Serving as state liaison with CRC
- Monitoring compliance with WIOA Title I EO and nondiscrimination requirements
- Undergoing and providing training and technical assistance to local EO officers
- Developing procedure for and investigating discrimination matters that rise to the state level

Local EO Officer

- Reporting EO matters to the State EO Officer
- Processing and investigating regional discrimination complaints
- Monitoring compliance of regional WIOA Title I recipients
- Undergoing and providing training for staff and service providers
- Surveying WorkOne offices to ensure compliance with accessibility requirements
- Reviewing region's policies to ensure they are nondiscriminatory
- Conducting outreach and education about EO and nondiscrimination requirements and complaint filing process
- Ensuring overall implementation of the NDP




QUESTIONS?



AUTHORITIES

- WIOA Section 188: Nondiscrimination and 29 CFR Part 38
 - <https://www.dol.gov/oasam/programs/crc/external-statutes-regs.htm>
 - <https://www.ecri.gov/cgi-bin/retrieveECFR?go=SID=93578defc0d4f3d553a30c5b63b1edd&mc=true&=PART&n=pt29.1.38>
 - <https://www.dol.gov/agencies/oasam/civilrights-center/statutes/section-188-workforce-innovation-opportunity-act/guide>
- DWD Policy 2014-09: Equal Opportunity and Nondiscrimination Guidance Letter
 - <https://www.in.gov/dwd/files/2014-09.pdf>
- DWD Compliance – Equal Opportunity is the Law
 - <https://www.in.gov/dwd/eo.htm>
- Americans with Disabilities Act
 - <https://www.dol.gov/general/topic/disability/ada>
- Indiana's Nondiscrimination Plan **2018 - 2020**
 - <https://www.in.gov/dwd/3195.htm>




EQUAL OPPORTUNITY DATA ANALYSIS

PY2021

DWD Compliance Team- EO Division
Department of Workforce Development

1



REGULATIONS


29 CFR 38.41(b)

- The state and local workforce development areas must collect data records on applicants, registrants, eligible applicants/registrants, participants, terminees, employees, and applicants for employment with regards to race/ethnicity, sex, age, disability status, limited English proficiency status and preferred language

29 CFR 38.51(b)

- The annual monitoring done by the State EO Officer must include (1) A statistical or other quantifiable analysis of records and data of the above and (2) an investigation of any significant differences identified in the data analysis to determine whether these differences appear to be caused by discrimination

2



PY20 MONITORING ANALYSIS


Analysis presented by Civil Rights Center

Used internal population served (ICC) data

Adverse Impact / 80% Rule Analysis

Race, Disability, Gender for WIOA Adult, DW, and Youth

3




ADVERSE IMPACT

Looks to see if there is a substantially different rate of representation that works to the disadvantage of protected group. (i.e. race, sex, disability status)

If a group's rate of representation is less than 80% of the most favored group, the group is experiencing adverse impact.

4




ADVERSE IMPACT WORKSHEET/SUMMARY

Individualized	Total Enroll	Enroll Served	Training Services	80% Rule	Adverse Impact	80% Rule	Adverse Impact
Gender	100	250	80	75.00%	80.00%	75.00%	80.00%
Male	140	50	30	67.86%	80.00%	67.86%	80.00%
Female	160	150	50	75.00%	80.00%	75.00%	80.00%
Race	200	250	80	75.00%	80.00%	75.00%	80.00%
White	12	7	3	N/A	N/A	N/A	N/A
African American	8	3	1	N/A	N/A	N/A	N/A
Black or African	100	110	40	67.17%	80.00%	67.17%	80.00%
White	3	5	2	N/A	N/A	N/A	N/A
Black or African	35	40	15	85.00%	80.00%	85.00%	80.00%
White	7	5	2	N/A	N/A	N/A	N/A
Black or African	200	250	80	75.00%	80.00%	75.00%	80.00%
Disabled	11	7	3	N/A	N/A	N/A	N/A
Not Disabled	250	250	80	72.00%	80.00%	72.00%	80.00%

ICC Data-WIOA Participants PY19 (Federal Report)

- Significantly less females were enrolled in Training Services than males
- Significantly less Black or African Americans were enrolled in Individualized Career Services than Whites
- Significantly less Whites were enrolled in Training Services than Black or African Americans

5



PY21 MONITORING ANALYSIS

Worksheet provided and recommended by the NASWA EO Subcommittee

Uses overall population (Census) and population served (ICC) data

Standard Deviation Analysis

Race, Ethnicity, Age, Disability, Gender, LEP

6

STANDARD DEVIATION

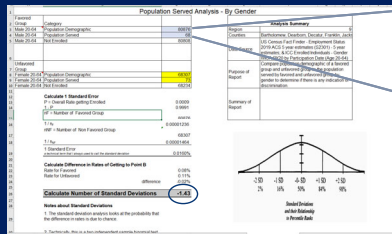
Looks at probability that difference in rates for favored and unfavored groups (those in protected classes) are due to chance. We would expect the LWDA is serving groups of participants at the same rate as those that live in the community.

Differences greater than 2.0 standard deviations is what suggests possible discrimination. We can assume that small differences (small standard deviation) are due to random chance and that large differences are due to outside factors, such as possible discrimination.

If SD is greater than 2.0 there is something influencing the difference because there is less than a 5% probability the difference was caused by chance.

7

STANDARD DEVIATION WORKSHEET



U.S. Census Data – American Community Survey 2019 5 year estimates

ICC Data– Enrolled WIOA Participants PY20

8

ANALYSIS SUMMARY

- Black/African Americans are participating in WIOA at a higher rate than expected based on Census data
- Per Census data, Asian is the 3rd highest race in the LWDA, but no Asian participants
- Older labor force population (55+) are participating in WIOA at a lesser rate than expected based on Census data

Category	Deviation	Possibility of Discrimination / Need for Investigation
Race #1 – Black/African American	-5.16	No
Race #2 - Other	-1.39	No
Race #3 - Asian	2.06	Yes
Ethnicity	-1.24	No
Age	4.51	Yes
Disability	-1.19	No
Gender	-1.43	No
LEP	1.10	No

9

WHAT NOW?

- Look deeper into the data or at other additional data
 - Is the unemployment rate significantly lower for the group you are serving less of? Is this across the LWDA or does it appear to be an issue with one office/county? Is the participation population different than those registering?
- Look at outreach efforts
 - Does your LWDA not have a relationship with an organization in your area that might target the group you are serving less of? Does your LWDA have a presence within this community?
- Look at internal processes
 - Is something prohibiting this group from participating in your programs? (For example – translated documents, computer competency, etc.)

10

ADDITIONAL IMPLICATIONS

- Increase participants through outreach efforts
- Information to make decisions on resource usage
- Provide all-inclusive programs to the community

11

EO Trainings

- Society for Human Resource Management SHRM - Global and Cultural Effectiveness – Addressing Racism
- DOL Policies on LGBTQ+ Employees and Applicants: Rights and Responsibilities Desk Aid - <https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/internal/policies/LGBTQ-deskaid>
- Dol Policies on Gender Identify: Rights and Responsibilities <https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/internal/policies/gender-identity>
- Society for Human Resource Management SHRM - Global and Cultural Effectiveness – Addressing Racism
- DOL Policies on LGBTQ+ Employees and Applicants: Rights and Responsibilities Desk Aid - <https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/internal/policies/LGBTQ-deskaid>
- Dol Policies on Gender Identify: Rights and Responsibilities <https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/internal/policies/gender-identity>
- Society for Human Resource Management SHRM - Global and Cultural Effectiveness – Addressing Racism
- DOL Policies on LGBTQ+ Employees and Applicants: Rights and Responsibilities Desk Aid - <https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/internal/policies/LGBTQ-deskaid>
- Dol Policies on Gender Identify: Rights and Responsibilities <https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/internal/policies/gender-identity>
- Transgender 101 - <https://www.ihs.gov/lgbt/trainings/>
- LinkedIn – 132 results on Diversity and Inclusion: Unconscious Bias, Confronting Bias: Thriving Across Our Differences, Skills for Inclusive Conversations, Communicating across cultures to name a few.

Local EO Officer Getting Started Checklist

- ☐ Review Section 188 of WIOA and 29 CFR Part 38.
- ☐ Review the training presentations and Indiana's Nondiscrimination Plan on DWD's EO Webpage, and notify the State EO Officer when review has been completed.
- ☐ Update Local EO Officer's name and contact information on all *EO is the Law* notices, in the WorkOne offices and on the online version on the LWDA's website.
- ☐ Update Local EO Officer's name and contact information on LWDA's and WDB's websites.
- ☐ Review the Complaint Log and the LWDA's policies/procedures for handling discrimination complaints.
- ☐ Review local EO monitoring procedures and the Local EO Monitoring tool.
- ☐ Assess staff knowledge on EO information and set tentative staff training deadlines/goals.
- ☐ Check in with State EO Officer to discuss any questions or concerns.
- ☐ Explore additional resources as time is available.

I. Overview

- a. Section 188 of WIOA prohibits discrimination against individuals who apply to, participate in, work for, or come into contact with programs and activities that receive financial assistance under Title I of WIOA. This includes programs and activities operated by one-stop partners (both required partners and additional partners) to the extent that these programs and activities are being conducted as part of the one-stop delivery system. The one-stop delivery system is also referred to as the American Job Center (AJC) delivery system and the one-stop Career Center system.

II. Places to Start

- a. DWD EO Webpage can direct you to:
 - i. DWD EO Reference Materials
 - 1. DWD Policy 2016-09
 - 2. EO is the Law poster
 - 3. Complaint Procedures for WIOA Nondiscrimination and Equal Opportunity Provisions
 - 4. Complaint Log
 - 5. EO Data Analysis – Standard Deviation Worksheet
 - 6. Local EO Monitoring tool Example
 - 7. WIOA Section 188 Reference Guide
 - ii. EO Officer Responsibilities & Directory
 - iii. Legislation
 - 1. Section 188 Workforce Innovation & Opportunity Act (WIOA)
 - 2. 29 CFR Part 38
 - 3. Additional links to relevant legislation and regulations
 - iv. Nondiscrimination Plan (NDP)
 - v. Training Resources
- b. Department of Labor – Civil Rights Center

III. State EO Officer

A key contact that will be involved in the equal opportunity activities in each LWDA is Indiana's State EO Officer. The position is currently held by Ms. Jennifer Long, who works with DWD's Compliance and Policy Division to ensure compliance with the nondiscrimination requirements of Section 188 of WIOA and its implementing regulations. The duties of the State EO Officer are outlined in [29 CFR Part 38](#).

At the end of each quarter, the State EO Officer will collect the quarterly complaint logs from each of the twelve LWDAs and conduct a quarterly conference call with all the local EO officers. These calls typically discuss any updates

The local EO Officers will also meet with the State EO Officer during annual on-site monitoring to each of the twelve Local Areas. Using a combination of document review, interviews with the local EO Officers, and visits to the local WorkOne offices, the State EO Officer assesses

- EO officers' responsibilities
- Notice and Communication
- Assurances
- Affirmative Outreach
- Physical and Programmatic Accessibility
- Data and Information Collection Maintenance
- Monitoring
- Complaint Processing

IV. Creating a Smooth Transition

In order to maintain compliance with federal regulation and DWD policy, it is important for the new local EO officer to make certain updates and review schedules in a timely manner. In accordance with **29 CFR Part 38**

- a. Updating local EO Officer name and contact information on all relevant materials/locations
- b. Develop training plan for staff
- c. Determine local EO monitoring schedule

V. Additional Resources

In addition to all of these resources, there are a few additional locations that often contain relevant trainings and information relating to equal opportunity and nondiscrimination. The National Center on Leadership for the Employment and Economic Advancement of People with Disabilities, known as the LEAD Center, focuses on employment and economic advancement to promote individual and systems level change for all people with disabilities. "The LEAD Center provides policy research and recommendations, training and technical assistance as well as demonstration projects designed to break down silos in existing systems, processes and practices, and foster wider understanding, adoption and integration of next-generation employment practices in both the public and private sector."¹

WorkforceGPS, sponsored by the U.S. Department of Labor's Employment and Training Administration (ETA), "is an interactive online communication and learning technical assistance (TA) platform that was designed to communicate with and build the capacity of the

¹ <http://www.leadcenter.org/>

public workforce investment system to develop and implement innovative approaches to workforce and economic development in the 21st Century economy.”²

² <https://www.workforcegps.org/>

2022 1st Quarterly Conference Call Agenda Minutes – May 18, 2022

Time: 9:00AM to 9:30AM

Conference Call Number: MS Meetings/Conference Call Number

○ **Welcome/Regional Roll Call**

1	2	3	4	5	6	7	8	9	10	11	12
Nora	Melissa	Erica	Mellisa	Cindy	Jessica	Nikkie	Rob	Amanda	Cindy	Linda	Kevin
✓	✓	✓	Ops Mtg	✓	✓	✓	Ops Mtg	✓	✓	✓	✓

Monitoring Tips – Practical tips & how we approach and document - **The focus of the on-site review** is to determine compliance with equal opportunity and nondiscrimination requirements. The following are areas of emphasis during the on-site reviews with WorkOne offices:

Management and staff interviews - Meet with staff to make sure they are aware of EO requirements, EO policies and procedures. What EO types of training have they participated? Who is their regional EO officer?

Physical aspects of the site — Review ADA surveys to update as needed yearly - programmatic and architectural accessibility. Does the staff know how to request a reasonable accommodation/modification for the customer? Maybe there is technical assistance needed.

Assurance Language - Request for Proposals (RFPs), contracts, MOUS, OJT, work experience include assurances language. Review yearly including any new ones.

Notices and Communications - Display mandatory WIOA "Equal Opportunity is the Law" posters, and posters and signs for clients with limited English-speaking abilities – Make sure RESEA and other group sessions include the signage in the room or provide with packets. Make sure you check for the EO Tagline on all existing and new marketing materials in the lobby or what may be used in flyers and make sure to include in all social media (Facebook, Instagram, LinkedIn, Twitter)

Affirmative Outreach – LEP Advertisement of programs in different language. Babel Notice – ask staff (particularly front desk staff) where the Babel notice is located and what it is used for – Interpreting services contracts (who do they see if one is needed to be scheduled). Also, any meetings that have occurred with community agencies/providers/speakers – keep record of agencies and include any that are services for any protected groups (LEP agencies for example)

Complaint Procedures – Does staff know - Discrimination vs. Program Complaints. Ask what they would do if they had a discrimination against someone or the program based on the protected groups (*Section 188 prohibits discrimination on the basis of race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title I- financially assisted program or activity*)

And finally, documentation is key – if it is not written down or documented, it didn't happen – make sure all tools are complete with names/dates/notes – need more than a checklist on monitoring tools

A monitoring report at the end should be a written report to the attention of the entity that you are monitoring (include findings or AOC and resolution). For example, training needed on how to properly document confidential case notes. Or EO training in a particular area needed and then date it will be scheduled.

From the regs:

- Monitoring falls under the responsibilities of all local EO officers under 29 CFR 38.31 (b)
- Monitoring must include recipients and entities that receive WIOA Title 1 funds
- Monitoring to make sure those recipients and entities are not violating nondiscrimination and EO obligations under Section 188, and it includes monitoring the collection of data.

PY2021-22 EO Monitoring Updates -

- Make sure staff are familiar with Microsoft tools – especially if the office does not have an accessibility station <https://www.microsoft.com/en-us/accessibility?rtc=1> – Under resources there is some toolkits and videos
- Next program year monitoring – will be asking for regional data analysis
 - If you need technical assistance in this area, you can contact Jennifer Greimann at jgreimann@dwd.in.gov
- Get with WorkOne staff about knowing where they can locate and reference their regional EO policy. Some staff interviews would show us the “EO is the Law posters” as their policy.



Equal Opportunity Committee DRAFT Call Notes August 5, 2021 Virtual Meeting

ATTENDANCE

VICE CHAIR: Michael Harrington (VT)

MEMBERS: Kerry Bernard (AZ), Lynn Nedella (AZ), Matilda Aidam (CA), Ron Arthur (CO), Lauren Scott (DC), Wanda Holifield (DE), Amy Hohnstein (ID), Doug Werth (ID), Jaimee Bullock (IA), Jennifer Greimann (IN), John Ybarra (KS), Ireyan J. Clark-Sam (LA), Andrea Morrison (LA), Dennis Johnson (MA), Karen Lilledahl (MN), Heather Stein (MN), Christina Rusk (MO), Danielle Smith (MO), Randy Langley (MS), Joe Rangitsch (MT), Angela.Hansen-Kruse (NE), Michael Baltz (NV), Shanna Bagner (OH), Teresa Rainey (OR), Sandy List (PA), Amy Sunnergren (PA), Cheryl Burrell (RI), Tudy Newsom (SC), Derek Gustafson (SD), Fred Gaston (TN), Connie Zubeldia (TX), Kevin Bolander (UT), Tracy Callwood (USVI), Stedman Hodge, Jr (USVI), Rose Lucenti (VT), Kelly Moore (WA), Susana Vazquez Garcia (WI), Nicholas Allen (WV), Liz Gagen (WY).

USDOL STAFF: Naomi Barry-Perez, Denise Sudell, Lee Perselay

NASWA STAFF: Julie Squire, Hillary Hewko

WELCOME AND INTRODUCTIONS

Vice-Chair Michael Harrington (VT) welcomed members to the virtual meeting of the NASWA Equal Opportunity Committee.

PRESENTATIONS

USDOL Civil Rights Center (CRC) Update and Discussion

Naomi Barry-Perez, Director, Civil Rights Center, USDOL

USDOL Staff: Denise Sudell and Lee Perselay

CivilRightsCenter@dol.gov

Federal Office Update

- **Possible Guidance on Return to Work:** In response to COVID, the CRC may release guidance related to reasonable accommodation and disclosure of medical information.
- **[Executive Order on Advancing Racial Equity and Support for Underserved Communities through the Federal Government](#):** The Executive Order requires USDOL to provide a status report to the White House. The CRC said was not sure the report would be made public.
- **[New Executive Order on Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce](#).** Naomi encouraged members to review the Executive Order. She mentioned two initiatives that USDOL was focused on: expanding employment opportunities for formerly incarcerated individuals and facilitating of bystander intervention training.

- **WIOA Sec 188 Regulations Update.** USDOL intends to amend the [WIOA Sec 188](#) regulations to reflect the Supreme Court ruling on [Bostock v. Clayton County](#). The NPRM will be issued February 2022.

Member Q&A

- Q1.** What triggers the requirement to translate documents for participants?
- a. Is it exclusively that the participant states that his/her preferred language is other than English, or is it that the participant's preferred language is other than English and the participant is not proficient in English?
 - b. WDB EO's are asking this because if the participant responds with their preferred language, and they also state they are proficient in English (read, write, and speak), WDBs want to provide information to participants in English.

A1. Denise Sudell responded that the law requires recipients (WDBs) to identify and provide language assistance to LEP individuals. If the individual is not considered LEP for the purposes of reading and writing, then the recipient is not required to translate vital information into the preferred language. Denise reminded members that any communication with vital information must include a babel notice.

Other topics discussed:

- **Opening status of American Job Centers.** Julie Squire shared data compiled by NASWA as of August 5, 2021: 26 states/territories were open to walk in traffic, 19 states required appointments, and 8 states were closed to the public. Naomi encouraged members to send questions related to providing accommodations in AJCs to the Civil Rights Center.
- **Training topics for December in-person meeting.** The Policy & Promising Practices Subcommittee will provide the Civil Rights Center with a list of training topics for the December meeting.

COMMITTEE BUSINESS

Approval of Minutes. Vice-Chair Michael Harrington asked for a motion to approve the minutes from June. Dennis Johnson (MA) moved to approve; Rose Lucenti (VT) seconded the motion. The minutes were approved.

Subcommittee and Workgroup Updates

Communications Subcommittee. - Ron Arthur (CO)

The Communication Subcommittee's met in July to discuss the following projects and goals for the year:

- Create and distribute a SharePoint How-To Guide.
- Continue to work to facilitate communication with the CRC.

- The Subcommittee encourages members to specify regulations when submitting questions. This will help the CRC better address inquiries.
- The SharePoint site will have a new section that lists the questions & answers provided during EO meeting Q&A sessions with the CRC.
- Promote the use of the SharePoint discussion board for members to stay connected.

Policy & Promising Practices Subcommittee - Dennis Johnson (MA)

The Policy & Promising Practices Subcommittee's goals for the year:

- Coordinate and plan promising practice presentations for the upcoming meetings and calls.
- Plan and facilitate a webinar session for New EO Officers. The webinar will be recorded and available as a resource for new members on the SharePoint site.

Complaint Procedure Workgroup - Kevin Bolander (UT)

The Complaint Procedure Workgroup met in August to plan for the development of model complaint procedures policies and templates.

- The Workgroup asked members to send copies of their state complaint procedure policy and templates to NASWA.
- The Workgroup is also interested in reviewing CRC -state conciliation agreements related to complaint procedures.

Upcoming Meetings.

- **Virtual Meeting:** September
- **NASWA Summit:** December 8 – Austin, TX
 - The NASWA Summit will have a workshop focused on equal opportunity in workforce development programs. Members were asked to share state initiatives related to accessibility and inclusion in workforce programs. Members interested in presenting on the workshop panel were instructed to email Hillary Hewko at hhewko@naswa.org and/or Julie Squire at jsquire@naswa.org.
- **NASWA EO Committee Meeting:** December 9-10 – Austin, TX

Members can register and make hotel recommendation for the December meetings through the NASWA website.

PROMISING PRACTICES: PENNSYLVANIA

Amy Sunnergren (PA) shared Pennsylvania Department of Labor & Industry's promising practice to encourage training at local workforce development boards and local workforce development areas.

The presentation included an overview of:

- **29 CFR 38.31 requirements:**
 - “ Equal Opportunity Officer responsibilities:
 - (e) Conducting outreach and education about equal opportunity and nondiscrimination requirements consistent with §38.40 and how an individual may file a complaint consistent with §38.69;
 - (f) Undergoing training (at the recipient's expense) to maintain competency of the EO Officer and staff, as required by the Director;”
- **PA Current Training and Notices:** Annual Technical Assistance with Equal Opportunity Training, Email Notice of Free Trainings, and Newsletter.
- **PA Training Requirements.** An annual training plan must be submitted with at least one monthly training by an EO officer or other qualified party, adjustable as needed.
- **PA Strategies to Monitor Training:** Proposed training and training logs are required to be submitted on an annual basis.

The PowerPoint presentation and copies of the training log and newsletters are available on the NASWA Website.

STATE ROUNDTABLE

Topics discussed: ADA accessibility audits, AJC opening status, complaint trends, and language assistance.

ADJOURN

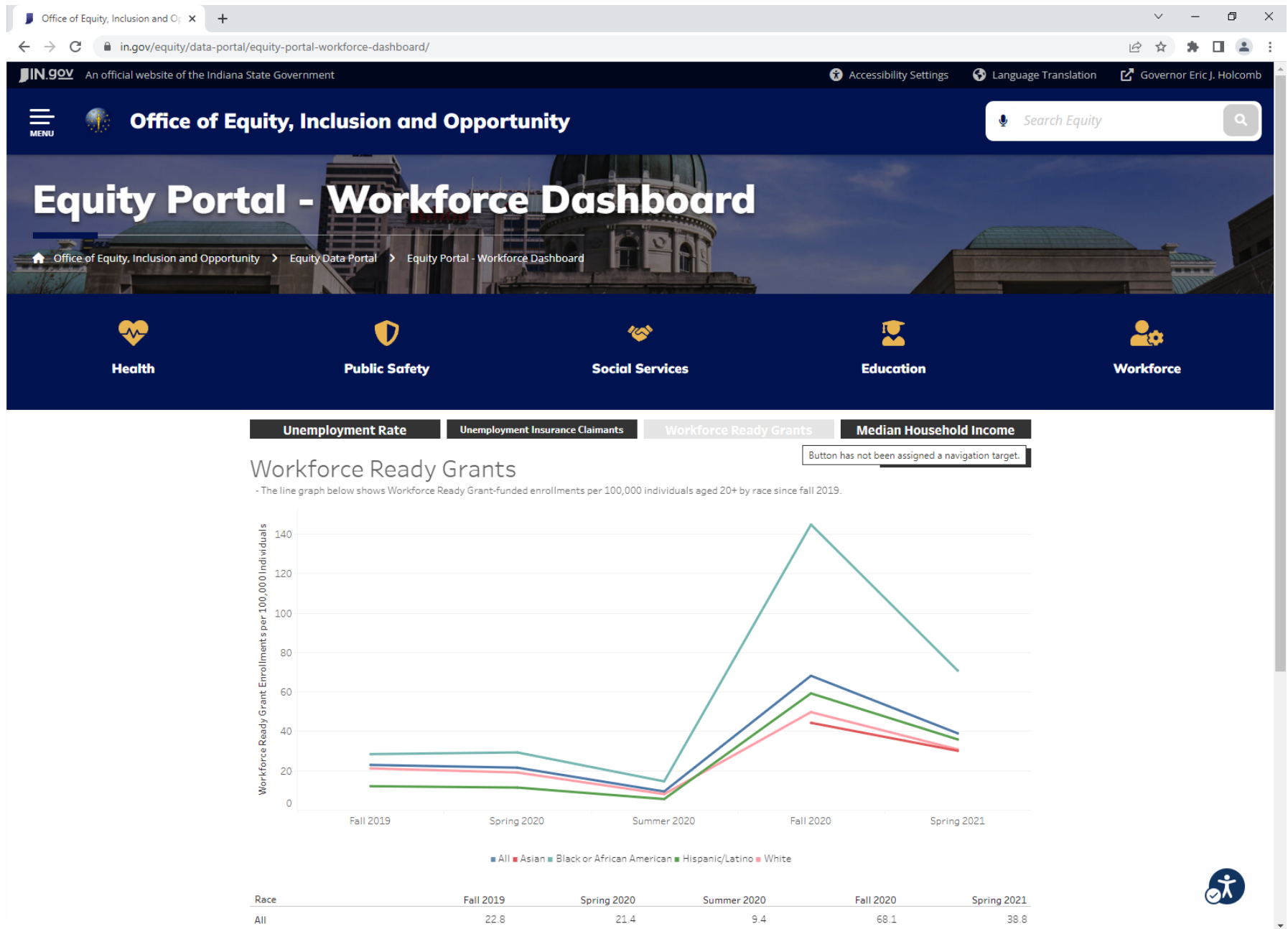
The William J. Harris Award honors a State or partnership involving a State for an innovative workforce related program, project, or initiative which results in significant contributions towards the achievement of equal opportunity and nondiscrimination.

Chair: Jennifer Long (IN) ---9 members

Members: Harvey Andrews (IA), Terri Bonner (PA), Shirley Bray-Sledge (VA), Rhesha Lewis-Plummer (DC), Tonya Powell (AL), Evella Quiett (LA), Danielle Smith (MO), Elizabeth Warner (GA), and Matt Weldon (RI).

There are three Criteria:

- **Innovative Program Design:** clearly defining ways to include individuals in protected groups; monitoring techniques to ensure equality within programs; and achieving successful outcomes for protected groups;
- **Broad Scope and High Impact** of the program on internal and external customers, as well as on local, regional, statewide, or national stakeholders, exhibiting best practices that can be replicated; and
- **EO Strategies that advance Continuous Improvement (Enhancement)** and show documented steps in planning, execution, and review and evaluation process/methods.



Element 2: Notice and Communication

[29 CFR 38.34 through 38.39]

WIOA Title I recipients, including one-stop partners (OSPs)²² to the extent they participate in the one-stop delivery system, must provide initial and continuing notice that they do not discriminate on any prohibited basis. This notice must be provided to registrants, applicants and eligible registrants/applicants, participants, applicants for employment and employees, unions or professional organizations that hold collective bargaining or professional agreements with the recipient, sub-recipients that receive WIOA Title I funds from the recipient, and members of the public, including those with impaired vision or hearing and those with limited English proficiency.²³

EO Notice Requirements

Recipients were advised of the posting and dissemination requirements of the “Equal Opportunity is the Law” notice (the EO Notice)²⁴ as well as the requirement that appropriate steps are taken to ensure communications with individuals with disabilities are as effective as communications with others, and that the notice is provided in appropriate languages to ensure meaningful access for limited English proficient (LEP) individuals via DWD Policy 2016-09 (DWD EO Policy).²⁵

The DWD EO Policy introduced updated law and regulations under Section 188 and provided a 90-day deadline from the effective date of the final regulations for Local EO Officers to replace existing EO Notices. All EO Notices were to be updated and posted and are verified during annual EO Monitoring site visits.

The acknowledgment of EO Notice appears in the DWD Case Management System, Indiana Career Connect (ICC) when the applicant reaches the final page of the WIOA application.²⁶ The case manager prints out the completed application and provides the applicant with a copy of the EO Notice, which is acknowledged by their signature on the final page. If a user is registering for online services through the ICC website, upon selecting to register as an individual, they are immediately directed to the EO Notice that requires their acknowledgment to proceed.²⁷

²² OSPs, as defined in WIOA 121(b), are considered recipients for purposes of 29 CFR 38.

²³ 29 CFR 38.34

²⁴ Documentation 2.1: EO is the Law Notice

²⁵ DWD Policy 2016-09 (see Documentation 1.5)

²⁶ Documentation 2.2: WIOA Application EO Acknowledgment

²⁷ Documentation 2.3: ICC Registration EO Acknowledgment

Publications, Broadcasts, and Other Communications

All recipients must include an EO Tagline in recruitment brochures, pamphlets, and other publications which promote WIOA programs and activities. While the DWD EO Policy follows Section 188, it also gives flexibility for recipients to tailor the EO Tagline dependent on subject matter of the program or materials they are publishing. All recipients must include two required clauses: that the program or activity in question is an "equal opportunity employer/program" and that "auxiliary aids and services are available upon request to individuals with disabilities." Tagline compliance is checked during annual Compliance and Policy Workforce Division/EO Monitoring visits, with corrective action required as needed. The EO Tagline and a link to the EO Notice is listed at the bottom of every page on DWD's website.

When a phone number is provided, it must be accompanied by the telephone number of the text telephone (TTY) or equally effective communication system, such as a relay service,²⁸ videophone, or captioned telephone used by the recipient.

An informal tip sheet was created for internal use with DWD Marketing/Communications which was shared with the LWDA communications directors as "Equal Opportunity Guidelines" providing more specific guidance on appropriate EO Tagline use.²⁹

Information in Languages Other than English

According to the most recent data available, Spanish is the predominant non-English language spoken by LEP individuals in Indiana.³⁰ In light of this finding, the "Equal Opportunity is the Law" notice is available in both English and Spanish, and copies of the EO Notice in both languages are typically posted in all WorkOne offices. Copies of the EO Notice and additional state and federal posters, such as the Unemployment Insurance and Migrant and Seasonal Agricultural Worker Protection, are provided in English and Spanish on DWD's website.³¹ **Additionally, the State EO Officer has provided to all LWDA's the guide to using the accessibility workstation in Spanish for them to put in all the WorkOne offices with accessibility workstations.**

LEP individuals can translate the information provided on the ICC website from English to their native language using a built-in function. Additional LEP services are provided at the regional level. Examples include, but are not limited to, bilingual staff, hand-held translators, English as a Second Language classes, Google Translate, and specialized software such as Rosetta Stone. Sample LEP documents in Spanish and other languages can be found on the State's Equal Opportunity webpage.³²

²⁸ Relay Indiana, Indiana's statewide Relay Service, is more fully discussed in Element 5.

²⁹ Documentation 2.4: Equal Opportunity Guidelines

³⁰ Documentation 2.5: Excerpt of Indiana Census Data on Languages Spoken

³¹ State and Federal posters in Spanish: <https://www.in.gov/dwd/2455.htm>

³² Sample LEP Documents: <https://www.in.gov/dwd/3192.htm>

In accordance with regulation prohibiting discrimination against LEP individuals as a form of national origin discrimination,³³ Google Translate was added to ICC in the Fall of 2019 in order to translate words from English into other languages. All regional leadership and AJC staff were notified and trained on how it works in the system. Babel notices are also available for all communication of vital information. Vital information includes information, whether written, oral or electronic, that is necessary for an individual to obtain, or understand how to obtain, any aid, benefit, service, and/or training.³⁴ Babel notices indicate in appropriate languages that language assistance is available³⁵ and are given with vital information such as consent and complaint forms, notices of rights and responsibilities, and communications posted on websites. DWD provides Babel notice samples³⁶ based on the CRC's Babel notice and the demographics of Indiana³⁷. In October 2019, Babel notices were uploaded into ICC and can be accessed when the EO Notice is displayed³⁸. Additionally, LWDAs have the notices in various prominent locations throughout the WorkOnes. **DWD's Unemployment Insurance (UI) program is in the process of adding Babel notices to all claimant monetary determinations, determinations of eligibility, and appeals documents. On May 2, 2022 Indiana received \$6.7 million for the UI Equity Grant from USDOL. One of the focus areas for this grant will be partnering with an expert in the fields of interpretation, translation, and plain language services to review communication methods, existing documentation sent to claimants and employers, and process flows for communicating with interested parties.**

To fully meet the needs of LEP persons in Indiana, DWD also provides telephonic³⁹ and in-person interpreter services⁴⁰ at no charge to the client. A contract establishes 24 hour/7 day a week telephonic interpretive services, billed by the minute and based on the language selected. **Similarly, several contracts establish hourly rates for face-to face interpretive services, based on the language selected for different service areas throughout Indiana. DWD's website highlights interpretation services on its website for different services, like UI.**⁴¹

On January 3, 2019, questions regarding LEP and preferred language were added to ICC.⁴² LWDAs are encouraged to access this data in order to better serve individuals that are LEP by knowing what preferred languages are prevalent in their local area. This includes providing notice and documentation in those languages.

³³ 29 CFR 38.9

³⁴ 29 CFR 38.4(ttt)

³⁵ Documentation 2.6: Excerpt from Local EO Officer NDP Training Element 2 PowerPoint

³⁶ Documentation 2.7: Babel Notice for Vital Documents

³⁷ See Indiana Census Data on Languages Spoken

³⁸ Documentation 2.8 Babel Notice Display in ICC

³⁹ Documentation 2.9: Telephonic Interpretation Services Contract

⁴⁰ Documentation 2.10: In-Person Interpretation Services Contracts

⁴¹ **Documentation 2.11: DWD Contact Us Webpage**

⁴² Documentation 2.12: Preferred Language Questions in ICC

As recommended in the regulations,⁴³ DWD is in the final stages of developing a resource document providing guidance for creating a LEP Plan, a written language access plan which ensures that LEP individuals have meaningful access to WIOA Title I-financially assisted programs and activities. This guidance applies to the programs and activities that are part of the One-Stop delivery system, Indiana's WorkOne/American Job Centers (WorkOne/AJC). DWD encourages each LWDA to create an LEP Plan (Plan). Local Plans must follow the guidelines in 29 CFR 38.

Orientation and Nondiscrimination Efforts

During any orientation session, in-person or remote, DWD and OSPs include a discussion of rights under the nondiscrimination and EO provisions of WIOA. DWD and the local WorkOne offices distribute the EO Notice to registrants, applicants, eligible registrants/applicants, applicants for employment, employees, and interested members of the public to ensure that individuals have been notified of their rights under Section 188.⁴⁴

⁴³ 29 CFR 38.9; Appendix to 38.9

⁴⁴ Documentation 2.13: Rapid Response Orientation Presentation Excerpt

Element 2 Documentation

Documentation 2.1: EO is the Law Notice

Documentation 2.2.: WIOA Application EO Acknowledgment

Documentation 2.3: ICC Registration EO Acknowledgment

Documentation 2.4: Equal Opportunity Guidelines

Documentation 2.5: Excerpt of Indiana Census Data on Languages Spoken

Documentation 2.6: Excerpt from Local EO Officer NDP Training Element 2 PowerPoint

Documentation 2.7: Babel Notice for Vital Documents

Documentation 2.8: Babel Notice Display in ICC

Documentation 2.9: Telephonic Interpretation Services Contract

Documentation 2.10: In-Person Interpretation Services Contracts

Documentation 2.11: DWD Contact Us Webpage

Documentation 2.12: Preferred Language Questions in ICC

Documentation 2.13: Rapid Response Orientation Presentation Excerpt

EQUAL OPPORTUNITY IS THE LAW

It is against the law for this recipient of Federal financial assistance to discriminate on the following bases: against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I—financially assisted program or activity.

The recipient must not discriminate in any of the following areas: deciding who will be admitted, or have access, to any WIOA Title I—financially assisted program or activity; providing opportunities in, or treating any person with regard to, such a program or activity; or making employment decisions in the administration of, or in connection with, such a program or activity.

Recipients of federal financial assistance must take reasonable steps to ensure that communications with individuals with disabilities are as effective as communications with others. This means that, upon request and at no cost to the individual, recipients are required to provide appropriate auxiliary aids and services to qualified individuals with disabilities.

WHAT TO DO IF YOU BELIEVE YOU HAVE EXPERIENCED DISCRIMINATION

If you think that you have been subjected to discrimination under a WIOA Title I—financially assisted program or activity, you may file a complaint within 180 days from the date of the alleged violation with either: the recipient's Equal Opportunity Officer (or the person whom the recipient has designated for this purpose);

or

Director, Civil Rights Center (CRC), U.S. Department of Labor
200 Constitution Avenue NW, Room N-4123, Washington, DC 20210
 or electronically as directed on the CRC website at www.dol.gov/crc.

If you file your complaint with the recipient, you must wait either until the recipient issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center (see address above). If the recipient does not give you a written Notice of Final Action within 90 days of the day on which you filed your complaint, you may file a complaint with CRC before receiving that Notice. However, you must file your CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which you filed your complaint with the recipient). If the recipient does give you a written Notice of Final Action on your complaint, but you are dissatisfied with the decision or resolution, you may file a complaint with CRC. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action.

EQUAL OPPORTUNITY IS THE LAW

It is against the law for agencies affiliated with this site to discriminate on the following basis:

- Against any individual in the United States, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief; and
- Against any beneficiary of programs financially assisted under Title I of the Workforce Innovation and Opportunity Act of 2014 (WIOA), on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his or her participation in any WIOA Title I-financially assisted program or activity.

Additionally, agencies affiliated with this site comply fully with the nondiscrimination and equal opportunity provisions of the following laws:

- Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the basis of race, color, and national origin;
- Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;
- The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age; and
- Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs.

WHAT TO DO IF YOU BELIEVE YOU HAVE EXPERIENCED DISCRIMINATION

If you think that you have been subjected to discrimination, you may file a complaint within 180 days from the date of the alleged violation with either the agency's Equal Opportunity Officer (or the person whom the agency has designated for this purpose); or The Director, Civil Rights Center (CRC), U.S. Department of Labor, 200 Constitution Avenue NW, Room N-4123, Washington, DC 20210.

For more information on filing a discrimination claim, visit the [Equal Employment Opportunity Commission website](#).

The U.S. Department of Labor oversees discrimination and equal opportunity enforcement through its [Civil Rights Center](#).

Auxiliary aids and services are available upon request to individuals with disabilities.

Applicant Signature

Date

Indiana Career Connect - X

Secure | https://www.indianacareerconnect.com/vosnet/loginintro.aspx?bInStartHere=True&plang=E

If you have not previously registered, please click one of the links under **Create a User Account** to create a new User ID. To view Indiana Career Connect with limited access, click the **Guest Access** link.

For help click the question mark icon next to each section.

Option 1 - Already Registered

User Name

Username

Password

Sign In

If you have forgotten your user name and/or password, please click [Retrieve User Name or Password](#).

Option 2 - Try Us Out

If you would like to view Indiana Career Connect as a visitor to see what services are available, please click [Guest Access](#).

☒ English ☐ Español

Option 3 - Create a User Account

If you would like to become a fully registered user with Indiana Career Connect and have access to all of our online services, select one of the following account types. If you are not sure if you need to register on the system, learn more about the benefits of registering on page: [Why Register?](#)

[Individual](#) - Register as this account type if you are an individual and wish to search for the latest job openings, post a résumé online, find career guidance, search for training and education programs, find information on local employers, etc.

[Employer](#) - If you are looking for industry information, labor market information, job applicants for your business, or want to post job openings online.

Return to Previous Page

Indiana Career Connect - X

Secure | https://www.indianacareerconnect.com/vosnet/Privacy/RegistrationAgreement.aspx?t=ind&action=&plang=E

ICC now requires all Employer, Agent and Individual users to change their username to a verified email address. Please email ICC@dwd.in.gov if you have any issues changing your account information. Passwords may be changed or kept the same. Please see the 'News and Announcements' section titled "ALL USERS PLEASE READ: Verified Email Address & Self Service Password Reset Change on 11/30/2017" on the ICC log on page link for guides on how to use these new features.

[Home](#) [Register or Sign In](#) [Services for Individuals](#) [Services for Employers](#)

INDIANACAREERCONNECT

Equal Opportunity and Non-Discrimination Notice.

Equal Opportunity Is the Law

It is against the law for this recipient of Federal financial assistance to discriminate on the following bases: Against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I financially assisted program or activity.

The recipient must not discriminate in any of the following areas: Deciding who will be admitted, or have access to any WIOA Title I financially assisted program or

By clicking the *I agree* button below and continuing with the registration process, you acknowledge that you have reviewed and understand the information contained in the **Equal Opportunity Is the Law** notice above.

I agree

I disagree

Privacy Statement | Disclaimer | Terms of Use | Accessibility | Recommended Settings | EEO | Protect Yourself | About this Site | Contact Us

Copyright © 1998-2018 Geographic Solutions, Inc. All rights reserved.
For more information contact [Geographic Solutions](#).

063

Equal Opportunity Guidelines

Background

New regulations were finalized/released in early 2017. EO Officers for the state and regions are still in the process of understanding and implementing these new requirements. However, each region has a designated Local EO Officer who should be aware of these requirements.

Tag Line

While the state policy follows the federal regulations it also gives flexibility to tailor their tag line dependent on subject matter of the program or materials they are publishing. There are two required clauses that must be incorporated into the tag line:

1. The EO Tagline must include language that the program or activity in question is an “equal opportunity employer/program”
2. “Auxiliary aids and services are available upon request to individuals with disabilities.”

Additional language/specifics of the tagline can vary as long as those 2 specific clauses are included.

If a voice telephone number is included, then a TTY or equally effective telecommunications system (e.g., relay service, videophone, captioned telephone, etc.) must also be included. DWD’s TTY line is 1-800-743-3333.

When is this to be used?

Per 29 CFR Part 38, this tagline must appear in basically all outward facing/external communications. Specifically, the Regulations say “in recruitment brochures and other materials that are ordinarily distributed or communicated in written and/or oral form, electronically and/or on paper, to staff, clients, or the public at large, to describe programs financially assisted under Title I of WIOA or the requirements for participation by recipients or participants.” This also includes program info published or broadcast in the news media.

Language Requirements

As for languages – the Regulations require that “reasonable steps” be taken to ensure “meaningful access” to limited English proficient (LEP) individuals via EVERY delivery method (written, electronic, and in person). Interpretation/translation services must be available free of charge. For languages spoken by a “significant amount of the eligible population to be served, or likely to be encountered, then all “vital information” in written materials MUST be translated and readily available in hard copy, upon request, or electronically (e.g. websites).

- “Significant population” isn’t clearly defined in the Regulations – states/local areas have discretion to determine this...
- “Vital information” means info that is necessary for an individual to understand how to obtain any aid, benefit, service, and/or training (e.g., applications, consent and complaint forms, and notices of rights and responsibilities.)
 So, unless it’s “vital information” – there isn’t necessarily a requirement to have it readily translated and on hand.

Again, each Region has a designated Local EO Officer who should be fully aware of these requirements. If you do not know who your Local EO Officer is contact Jennifer Long at JLong@DWD.in.gov or 317.234.8400.

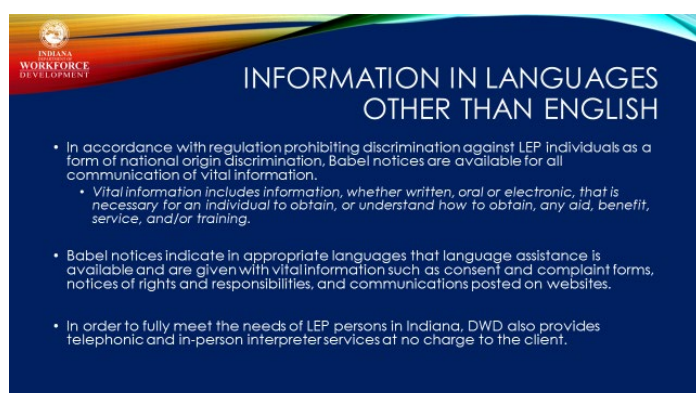
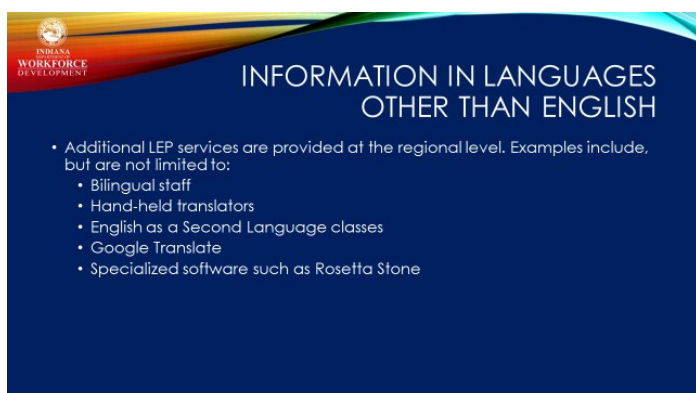
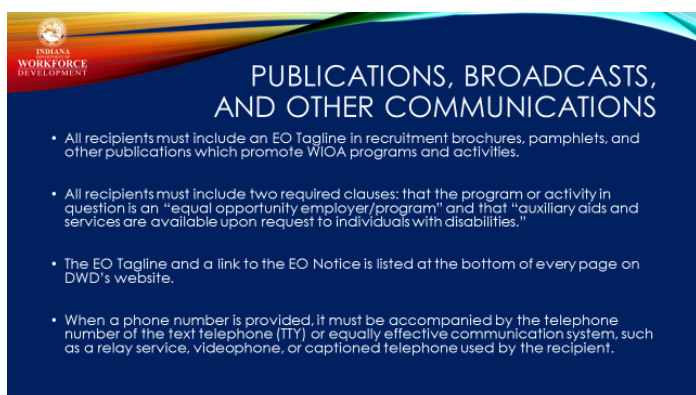
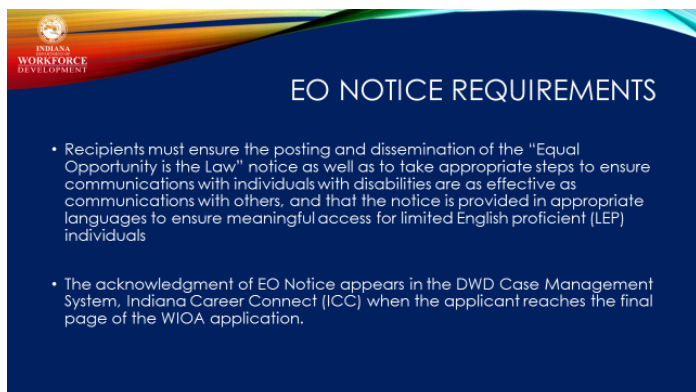
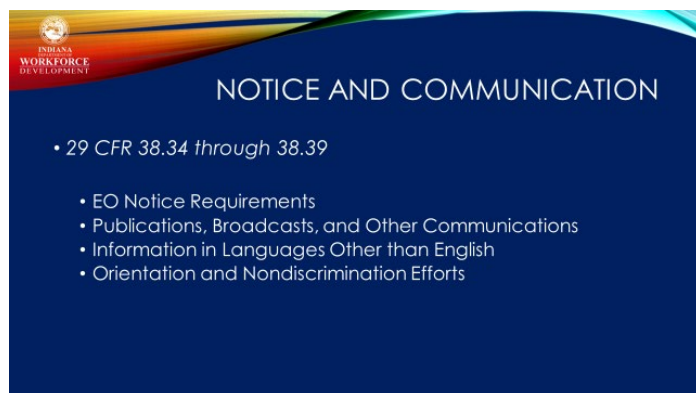
 An official website of the United States government Here's how you know

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER



Note: This is a modified view of the original table produced by the U.S. Census Bureau.
This download or printed version may have missing information from the original table.

Indiana	
Label	Estimate
▼ Total:	6,278,766
Speak only English	5,728,258
> Spanish:	290,345
> French (incl. Cajun):	11,600
> Haitian:	1,897
> Italian:	2,532
> Portuguese:	2,746
> German:	30,330
> Yiddish, Pennsylvania Dutch or other West Germanic languages:	30,437
> Greek:	3,673
> Russian:	4,324
> Polish:	3,935
> Serbo-Croatian:	4,316
> Ukrainian or other Slavic languages:	4,489
> Armenian:	189
> Persian (incl. Farsi, Dari):	1,884
> Gujarati:	3,813
> Hindi:	8,960
> Urdu:	3,568
> Punjabi:	7,076
> Bengali:	1,816
> Nepali, Marathi, or other Indic languages:	3,029
> Other Indo-European languages:	4,178
> Telugu:	4,491
> Tamil:	4,642
> Malayalam, Kannada, or other Dravidian languages:	1,693



ORIENTATION AND NONDISCRIMINATION EFFORTS

- During any orientation session, in-person or remote, DWD and One-Stop Partners must include a discussion of rights under the nondiscrimination and EO provisions of WIOA.
- DWD and the local WorkOne offices must distribute the EO Notice to registrants, applicants, eligible registrants/applicants, applicants for employment, employees, and interested members of the public to ensure that individuals have been notified of their rights under Section 188.34

NDP Element 2 Quiz

<https://www.surveymonkey.com/r/72855FD>

**Babel Notice from DWD EO Unit for
Vital Documents, Notices
Forms or Applications, Assessments & Training Material**

29 CFR 38.9(g)(3): *“Recipients must include a “Babel notice,” indicating in appropriate languages that language assistance is available, in all communications of vital information, such as hard copy letters or decisions or those communications posted on websites.”*

A Babel notice is a short notice included in a document or electronic medium (e.g., website, “app,” email) in multiple languages informing the reader that the communication contains vital information, and explaining how to access language services to have the contents of the communication provided in other languages.

The DWD EO Officer procured additional translation that can be used electronically and on websites. It is being provided in 10 of the most common non-English languages spoken in the United States. As CRC advised, DWD has added an additional translation for Burmese. Also note that the Babel notice does not replace the obligations for recipients to provide individualized language services.

English

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

Spanish

!IMPORTANTE! Este documento o solicitud contiene información importante sobre sus derechos, responsabilidades y/o beneficios. Es fundamental que usted entienda la información contenida en este documento y/o solicitud, y le proporcionaremos la información en su idioma preferido sin costo alguno para usted. Póngase en contacto con su oficina local de Indiana WorkOne más cercana para obtener asistencia con la traducción y comprensión de la información en este documento y/o solicitud.

Chinese – Traditional

重要信息！ 本文档或应用程序包含有关您的权限、责任和/或利益的**重要信息**。请务必理解本文档和/或应用程序中的这些信息，而我们将免费为您提供所需语言版本的这些信息。有关本文档和/或应用程序中的信息翻译和理解的事宜，请您向当地最近的印第安纳州 WorkOne 办事处寻求帮助。

Vietnamese

QUAN TRỌNG! Tài liệu hoặc đơn yêu cầu này chứa **thông tin quan trọng** về các quyền, trách nhiệm và/hoặc lợi ích của bạn. Việc bạn hiểu rõ thông tin trong tài liệu và/hoặc đơn yêu cầu này rất quan trọng, và chúng tôi sẽ cung cấp thông tin bằng ngôn ngữ bạn muốn mà không tính phí. Hãy liên hệ với Văn phòng WorkOne Indiana gần vị trí của bạn để được hỗ trợ về dịch thuật và hiểu rõ thông tin trong tài liệu và/hoặc đơn yêu cầu này.

Tagalog

MAHALAGA! Ang dokumentong ito o aplikasyon ay naglalaman ng **mahalagang impormasyon** tungkol sa iyong mga karapatan, pananagutan at/o benipisyo. Napakahalaga na nauunawaan mo ang impormasyong nasa dokumentong ito at/o aplikasyon, at ilalaan namin ang impormasyon ayon sa gusto mong wika nang wala kang babayaran. Mangyaring makipag-ugnayan sa inyong lokal na Opisina ng Indiana WorkOne na malapit sa inyong lugar para matulungan sa pagsasalin at pag-unawa sa impormasyong nasa dokumentong ito at/o aplikasyon.

French

IMPORTANT ! Ce document ou cette demande contient **des informations importantes** concernant vos droits, responsabilités et/ou avantages. Il est essentiel que vous compreniez les informations contenues dans ce document et/ou cette demande, que nous pouvons vous communiquer gratuitement dans la langue de votre choix. N'hésitez pas à contacter le bureau WorkOne Indiana proche de chez vous pour obtenir de l'aide concernant la traduction et la signification des informations contenues dans ce document et/ou cette demande.

Haitian Creole

AVI ENPÒTAN! Dokiman oubyen aplikasyon sa genyen **enfòmasyon ki enpòtan** konsènan dwa, responsablite, ak/oswa benefis ou yo. Li enpòtan ke ou konprann enfòmasyon ki nan dokiman ak/oubyen aplikasyon sa, e n ap bay enfòmasyon an nan lang ou prefere a, san ou pa peye anyen. Tanpri kontakte Biwo WorkOne Indiana ki toupre w la pou èd nan tradiksyon ak pou konprann enfòmasyon ki nan dokiman ak/oubyen aplikasyon sa.

Portuguese

IMPORTANTE! Este documento ou aplicativo contém **Informações importantes** sobre os seus direitos, responsabilidades e/ou benefícios. É importante que você compreenda as informações contidas neste documento e/ou aplicativo, e nós iremos fornecer as informações em seu idioma de preferência sem nenhum custo para você. Favor, entre em contato com o seu local Indiana WorkOne Office perto de você para obter a assistência na tradução, e compreensão das informações contidas neste documento e/ou aplicativo.

Arabic

ذلك من أي أو إعاداتك أو مسؤولياتك أو حقوقك عن **مهمة معلومات** على الطلب أو الوثيقة هذه تحتوي **مهم** ب هذه نزودك وسوف الطلب، أو/و الوثيقة هذه في المضمنة ماثلاً معلو تفهم أن ب مكان الأهمية ومن. معاً مكتب ب مدلي عليها تشتمل WorkOne أقرب الاتصال يرجى. عليك تكلفة أي دون المفضلة بلغتك الم معلومات يال الم معلومات تلك وفهم ترجمة في المساعدة على للحصول إنديانا ولاية في لديك الطلب أو/و الوثيقة هذه

Russian


ВАЖНО! В этом документе или заявлении содержится **важная информация** о ваших правах, обязанностях и/или льготах. Для нас очень важно, чтобы вы понимали приведенную в этом документе и/или заявлении информацию, и мы готовы бесплатно предоставить вам информацию на предпочитаемом вами языке. Обратитесь в ближайшее отделение Indiana WorkOne Office, где вам помогут с переводом и пониманием указанной в этом документе и/или заявлении информации.

Korean

중요! 이 문서 또는 신청서에는 귀하의 권리, 책임 및/또는 혜택에 대한 **중요 정보**가 포함되어 있습니다. 이 문서 및/또는 신청서의 정보를 반드시 이해해야 하며, 원하는 언어로 번역된 정보를 무료로 받으실 수 있습니다. 이 문서 및/또는 신청서 정보를 번역하고 이해하는 데 도움이 필요하시면 가까운 Indiana WorkOne Office에 문의하십시오.

Burmese

သတိပြုရန်။ ဤစာရွက်စာတမ်း သို့မဟုတ် လျှောက်လွှာတွင် သင့်ကိုယ်ပိုင် အခွင့်အရေးများ၊ တာဝန်များနှင့်/သို့မဟုတ် အကျိုးခံစားခွင့်များစသည့် **အရေးကြီးသည့် အချက်အလက်များ** ပါဝင်နေပါသည်။ ဤစာရွက်စာတမ်း နှင့်/သို့မဟုတ် လျှောက်လွှာပါ အချက်အလက်များအား သင်နားလည်ရန် အလွန်အရေးကြီးပြီး ကျွန်ုပ်တို့ဘက်မှ သင်လိုချင်သည့် ဘာသာစကားဖြင့် ဤအချက်အလက်များကို အခကြေးငွေ မယူဘဲ ပံ့ပိုးပေးသွားပါမည်။ ဤစာရွက်စာတမ်း နှင့်/သို့မဟုတ် လျှောက်လွှာပါ အချက်အလက်များကို ဘာသာပြန်ရန်နှင့် နားလည်နိုင်ရန် အကူအညီလိုပါက သင်နှင့် နီးစပ်ရာ ဒေသတွင်း Indiana WorkOne Office ကို ဆက်သွယ်ပေးပါ။



Equal Opportunity and Non-Discrimination Notice.

Equal Opportunity Is the Law

It is against the law for this recipient of Federal financial assistance to discriminate on the following bases: Against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I-financially assisted program or activity

By clicking the *I agree* button below and continuing with the registration process, you acknowledge that you have reviewed and understand the information contained in the **Equal Opportunity Is the Law** notice above.

I agree

I disagree

NEW LAYOUT



This would be a link with the globe symbol and the title "Alternative Languages" that causes the Babel Notice to pop up when clicked

Equal Opportunity and Non-Discrimination Notice.

Equal Opportunity Is the Law

It is against the law for this recipient of Federal financial assistance to discriminate on the following bases: Against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I-financially assisted program or activity

By clicking the *I agree* button below and continuing with the registration process, you acknowledge that you have reviewed and understand the information contained in the **Equal Opportunity Is the Law** notice above.

I agree

I disagree

NEW LAYOUT



Equal Opportuni

It is against the discriminate on the States, on the birth, and status, and gen proficiency), ag beneficiary of, under Title I of basis of the ind Title I-financial

By clicking the I agree button, you understand the information

English

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

Spanish

¡IMPORTANTE! Alguna de la información en esta página web contiene información importante sobre sus derechos, responsabilidades y/o beneficios. Es fundamental que usted entienda el material y le proporcionaremos la información en su idioma preferido sin costo alguno para usted. Póngase en contacto con una oficina local de WorkOne cerca de usted para obtener asistencia con la traducción y comprensión de la información en esta página web.

Chinese - Traditional

重要信息! 本网站中的部分内容包含有关您的权利、责任和/或利益的重要信息。请务必理解相关资料, 而我们将免费为您提供所需语言版本的这些信息。有关本网站中的信息翻译和理解事宜, 请向您当地最近的 WorkOne 办事处寻求帮助。

Vietnamese

QUAN TRỌNG! Một số thông tin trên trang web này chứa thông tin quan trọng về quyền, trách nhiệm và hoặc lợi ích của bạn. Việc bạn hiểu rõ tài liệu rất quan trọng, và chúng tôi sẽ cung cấp thông tin bằng ngôn ngữ bạn muốn mà không tính phí với bạn. Vui lòng liên hệ với Văn phòng WorkOne địa phương gần bạn để được hỗ trợ về dịch thuật và hiểu thông tin trên trang web này.

Tagalog

MAHALAGA! Ang ilang impormasyon sa web page na ito ay naglaaman ng mahalagang impormasyon tungkol sa inyong mga karapatan, panatagutan at/o benepisyo. Napakahalaga na nauunawaan mo ang materyal, at itaon namin ang impormasyon ngayon guano nang wika nang wala kang babayaran. Mangyuring makipag-ugnayan sa inyong lokal na opisina ng WorkOne na malapit sa inyong lugar para matulungan sa pagsalin at pag-unawa sa impormasyong nasa web page na ito.

When the link is clicked, the Babel notice should appear in a pop-up on the screen with a scroll bar to view the entire document.

There can be an "X" at the top to close it, or it can be set up to close however pop-ups normally are in ICC.

ce to
United
ncy,
gender
English
against any
assisted
n the
WIOA

ewed and

Quantity Purchase Agreement With The State Of Indiana

Vendor: PROPIO LS LLC
Remit to: 10801 MASTIN ST STE 580
OVERLAND PARK KS 66210

Name and Address of Vendor: PROPIO LS LLC
10801 MASTIN ST STE 580
OVERLAND PARK KS 66210

Qty Purchase Agreement QPA Number		Page
0000000000000000000050146		1 of 2
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/08/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000320968	
Vendor Telephone Nbr:		
Name Of Contact Pers:		
Contact Email:	ACCOUNTING@PROPIO-LS.COM	
FAX Number:		

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement.

The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date.

The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement.

Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.

Line Number	Quantity	UNIT	Article and Description	Unit Price
<p>This is a request to establish a Quantity Purchase Agreement for telephonic interpretive services. QPA can be mutually renewed yearly for two additional years under the same terms and conditions. Renewals subject to the approval of the Department of Administration and the State Budget Agency. Total term of this agreement including all renewals, shall not exceed four years.</p> <p>Services are available 24/7, with no additional charges for after-hours calls. Tips for Working with a Telephone Interpreter: 1. If you expect the call to last more than 30 minutes, tell the interpreter at the beginning. Interpreters accept scheduled assignments and adjust their on-demand call time accordingly. 2. Always speak in first person, just as you would in normal conversation. For example, say, "Do you have a fever?" rather than, "Ask her if she has a fever." 3. When using a speakerphone, make sure all parties speak clearly and loud enough to allow the interpreter to accurately provide service. Be close to the speakerphone when talking. 4. After speaking a few sentences, pause to give interpreter time to interpret. 5. If several people are on the conference call, manage the discussion. Discourage side-conversations that the interpreter will not hear. 6. Please note that static and poor audio connections can be caused by any party on the line. If audio interference makes it difficult to communicate, have all parties hang up and reinitiate the call. If this approach fails, call Propio's customer service at 1-888-528-6692, option 0, and ask for assistance.</p> <p>Instructions for using this contract: - Dial the unique 800 number provided to your agency and/or division. - Press 1 for Spanish or 2 for all other languages. - If non-Spanish, enter the appropriate two-digit language code found on card provided by vendor. - Enter four-digit account number found on the card provided by the vendor. Authorized users may be asked intake questions as requested by their agencies. For billing or account questions, or to establish an account with this vendor, please contact Windy Taylor, wtaylor@propio-ls.com, (913) 396-6045, ext. 1015. The contract manager for this QPA is Jacob Pardue, who can be contacted at jpardue1@idoa.in.gov for all other questions.</p>				
2	99,999,999.00 EA	000000000100376823	Telephonic Interpreter, Spanish per min.	0.4700
3	99,999,999.00 EA	000000000100376824	Telephonic Interpreter, Burmese per min.	0.6500
4	99,999,999.00 EA	000000000100376825	Telephonic Interpreter, Chin per min.	0.6500
5	99,999,999.00 EA	000000000100376826	Telephonic Interpreter, Arabic per min.	0.6500
6	99,999,999.00 EA	000000000100376827	Telephonic Interpreter, French per min.	0.6500
7	99,999,999.00 EA	000000000100376828	Telephonic Interpreter, Karen per min.	0.6500
8	99,999,999.00 EA	000000000100376829	Telephonic Interpreter, Vietnamese per min.	0.6500
9	99,999,999.00 EA	000000000100376830	Telephonic Interpreter, Swahili per min.	0.6500
10	99,999,999.00 EA	000000000100376831	Telephonic Interpreter, Mandarin per min.	0.6500
11	99,999,999.00 EA	000000000100376832	Telephonic Interpreter, Kinyarwanda per min.	0.6500
12	99,999,999.00 EA	000000000100376833	Telephonic Interpreter. Non-Core Language per min.	0.6500

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number 0000000000000000000050146		Page 2 of 2
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/08/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000320968	
Vendor Telephone Nbr:		
Name Of Contact Pers:		
Contact Email:	ACCOUNTING@PROPIO-LS.COM	
FAX Number:		

Vendor
Remit to: PROPIO LS LLC
10801 MASTIN ST STE 580
OVERLAND PARK KS 66210

Name and
Address
of Vendor: PROPIO LS LLC
10801 MASTIN ST STE 580
OVERLAND PARK KS 66210

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement.
The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date.
The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement.
Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.

Line Number	Quantity	UNIT	Article and Description	Unit Price
The following UN/CEFACT Unit of Measure Common Codes are used in this document:				
		EA	Each	

Signature of Purchasing Officer	Typed Name	Signature Of Approval Office Of the State Attorney General	
	Date Signed	Typed Name	Date Signed
Authorized Signature	Indiana Department Of Administration Procurement Division 402 West Washington Street, Rm W468 Indianapolis, Indiana 46204 Telephone: (317) 232-3150		

Quantity Purchase Agreement With The State Of Indiana

Vendor AD ASTRA INC
Remit to: 8701 GEORGIA AVE STE 800
SILVER SPRING MD 20910

Name and AD ASTRA INC
Address
of Vendor: 8701 GEORGIA AVE STE 800
SILVER SPRING MD 20910

Qty Purchase Agreement QPA Number	Page
0000000000000000000050248	1 of 4
Requisition Nbr.:	Interpretation Services
Effective Date:	01/13/2021
Expiration Date:	02/01/2023
Agency Number:	
Facility:	ASA 20-1311
Vendor ID:	0000392081
Vendor Telephone Nbr:	
Name Of Contact Pers:	
Contact Email:	RECEIVABLES@AD-ASTRAINC.COM
FAX Number:	

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement.

The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date.

The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement.

Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.

Line Number	Quantity	UNIT	Article and Description	Unit Price
-------------	----------	------	-------------------------	------------

This is an award of a Quantity Purchase Agreement for in-person interpretive services. The QPA can be mutually renewed yearly for three (2) additional years. The vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration date, but issued prior to the expiration date, and postmarked no later than 14 business days after the QPA's expiration date. Quantities are estimates and could be more or less.

Service Regions: In-person Spoken Language: Southeast, Southwest

To request services from this vendor, Online: www.scheduleinterpreter.com/ad-astra, call: 301.408.4242 (option 2) or email interpreting@ad-astrainc.com. To discuss items related to billing/invoicing, please contact Gbenga Adeleye email: receivables@ad-astrainc.com Phone: 301.408.4242 (option 6) For all other customer service needs, please contact Rayna Smith 301.408.4242 ext. 102 Rayna@ad-astrainc.com Chris Elznic 301.408.4242 (option 2) interpreting@ad-astrainc.com To contact the IDOA Vendor Contract Manager, Jacob Pardue, email JPardue1@doa.in.gov or call 317-232-8157.

Please note the following contract details: - After hours pricing is in effect during any state-observed holiday, weekends (beginning after p.m. Friday until 8 a.m. the following Monday) and between 6 p.m. and 8 a.m. Monday through Friday. - For all billable time after the applicable minimums (two hours for all in-person interpreters), the State will be billed at the appropriate hourly rate in 15-minutes increments, rounded up to the nearest 15 minutes. The vendor requests that agencies schedule appointments for as close to the expected duration as possible in order to avoid lost time for interpreters. - In the event an interpreter is required to appear in court to testify as a witness and the State agency serviced has provided prior approval, the Contractor may only invoice for the amount of time the interpreter was required to appear. - With prior State approval, the Contractor may bill for all mileage (to and from the destination) for all assignments 50+ miles (one way) from the interpreter's starting point. - VRI services are available on demand, 24/7. These services are Web-based and require only a high-speed Internet connection, webcam and computer. Please use the same contact information provided above to request these services. - The Contractor may bill for one hour for all non-ASL in-person appointments cancelled 24 hours prior to the appointment time. This does not apply to unforeseen closures to State offices (e.g. weather-related closures).

3	99,999,999.00	HUR000000000100376765	Interpretation In-Person Spanish South East Region two hour min.	38.0000
4	99,999,999.00	HUR000000000100376766	Interpretation In-Person Spanish South West Region two hour min.	38.0000
5	99,999,999.00	HUR000000000100376767	Interpretation In-Person Burmese South East Region two hour min.	57.0000
6	99,999,999.00	HUR000000000100376768	Interpretation In-Person Burmese South West Region two hour min.	57.0000
7	99,999,999.00	HUR000000000100376769	Interpretation In-Person Chin South East Region two hour min.	57.0000
8	99,999,999.00	HUR000000000100376770	Interpretation In-Person Chin South West Region two hour min.	57.0000
9	99,999,999.00	HUR000000000100376771	Interpretation In-Person Arabic South East Region two hour min.	57.0000

Qty Purchase Agreement QPA Number		Page
000000000000000000050248		2 of 4
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/13/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000392081	
Vendor Telephone Nbr:		
Name Of Contact Pers:		
Contact Email:	RECEIVABLES@AD-ASTRAIN.COM	
FAX Number:		

Name and Address of Vendor: AD ASTRA INC
8701 GEORGIA AVE STE 800
SILVER SPRING MD 20910

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement.

The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date. The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement.

Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.

Line Number	Quantity	UNIT	Article and Description	Unit Price
10	99,999,999.00	HUR0000000000100376772 hour min.	Interpretation In-Person Arabic South West Region two	57.0000
11	99,999,999.00	HUR0000000000100376773 hour min.	Interpretation In-Person French South East Region two	57.0000
12	99,999,999.00	HUR0000000000100376774 hour min.	Interpretation In-Person French South West Region two	57.0000
13	99,999,999.00	HUR0000000000100376775 hour min.	Interpretation In-Person Karen South East Region two	57.0000
14	99,999,999.00	HUR0000000000100376776 hour min.	Interpretation In-Person Karen South West Region two	57.0000
15	99,999,999.00	HUR0000000000100376777 two hour min.	Interpretation In-Person Vietnamese South East Region	57.0000
16	99,999,999.00	HUR0000000000100376778 two hour min.	Interpretation In-Person Vietnamese South West Region	57.0000
17	99,999,999.00	HUR0000000000100376779 two hour min.	Interpretation In-Person Swahili South East Region	57.0000
18	99,999,999.00	HUR0000000000100376780 two hour min.	Interpretation In-Person Swahili South West Region	57.0000
19	99,999,999.00	HUR0000000000100376781 two hour min.	Interpretation In-Person Mandarin South East Region	57.0000
20	99,999,999.00	HUR0000000000100376782 two hour min.	Interpretation In-Person Mandarin South West Region	57.0000
21	99,999,999.00	HUR0000000000100376783 Region two hour min.	Interpretation In-Person Kinyarwanda South East	57.0000
22	99,999,999.00	HUR0000000000100376784 Region two hour min.	Interpretation In-Person Kinyarwanda South West	57.0000
23	99,999,999.00	HUR0000000000100376785 two hour min.	Interpretation In-Person Non-Core South East Region	57.0000
24	99,999,999.00	HUR0000000000100376786 two hour min.	Interpretation In-Person Non-Core South West Region	57.0000
25	99,999,999.00	HUR0000000000100376787	After-HUR In-Person Spanish South East Region. Weekends and after 6pm M-F 2 Hour Min.	57.0000
26	99,999,999.00	HUR0000000000100376788	After-HUR In-Person Spanish South West Region. Weekends and after 6pm M-F 2 hour min.	60.0000
27	99,999,999.00	HUR0000000000100376789	After-HUR In-Person Burmese South East Region. Weekends and after 6pm M-F 2 Hour Min.	60.0000
28	99,999,999.00	HUR0000000000100376790	After-HUR In-Person Burmese South West Region. Weekends and after 6pm M-F 2 hour min.	60.0000

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number		Page
000000000000000000050248		3 of 4
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/13/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000392081	
Vendor Telephone Nbr:		
Name Of Contact Pers:		
Contact Email:	RECEIVABLES@AD-ASTRAIN.COM	
FAX Number:		

Vendor: AD ASTRA INC
Remit to: 8701 GEORGIA AVE STE 800
SILVER SPRING MD 20910

Name and Address of Vendor: AD ASTRA INC
8701 GEORGIA AVE STE 800
SILVER SPRING MD 20910

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement. The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date. The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement. **Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.**

Line Number	Quantity	UNIT	Article and Description	Unit Price
29	99,999,999.00	HUR000000000100376791	After-HUR In-Person Chin South East Region. Weekends and after 6pm M-F 2 Hour Min.	60.0000
30	99,999,999.00	HUR000000000100376792	After-HUR In-Person Chin South West Region. Weekends and after 6pm M-F 2 hour min.	60.0000
31	99,999,999.00	HUR000000000100376793	After-HUR In-Person Arabic South East Region. Weekends and after 6pm M-F 2 Hour Min.	60.0000
32	99,999,999.00	HUR000000000100376794	After-HUR In-Person Arabic South West Region. Weekends and after 6pm M-F 2 hour min.	60.0000
33	99,999,999.00	HUR000000000100376795	After-HUR In-Person French South East Region. Weekends and after 6pm M-F 2 Hour Min.	60.0000
34	99,999,999.00	HUR000000000100376796	After-HUR In-Person French South West Region. Weekends and after 6pm M-F 2 hour min.	60.0000
35	99,999,999.00	HUR000000000100376797	After-HUR In-Person Karen South East Region. Weekends and after 6pm M-F 2 Hour Min.	60.0000
36	99,999,999.00	HUR000000000100376798	After-HUR In-Person Karen South West Region. Weekends and after 6pm M-F 2 hour min.	60.0000
37	99,999,999.00	HUR000000000100376799	After-HUR In-Person Vietnamese South East Region. Weekends and after 6pm M-F 2 Hour Min.	60.0000
38	99,999,999.00	HUR000000000100376800	After-HUR In-Person Vietnamese South West Region. Weekends and after 6pm M-F 2 hour min.	60.0000
39	99,999,999.00	HUR000000000100376801	After-HUR In-Person Swahili South East Region. Weekends and after 6pm M-F 2 Hour Min.	60.0000
40	99,999,999.00	HUR000000000100376802	After-HUR In-Person Swahili South West Region. Weekends and after 6pm M-F 2 hour min.	60.0000
41	99,999,999.00	HUR000000000100376803	After-HUR In-Person Mandarin South East Region. Weekends and after 6pm M-F 2 Hour Min.	60.0000
42	99,999,999.00	HUR000000000100376804	After-HUR In-Person Mandarin South West Region. Weekends and after 6pm M-F 2 hour min.	60.0000
43	99,999,999.00	HUR000000000100376805	After-HUR In-Person Kinyarwanda South East Region. Weekends and after 6pm M-F 2 Hour Min.	60.0000
44	99,999,999.00	HUR000000000100376806	After-HUR In-Person Kinyarwanda South West Region. Weekends and after 6pm M-F 2 hour min.	60.0000
45	99,999,999.00	HUR000000000100376807	After-HUR In-Person Non-Core South East Region. Weekends and after 6pm M-F 2 Hour Min.	60.0000
46	99,999,999.00	HUR000000000100376808	After-HUR In-Person Non-Core South West Region. Weekends and after 6pm M-F 2 hour min.	60.0000
47	99,999,999.00	HUR000000000100376809	Video Remote Interpreting All Languages South East	179.4000

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number		Page
0000000000000000000050248		4 of 4
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/13/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000392081	
Vendor Telephone Nbr:		
Name Of Contact Pers:		
Contact Email:	RECEIVABLES@AD-ASTRAINCC.COM	
FAX Number:		

Vendor: AD ASTRA INC
Remit to: 8701 GEORGIA AVE STE 800
SILVER SPRING MD 20910

Name and Address of Vendor: AD ASTRA INC
8701 GEORGIA AVE STE 800
SILVER SPRING MD 20910

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement. The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date. The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement. **Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.**

Line Number	Quantity	UNIT	Article and Description	Unit Price
			Region 1 Hour min.	
48	99,999,999.00	HUR000000000100376810	Video Remote Interpreting All Languages South West Region 1 Hour Min.	179.4000
49	99,999,999.00	EA 000000000100376811	Over the phone scheduling spanish per minute during normal business hours	0.5900
50	99,999,999.00	EA 000000000100376812	Over the phone scheduling Burmese per minute during normal business hours	0.7600
51	99,999,999.00	EA 000000000100376813	Over the phone scheduling Chin per minute during normal business hours	0.7600
52	99,999,999.00	EA 000000000100376814	Over the phone scheduling Arabic per minute during normal business hours	0.7600
53	99,999,999.00	EA 000000000100376815	Over the phone scheduling French per minute during normal business hours	0.7600
54	99,999,999.00	EA 000000000100376816	Over the phone scheduling Karen per minute during normal business hours	0.7600
55	99,999,999.00	EA 000000000100376817	Over the phone scheduling Vietnamese per minute during normal business hours	0.7600
56	99,999,999.00	EA 000000000100376818	Over the phone scheduling Swahili per minute during normal business hours	0.7600
57	99,999,999.00	EA 000000000100376819	Over the phone scheduling Mandarin per minute during normal business hours	0.7600
58	99,999,999.00	EA 000000000100376820	Over the phone scheduling Kinyarwanda per minute during normal business hours	0.7600
59	99,999,999.00	EA 000000000100376821	Over the phone scheduling Non-Core per minute during normal business hours	0.8900
60	99,999,999.00	MI 000000000100376822	Mileage for interpreter that travels 51+ miles for appointment	0.3900

The following UN/CEFACT Unit of Measure Common Codes are used in this document:
EA Each
HUR Hour
MI Mile

Signature of Purchasing Officer	Typed Name	Signature Of Approval Office Of the State Attorney General	
	Date Signed	Typed Name	Date Signed
Authorized Signature	Indiana Department Of Administration Procurement Division 402 West Washington Street, Rm W468 Indianapolis, Indiana 46204 Telephone: (317) 232-3150		

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number	0000000000000000000050143	Page	1 of 7
Requisition Nbr.:	Interpretation Services		
Effective Date:	01/08/2021		
Expiration Date:	02/01/2023		
Agency Number:			
Facility:	ASA 20-1311		
Vendor ID:	0000109828		
Vendor Telephone Nbr:			
Name Of Contact Pers:			
Contact Email:	ACCOUNTING@LUNA360.COM		
FAX Number:			

Vendor: INDIANAPOLIS INTERPRETERS INC
Remit to: LUNA LANGUAGE SERVICES
8935 N MERIDIAN ST STE 250
INDIANAPOLIS IN 46260

Name and Address of Vendor: INDIANAPOLIS INTERPRETERS INC
LUNA LANGUAGE SERVICES
8935 N MERIDIAN ST STE 250
INDIANAPOLIS IN 46260

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement. The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date. The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement. **Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.**

Line Number	Quantity	UNIT	Article and Description	Unit Price
-------------	----------	------	-------------------------	------------

This is an award of a Quantity Purchase Agreement for in-person interpretive services. The QPA can be mutually renewed yearly for three (2) additional years. The vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration date, but issued prior to the expiration date, and postmarked no later than 14 business days after the QPA's expiration date. Quantities are estimates and could be more or less.

Service Regions: In-person Spoken Language: Northeast, Northwest, Central CAS (ASL/CART Services): Statewide

Please note the following contract details: - After hours pricing is in effect during any state-observed holiday, weekends (beginning after p.m. Friday until 8 a.m. the following Monday) and between 6 p.m. and 8 a.m. Monday through Friday. - There is a two-hour minimum for all in-person American Sign Language interpretation appointments, including after hours. There is a one-hour minimum for all other in-person interpretation appointments, including after hours. - Per-minute pricing for VRI and over-the-phone appointment assistance may be rounded to the nearest half minute. - The vendor will utilize interpreters that hold Indiana Interpreter Certification (IIC) when possible. All ASL interpreters providing services at the Indiana School for the Deaf will hold IIC as well as a Registry of Interpreters for the Deaf (RID) certification. The same qualifications apply to VRI services. - Due to the shortage of interpreters in Indiana as well as the nation, exceptions may be made for non-IIC interpreters based on the nature of the job and with the written approval of the requesting State agency or governmental body. Non-IIC interpreters fall into two categories: "Non-IIC" and "Provisional." The term "Provisional" has a unique definition within this agreement that is different from the IIC definition. Provisional interpreters must complete the vendor's internal screening and training processes and hold at least one of three qualifiers described in the contract. Each of these qualifiers requires at least 5 years' interpreting experience. - For all billable time after the applicable minimums (two hours for ASL and one hour for all other in-person interpreters), the State will be billed at the appropriate hourly rate in 15-minutes increments, rounded up to the nearest 15 minutes. The vendor requests that agencies schedule appointments for as close to the expected duration as possible in order to avoid lost time for interpreters. - In the event an interpreter is required to appear in court to testify as a witness and the State agency serviced has provided prior approval, the Contractor may only invoice for the amount of time the interpreter was required to appear. However, in the case of ASL interpreters, the Contractor may invoice for the two-hour minimum, plus any additional time beyond two hours during which the interpreter was required to appear. - With prior State approval, the Contractor may bill for all mileage (to and from the destination) for all assignments 50+ miles (one way) from the interpreter's starting point. - VRI services are available on demand, 24/7. These services are Web-based and require only a high-speed Internet connection, webcam and computer. Please use the same contact information provided above to request these services. - The Contractor may bill for two hours for an ASL appointment cancelled less than 48 hours prior to the appointment time, assuming the appointment was made more than two days in advance. If the appointment was made less than 48 hours in advance but greater than 24 hours in advance, at least 24 hours notice must be given to avoid this charge. This does not apply to unforeseen closures to State offices (e.g. weather-related closures). - The Contractor may bill for one hour for all non-ASL in-person appointments cancelled 24 hours prior to the appointment time. This does not apply to unforeseen closures to State offices (e.g. weather-related closures).

To request services from this vendor, call 317.341.4137 or email state@LUNA360.com. To discuss items related to billing/invoicing, please email state@LUNA360.com. For all other customer service needs, please contact Rebecca Buchan (ASL/CART Services) 317.341.4137. rebecca@LUNA360.com NA Phaw (Spoken Language) 317.341.4137 naw@LUNA360.com To contact the IDOA Vendor Contract Manager, Jacob Pardue, email JPardue1@idoa.in.gov or

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number		Page
0000000000000000000050143		2 of 7
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/08/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000109828	
Vendor Telephone Nbr:		
Name Of Contact Pers:		
Contact Email:	ACCOUNTING@LUNA360.COM	
FAX Number:		

Vendor: INDIANAPOLIS INTERPRETERS INC
Remit to: LUNA LANGUAGE SERVICES
8935 N MERIDIAN ST STE 250
INDIANAPOLIS IN 46260

Name and Address of Vendor: INDIANAPOLIS INTERPRETERS INC
LUNA LANGUAGE SERVICES
8935 N MERIDIAN ST STE 250
INDIANAPOLIS IN 46260

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement. The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date. The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement. **Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.**

Line Number	Quantity	UNIT	Article and Description	Unit Price
	call 317-232-8157.			
9	99,999,999.00	HUR000000000100376037 Minimum 1 hour	Interpretation In-Person Spanish Central Region	45.0000
10	99,999,999.00	HUR000000000100376038 Minimum 1 hour	Interpretation In-Person Spanish North East Region	45.0000
11	99,999,999.00	HUR000000000100376039 minimum 1 hour	Interpretation In-Person Spanish North West Region	45.0000
12	99,999,999.00	HUR000000000100376040 Minimum 1 hour	Interpretation In-Person Burmese Central Region	55.0000
13	99,999,999.00	HUR000000000100376041 Minimum 1 hour	Interpretation In-Person Burmese North East Region	55.0000
14	99,999,999.00	HUR000000000100376042 minimum 1 hour	Interpretation In-Person Burmese North West Region	100.0000
15	99,999,999.00	HUR000000000100376043 1 hour	Interpretation In-Person Chin Central Region Minimum	55.0000
16	99,999,999.00	HUR000000000100376044 Minimum 1 hour	Interpretation In-Person Chin North East Region	100.0000
17	99,999,999.00	HUR000000000100376045 minimum 1 hour	Interpretation In-Person Chin North West Region	100.0000
18	99,999,999.00	HUR000000000100376046 Minimum 1 hour	Interpretation In-Person Arabic Central Region	55.0000
19	99,999,999.00	HUR000000000100376047 Minimum 1 hour	Interpretation In-Person Arabic North East Region	100.0000
20	99,999,999.00	HUR000000000100376048 minimum 1 hour	Interpretation In-Person Arabic North West Region	100.0000
21	99,999,999.00	HUR000000000100376049 Minimum 1 hour	Interpretation In-Person French Central Region	55.0000
22	99,999,999.00	HUR000000000100376050 Minimum 1 hour	Interpretation In-Person French North East Region	100.0000
23	99,999,999.00	HUR000000000100376051 minimum 1 hour	Interpretation In-Person French North West Region	100.0000
24	99,999,999.00	HUR000000000100376052 1 hour	Interpretation In-Person Karen Central Region Minimum	55.0000
25	99,999,999.00	HUR000000000100376053 Minimum 1 hour	Interpretation In-Person Karen North East Region	100.0000
26	99,999,999.00	HUR000000000100376054 minimum 1 hour	Interpretation In-Person Karen North West Region	100.0000
27	99,999,999.00	HUR000000000100376055	Interpretation In-Person Vietnamese Central Region	55.0000

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number		Page
000000000000000000050143		3 of 7
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/08/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000109828	
Vendor Telephone Nbr:		
Name Of Contact Pers:		
Contact Email:	ACCOUNTING@LUNA360.COM	
FAX Number:		

Vendor
Remit to: INDIANAPOLIS INTERPRETERS INC
LUNA LANGUAGE SERVICES
8935 N MERIDIAN ST STE 250
INDIANAPOLIS IN 46260

Name and
Address
of Vendor: INDIANAPOLIS INTERPRETERS INC
LUNA LANGUAGE SERVICES
8935 N MERIDIAN ST STE 250
INDIANAPOLIS IN 46260

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement.
The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date.
The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement.
Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.

Line Number	Quantity	UNIT	Article and Description	Unit Price
		Minimum 1 hour		
28	99,999,999.00	HUR000000000100376056	Interpretation In-Person Vietnamese North East Region	100.0000
		Minimum 1 hour		
29	99,999,999.00	HUR000000000100376057	Interpretation In-Person Vietnamese North West Region	100.0000
		minimum 1 hour		
30	99,999,999.00	HUR000000000100376058	Interpretation In-Person Swahili Central Region	55.0000
		Minimum 1 hour		
31	99,999,999.00	HUR000000000100376059	Interpretation In-Person Swahili North East Region	100.0000
		Minimum 1 hour		
32	99,999,999.00	HUR000000000100376060	Interpretation In-Person Swahili North West Region	100.0000
		minimum 1 hour		
33	99,999,999.00	HUR000000000100376061	Interpretation In-Person Mandarin Central Region	55.0000
		Minimum 1 hour		
34	99,999,999.00	HUR000000000100376062	Interpretation In-Person Mandarin North East Region	100.0000
		Minimum 1 hour		
35	99,999,999.00	HUR000000000100376063	Interpretation In-Person Mandarin North West Region	100.0000
		minimum 1 hour		
36	99,999,999.00	HUR000000000100376064	Interpretation In-Person Kinyarwanda Central Region	55.0000
		Minimum 1 hour		
37	99,999,999.00	HUR000000000100376065	Interpretation In-Person Kinyarwanda North East	100.0000
		Region Minimum 1 hour		
38	99,999,999.00	HUR000000000100376066	Interpretation In-Person Kinyarwanda North West	100.0000
		Region minimum 1 hour		
39	99,999,999.00	HUR000000000100376067	Interpretation In-Person Non-Core Central Region	60.0000
		Minimum 1 hour		
40	99,999,999.00	HUR000000000100376068	Interpretation In-Person Non-Core North East Region	105.0000
		Minimum 1 hour		
41	99,999,999.00	HUR000000000100376069	Interpretation In-Person Non-Core North West Region	105.0000
		minimum 1 hour		
42	99,999,999.00	HUR000000000100376070	After-HUR In-Person Spanish Central Region. Weekends	45.0000
		and after 6pm M-F		
43	99,999,999.00	HUR000000000100376071	After-HUR In-Person Spanish North East Region.	45.0000
		Weekends and after 6pm M-F		
44	99,999,999.00	HUR000000000100376072	After-HUR In-Person Spanish North West Region.	45.0000
		Weekends and after 6pm M-F		
45	99,999,999.00	HUR000000000100376073	After-HUR In-Person Burmese Central Region. Weekends	55.0000
		and after 6pm M-F		
46	99,999,999.00	HUR000000000100376074	After-HUR In-Person Burmese North East Region.	100.0000

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number		Page
000000000000000000050143		4 of 7
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/08/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000109828	
Vendor Telephone Nbr:		
Name Of Contact Pers:		
Contact Email:	ACCOUNTING@LUNA360.COM	
FAX Number:		

Vendor: INDIANAPOLIS INTERPRETERS INC
Remit to: LUNA LANGUAGE SERVICES
8935 N MERIDIAN ST STE 250
INDIANAPOLIS IN 46260

Name and Address of Vendor: INDIANAPOLIS INTERPRETERS INC
LUNA LANGUAGE SERVICES
8935 N MERIDIAN ST STE 250
INDIANAPOLIS IN 46260

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement. The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date. The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement. **Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.**

Line Number	Quantity	UNIT	Article and Description	Unit Price
			Weekends and after 6pm M-F	
47	99,999,999.00	HUR000000000100376075	After-HUR In-Person Burmese North West Region. Weekends and after 6pm M-F	100.0000
48	99,999,999.00	HUR000000000100376076	After-HUR In-Person Chin Central Region. Weekends and after 6pm M-F	55.0000
49	99,999,999.00	HUR000000000100376077	After-HUR In-Person Chin North East Region. Weekends and after 6pm M-F	100.0000
50	99,999,999.00	HUR000000000100376078	After-HUR In-Person Chin North West Region. Weekends and after 6pm M-F	100.0000
51	99,999,999.00	HUR000000000100376079	After-HUR In-Person Arabic Central Region. Weekends and after 6pm M-F	55.0000
52	99,999,999.00	HUR000000000100376080	After-HUR In-Person Arabic North East Region. Weekends and after 6pm M-F	100.0000
53	99,999,999.00	HUR000000000100376081	After-HUR In-Person Arabic North West Region. Weekends and after 6pm M-F	100.0000
54	99,999,999.00	HUR000000000100376082	After-HUR In-Person French Central Region. Weekends and after 6pm M-F	55.0000
55	99,999,999.00	HUR000000000100376083	After-HUR In-Person French North East Region. Weekends and after 6pm M-F	100.0000
56	99,999,999.00	HUR000000000100376084	After-HUR In-Person French North West Region. Weekends and after 6pm M-F	100.0000
57	99,999,999.00	HUR000000000100376085	After-HUR In-Person Karen Central Region. Weekends and after 6pm M-F	55.0000
58	99,999,999.00	HUR000000000100376086	After-HUR In-Person Karen North East Region. Weekends and after 6pm M-F	100.0000
59	99,999,999.00	HUR000000000100376087	After-HUR In-Person Karen North West Region. Weekends and after 6pm M-F	100.0000
60	99,999,999.00	HUR000000000100376088	After-HUR In-Person Vietnamese Central Region. Weekends and after 6pm M-F	55.0000
61	99,999,999.00	HUR000000000100376089	After-HUR In-Person Vietnamese North East Region. Weekends and after 6pm M-F	100.0000
62	99,999,999.00	HUR000000000100376090	After-HUR In-Person Vietnamese North West Region. Weekends and after 6pm M-F	100.0000
63	99,999,999.00	HUR000000000100376091	After-HUR In-Person Swahili Central Region. Weekends and after 6pm M-F	55.0000
64	99,999,999.00	HUR000000000100376092	After-HUR In-Person Swahili North East Region. Weekends and after 6pm M-F	100.0000
65	99,999,999.00	HUR000000000100376093	After-HUR In-Person Swahili North West Region.	100.0000

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number		Page
000000000000000000050143		5 of 7
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/08/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000109828	
Vendor Telephone Nbr:		
Name Of Contact Pers:		
Contact Email:	ACCOUNTING@LUNA360.COM	
FAX Number:		

Vendor: INDIANAPOLIS INTERPRETERS INC
Remit to: LUNA LANGUAGE SERVICES
8935 N MERIDIAN ST STE 250
INDIANAPOLIS IN 46260

Name and Address of Vendor: INDIANAPOLIS INTERPRETERS INC
LUNA LANGUAGE SERVICES
8935 N MERIDIAN ST STE 250
INDIANAPOLIS IN 46260

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement. The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date. The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement. **Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.**

Line Number	Quantity	UNIT	Article and Description	Unit Price
			Weekends and after 6pm M-F	
66	99,999,999.00	HUR000000000100376094	After-HUR In-Person Mandarin Central Region. Weekends and after 6pm M-F	55.0000
67	99,999,999.00	HUR000000000100376095	After-HUR In-Person Mandarin North East Region. Weekends and after 6pm M-F	100.0000
68	99,999,999.00	HUR000000000100376096	After-HUR In-Person Mandarin North West Region. Weekends and after 6pm M-F	100.0000
69	99,999,999.00	HUR000000000100376097	After-HUR In-Person Kinyarwanda Central Region. Weekends and after 6pm M-F	55.0000
70	99,999,999.00	HUR000000000100376098	After-HUR In-Person Kinyarwanda North East Region. Weekends and after 6pm M-F	100.0000
71	99,999,999.00	HUR000000000100376099	After-HUR In-Person Kinyarwanda North West Region. Weekends and after 6pm M-F	100.0000
72	99,999,999.00	HUR000000000100376100	After-HUR In-Person Non-Core Central Region. Weekends and after 6pm M-F	60.0000
73	99,999,999.00	HUR000000000100376101	After-HUR In-Person Non-Core North East Region. Weekends and after 6pm M-F	105.0000
74	99,999,999.00	HUR000000000100376102	After-HUR In-Person Non-Core North West Region. Weekends and after 6pm M-F	105.0000
75	99,999,999.00	HUR000000000100376103	Court Interpreting, Indiana State Supreme Court Certified and Indiana Supreme Court Qualified Legal Interpreter, All Languages two hour min Central Region	120.0000
76	99,999,999.00	HUR000000000100376104	Court Interpreting, Indiana State Supreme Court Certified and Indiana Supreme Court Qualified Legal Interpreter, All Languages two hour min North East Region	120.0000
77	99,999,999.00	HUR000000000100376105	Court Interpreting, Indiana State Supreme Court Certified and Indiana Supreme Court Qualified Legal Interpreter, All Languages two hour min North West Region	120.0000
78	99,999,999.00	HUR000000000100376106	Video Remote Interpreting Central Region All Languages	55.0000
79	99,999,999.00	HUR000000000100376107	Video Remote Interpreting North East Region All Languages	55.0000
80	99,999,999.00	HUR000000000100376108	Video Remote Interpreting North West Region All Languages	55.0000
81	99,999,999.00	EA 000000000100376109	Over the phone scheduling spanish per minute during normal business hours	0.9900
82	99,999,999.00	EA 000000000100376110	Over the phone scheduling Burmese per minute during normal business hours	0.9900
83	99,999,999.00	EA 000000000100376111	Over the phone scheduling Chin per minute during	0.9900

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number		Page
0000000000000000000050143		6 of 7
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/08/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000109828	
Vendor Telephone Nbr:		
Name Of Contact Pers:		
Contact Email:	ACCOUNTING@LUNA360.COM	
FAX Number:		

Vendor
Remit to: INDIANAPOLIS INTERPRETERS INC
LUNA LANGUAGE SERVICES
8935 N MERIDIAN ST STE 250
INDIANAPOLIS IN 46260

Name and
Address
of Vendor: INDIANAPOLIS INTERPRETERS INC
LUNA LANGUAGE SERVICES
8935 N MERIDIAN ST STE 250
INDIANAPOLIS IN 46260

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement.
The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date.
The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement.
Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.

Line Number	Quantity	UNIT	Article and Description	Unit Price
		normal business hours		
84	99,999,999.00	EA 000000000100376112	Over the phone scheduling Arabic per minute during normal business hours	0.9900
85	99,999,999.00	EA 000000000100376113	Over the phone scheduling French per minute during normal business hours	0.9900
86	99,999,999.00	EA 000000000100376114	Over the phone scheduling Karen per minute during normal business hours	0.9900
87	99,999,999.00	EA 000000000100376115	Over the phone scheduling Vietnamese per minute during normal business hours	0.9900
88	99,999,999.00	EA 000000000100376116	Over the phone scheduling Swahili per minute during normal business hours	0.9900
89	99,999,999.00	EA 000000000100376117	Over the phone scheduling Mandarin per minute during normal business hours	0.9900
90	99,999,999.00	EA 000000000100376118	Over the phone scheduling Kinyarwanda per minute during normal business hours	0.9900
91	99,999,999.00	EA 000000000100376119	Over the phone scheduling Non-Core per minute during normal business hours	0.9900
93	99,999,999.00	HUR000000000100376121	Interpretation In-Person ASL Grandfathered 2 hour min.	40.0000
94	99,999,999.00	HUR000000000100376122	Interpretation In-Person ASL Provisional 2 hour min.	35.0000
95	99,999,999.00	HUR000000000100376123	Interpretation In-Person ASL Non-IIC 2 hour min.	25.0000
96	99,999,999.00	HUR000000000100376124	After-HUR in-person ASL IIC	40.0000
97	99,999,999.00	HUR000000000100376125	Nationally Certified CAS interpreter with less than 10 years experience.	50.0000
98	99,999,999.00	HUR000000000100376126	Nationally Certified > 10 years and < 15 years	55.0000
99	99,999,999.00	HUR000000000100376127	Nationally Certified > 15 years	60.0000
100	99,999,999.00	HUR000000000100376128	Educaitonal Interpreting, K-12/EIPA State of Indiana Certified Interpreter	55.0000
101	99,999,999.00	HUR000000000100376129	CAS Court Interpreter, Indiana State Supreme Court Qualified Interpreter	120.0000
102	99,999,999.00	HUR000000000100376130	Video Remote Interpreter American Sign Language	65.0000
103	99,999,999.00	HUR000000000100376131	Audio Description and Captioning	360.0000
104	99,999,999.00	HUR000000000100376132	CART (Court Reporting School Certificate) or 180 workds per minute literary, 225 words per minute Q and A or Speech to test	80.0000
105	99,999,999.00	HUR000000000100376133	CART (NCRA CRR -Certified Real time Reporter or CCP - Certified CART Provider)/National Speech to Text	110.0000

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number		Page
0000000000000000000050143		7 of 7
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/08/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000109828	
Vendor Telephone Nbr:		
Name Of Contact Pers:		
Contact Email:	ACCOUNTING@LUNA360.COM	
FAX Number:		

Vendor
Remit to: INDIANAPOLIS INTERPRETERS INC
LUNA LANGUAGE SERVICES
8935 N MERIDIAN ST STE 250
INDIANAPOLIS IN 46260

Name and
Address
of Vendor: INDIANAPOLIS INTERPRETERS INC
LUNA LANGUAGE SERVICES
8935 N MERIDIAN ST STE 250
INDIANAPOLIS IN 46260

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement.

The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date.

The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement.

Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.

Line Number	Quantity	UNIT	Article and Description	Unit Price
106	99,999,999.00	HUR000000000100376134	CART non certified	50.0000
107	99,999,999.00	HUR000000000100403238	Travel time for interpreter traveling 50+ miles round trip	35.0000

The following UN/CEFACT Unit of Measure
Common Codes are used in this document:
EA Each
HUR Hour

Signature of Purchasing Officer	Typed Name	Signature Of Approval Office Of the State Attorney General	
	Date Signed	Typed Name	Date Signed
Authorized Signature	Indiana Department Of Administration Procurement Division 402 West Washington Street, Rm W468 Indianapolis, Indiana 46204 Telephone: (317) 232-3150		

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number	Page
0000000000000000000050145	1 of 5
Requisition Nbr.:	Interpretation Services
Effective Date:	01/08/2021
Expiration Date:	02/01/2023
Agency Number:	
Facility:	ASA 20-1311
Vendor ID:	0000055476
Vendor Telephone Nbr:	--
Name Of Contact Pers:	
Contact Email:	FINANCE@LTCLS.COM
FAX Number:	--

Vendor: LANGUAGE TRAINING CENTER INC
Remit to: 5750 CASTLE CREEK PKWY STE 150
INDIANAPOLIS IN 46250

Name and Address of Vendor: LANGUAGE TRAINING CENTER INC
5750 CASTLE CREEK PKWY STE 150
INDIANAPOLIS IN 46250

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement. The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date. The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement. **Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.**

Line Number	Quantity	UNIT	Article and Description	Unit Price
-------------	----------	------	-------------------------	------------

This is an award of a Quantity Purchase Agreement for in-person interpretive services. The QPA can be mutually renewed yearly for three (2) additional years. The vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration date, but issued prior to the expiration date, and postmarked no later than 14 business days after the QPA's expiration date. Quantities are estimates and could be more or less.

To request services from this vendor, call 317.578.4577 or email interpreting@LTCLS.com. To discuss items related to billing/invoicing, please contact Jessica Fisher 317.616.3684 email jfisher@LTCLS.com. For all other customer service needs, please contact Lizzette Michel 317.220.9805 email lmicel@LTCLS.com To contact the IDOA Vendor Contract Manager, Jacob Pardue, email JPardue1@idoa.in.gov or call 317-232-8157.

Please note the following contract details: - After hours pricing is in effect during any state-observed holiday, weekends (beginning after p.m. Friday until 8 a.m. the following Monday) and between 6 p.m. and 8 a.m. Monday through Friday. - The Written Translation Services portion of this contract is based on number of words needed to be translated and on the target language selected. All requests will need to be emailed to agency point of contact preferably in the source format (Word, InDesign, Publisher, etc.) A quote for the project will be sent with cost and turnaround completion time. A \$50 minimum will be applied. - In the event an interpreter is required to appear in court to testify as a witness and the State agency serviced has provided prior approval, the Contractor may only invoice for the amount of time the interpreter was required to appear. - With prior State approval, the Contractor may bill for travel time (to and from the destination) for all assignments 50+ miles (roundtrip) from the interpreter's starting point. - VRI services are available on demand, 24/7. These services are Web-based and require only a high-speed Internet connection, webcam and computer. Please use the same contact information provided above to request these services. - The Contractor may bill for one hour for all in-person appointments cancelled 24 hours prior to the appointment time. This does not apply to unforeseen closures to State offices (e.g. weather-related closures).

Service Regions: In-person Spoken Language: Northeast, Central Written Translation: Statewide with a \$50 minimum

4	99,999,999.00	HUR000000000100376636	Interpretation In-Person Spanish North East Region	35.0000
5	99,999,999.00	HUR000000000100376637	Interpretation In-Person Spanish Central Region	35.0000
6	99,999,999.00	HUR000000000100376638	Interpretation In-Person Burmese North East Region	48.0000
7	99,999,999.00	HUR000000000100376639	Interpretation In-Person Burmese Central Region	45.0000
8	99,999,999.00	HUR000000000100376640	Interpretation In-Person Chin North East Region	48.0000
9	99,999,999.00	HUR000000000100376641	Interpretation In-Person Chin Central Region	48.0000
10	99,999,999.00	HUR000000000100376642	Interpretation In-Person Arabic North East Region	48.0000
11	99,999,999.00	HUR000000000100376643	Interpretation In-Person Arabic Central Region	48.0000
12	99,999,999.00	HUR000000000100376644	Interpretation In-Person French North East Region	48.0000
13	99,999,999.00	HUR000000000100376645	Interpretation In-Person French Central Region	48.0000
14	99,999,999.00	HUR000000000100376646	Interpretation In-Person Karen North East Region	48.0000

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number 000000000000000000050145		Page 2 of 5
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/08/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000055476	
Vendor Telephone Nbr:	--	
Name Of Contact Pers:		
Contact Email:	FINANCE@LTCLS.COM	
FAX Number:	--	

Vendor LANGUAGE TRAINING CENTER INC
Remit to: 5750 CASTLE CREEK PKWY STE 150
INDIANAPOLIS IN 46250

Name and LANGUAGE TRAINING CENTER INC
Address 5750 CASTLE CREEK PKWY STE 150
of Vendor: INDIANAPOLIS IN 46250

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement.

The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date. The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement.

Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.

Line Number	Quantity	UNIT	Article and Description	Unit Price
15	99,999,999.00	HUR000000000100376647	Interpretation In-Person Karen Central Region	48.0000
16	99,999,999.00	HUR000000000100376648	Interpretation In-Person Vietnamese North East Region	48.0000
17	99,999,999.00	HUR000000000100376649	Interpretation In-Person Vietnamese Central Region	48.0000
18	99,999,999.00	HUR000000000100376650	Interpretation In-Person Swahili North East Region	48.0000
19	99,999,999.00	HUR000000000100376651	Interpretation In-Person Swahili Central Region	48.0000
20	99,999,999.00	HUR000000000100376652	Interpretation In-Person Mandarin North East Region	48.0000
21	99,999,999.00	HUR000000000100376653	Interpretation In-Person Mandarin Central Region	48.0000
22	99,999,999.00	HUR000000000100376654	Interpretation In-Person Kinyarwanda North East Region	48.0000
23	99,999,999.00	HUR000000000100376655	Interpretation In-Person Kinyarwanda Central Region	48.0000
24	99,999,999.00	HUR000000000100376656	Interpretation In-Person Non-Core Languages North East Region	48.0000
25	99,999,999.00	HUR000000000100376657	Interpretation In-Person Non-Core Languages Central Region	48.0000
26	99,999,999.00	HUR000000000100376658	After-HUR In-Person Spanish North East Region. Weekends and after 6pm M-F	40.0000
27	99,999,999.00	HUR000000000100376659	After-HUR In-Person Spanish Central Region. Weekends and after 6pm M-F	40.0000
28	99,999,999.00	HUR000000000100376660	After-HUR In-Person Burmese North East Region. Weekends and after 6pm M-F	48.0000
29	99,999,999.00	HUR000000000100376661	After-HUR In-Person Burmese Central Region. Weekends and after 6pm M-F	48.0000
30	99,999,999.00	HUR000000000100376662	After-HUR In-Person Chin North East Region. Weekends and after 6pm M-F	48.0000
31	99,999,999.00	HUR000000000100376663	After-HUR In-Person Chin Central Region. Weekends and after 6pm M-F	48.0000
32	99,999,999.00	HUR000000000100376664	After-HUR In-Person Arabic North East Region. Weekends and after 6pm M-F	48.0000
33	99,999,999.00	HUR000000000100376665	After-HUR In-Person Arabic Central Region. Weekends and after 6pm M-F	48.0000
34	99,999,999.00	HUR000000000100376666	After-HUR In-Person French North East Region. Weekends and after 6pm M-F	48.0000
35	99,999,999.00	HUR000000000100376667	After-HUR In-Person French Central Region. Weekends and after 6pm M-F	48.0000
36	99,999,999.00	HUR000000000100376668	After-HUR In-Person Karen North East Region. Weekends	48.0000

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number 00000000000000000050145		Page 3 of 5
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/08/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000055476	
Vendor Telephone Nbr:	--	
Name Of Contact Pers:		
Contact Email:	FINANCE@LTCLS.COM	
FAX Number:	--	

Vendor Remit to: LANGUAGE TRAINING CENTER INC
5750 CASTLE CREEK PKWY STE 150
INDIANAPOLIS IN 46250

Name and Address of Vendor: LANGUAGE TRAINING CENTER INC
5750 CASTLE CREEK PKWY STE 150
INDIANAPOLIS IN 46250

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement. The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date. The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement. **Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.**

Line Number	Quantity	UNIT	Article and Description	Unit Price
		and after 6pm M-F		
37	99,999,999.00	HUR000000000100376669	After-HUR In-Person Karen Central Region. Weekends and after 6pm M-F	48.0000
38	99,999,999.00	HUR000000000100376670	After-HUR In-Person Vietnamese North East Region. Weekends and after 6pm M-F	48.0000
39	99,999,999.00	HUR000000000100376671	After-HUR In-Person Vietnamese Central Region. Weekends and after 6pm M-F	48.0000
40	99,999,999.00	HUR000000000100376672	After-HUR In-Person Swahili North East Region. Weekends and after 6pm M-F	48.0000
41	99,999,999.00	HUR000000000100376673	After-HUR In-Person Swahili Central Region. Weekends and after 6pm M-F	48.0000
42	99,999,999.00	HUR000000000100376674	After-HUR In-Person Mandarin North East Region. Weekends and after 6pm M-F	48.0000
43	99,999,999.00	HUR000000000100376675	After-HUR In-Person Mandarin Central Region. Weekends and after 6pm M-F	48.0000
44	99,999,999.00	HUR000000000100376676	After-HUR In-Person Kinyarwanda North East Region. Weekends and after 6pm M-F	48.0000
45	99,999,999.00	HUR000000000100376677	After-HUR In-Person Kinyarwanda Central Region. Weekends and after 6pm M-F	48.0000
46	99,999,999.00	HUR000000000100376678	After-HUR In-Person Non-Core North East Region. Weekends and after 6pm M-F	48.0000
47	99,999,999.00	HUR000000000100376679	After-HUR In-Person Non-Core Central Region. Weekends and after 6pm M-F	48.0000
48	99,999,999.00	HUR000000000100376680	Video Remote Interpreting All Languages North East Region	55.0000
49	99,999,999.00	HUR000000000100376681	Video Remote Interpreting All Languages Central Region	55.0000
50	99,999,999.00	EA 000000000100376682	Over the phone scheduling spanish per minute during normal business hours	0.5800
51	99,999,999.00	EA 000000000100376683	Over the phone scheduling Burmese per minute during normal business hours	0.8000
52	99,999,999.00	EA 000000000100376684	Over the phone scheduling Chin per minute during normal business hours	0.8000
53	99,999,999.00	EA 000000000100376685	Over the phone scheduling Arabic per minute during normal business hours	0.8000
54	99,999,999.00	EA 000000000100376686	Over the phone scheduling French per minute during normal business hours	0.8000
55	99,999,999.00	EA 000000000100376687	Over the phone scheduling Karen per minute during normal business hours	0.8000

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number 000000000000000000050145		Page 4 of 5
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/08/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000055476	
Vendor Telephone Nbr:	--	
Name Of Contact Pers:		
Contact Email:	FINANCE@LTCLS.COM	
FAX Number:	--	

Vendor: LANGUAGE TRAINING CENTER INC
Remit to: 5750 CASTLE CREEK PKWY STE 150
INDIANAPOLIS IN 46250

Name and Address of Vendor: LANGUAGE TRAINING CENTER INC
5750 CASTLE CREEK PKWY STE 150
INDIANAPOLIS IN 46250

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement. The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date. The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement. **Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.**

Line Number	Quantity	UNIT	Article and Description	Unit Price
			normal business hours	
56	99,999,999.00	EA	000000000100376688 Over the phone scheduling Vietnamese per minute during normal business hours	0.8000
57	99,999,999.00	EA	000000000100376689 Over the phone scheduling Swahili per minute during normal business hours	0.8000
58	99,999,999.00	EA	000000000100376690 Over the phone scheduling Mandarin per minute during normal business hours	0.8000
59	99,999,999.00	EA	000000000100376691 Over the phone scheduling Kinyarwanda per minute during normal business hours	0.8000
60	99,999,999.00	EA	000000000100376692 Over the phone scheduling Non-Core per minute during normal business hours	0.8000
62	99,999,999.00	HUR	00000000000100376694 Desktop Publishing and Formatting	40.0000
63	99,999,999.00	WRD	00000000000100376695 Written Translation Spanish per word	0.1200
64	99,999,999.00	WRD	00000000000100376696 Written Translation Burmese per word	0.2200
65	99,999,999.00	WRD	00000000000100376697 Written Translation Chin per word	0.2200
66	99,999,999.00	WRD	00000000000100376698 Written Translation Arabic per word	0.2000
67	99,999,999.00	WRD	00000000000100376699 Written Translation French per word	0.2000
68	99,999,999.00	WRD	00000000000100376700 Written Translation Karen per word	0.2600
69	99,999,999.00	WRD	00000000000100376701 Written Translation Vietnamese per word	0.2300
70	99,999,999.00	WRD	00000000000100376702 Written Translation Swahili per word	0.2400
71	99,999,999.00	WRD	00000000000100376703 Written Translation Mandarin per word	0.1600
72	99,999,999.00	WRD	00000000000100376704 Written Translation Kinyarwanda per word	0.2800
73	99,999,999.00	WRD	00000000000100376705 Written Translation Non-Core per word	0.2600
74	99,999,999.00	WRD	00000000000100376706 Expedited written translations Spanish shall be completed within one standard 24-hour day from the day the service is requested for up to 2,000 workds from the day the service is requested.	0.1500
75	99,999,999.00	WRD	00000000000100376707 Expedited written translations Burmese shall be completed within one standard 24-hour day from the day the service is requested for up to 2,000 workds from the day the service is requested.	0.2700
76	99,999,999.00	WRD	00000000000100376708 Expedited written translations Chin shall be completed within one standard 24-hour day from the day the service is requested for up to 2,000 workds from the day the service is requested.	0.2700
77	99,999,999.00	WRD	00000000000100376709 Expedited written translations Arabic shall be completed within one standard 24-hour day from the day the service is requested for up to 2,000 workds from the day the service is requested.	0.2500

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number 000000000000000000050145		Page 5 of 5
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/08/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000055476	
Vendor Telephone Nbr:	--	
Name Of Contact Pers:		
Contact Email:	FINANCE@LTCLS.COM	
FAX Number:	--	

Vendor Remit to: LANGUAGE TRAINING CENTER INC
5750 CASTLE CREEK PKWY STE 150
INDIANAPOLIS IN 46250

Name and Address of Vendor: LANGUAGE TRAINING CENTER INC
5750 CASTLE CREEK PKWY STE 150
INDIANAPOLIS IN 46250

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement. The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date. The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement. Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.

Line Number	Quantity	UNIT	Article and Description	Unit Price
78	99,999,999.00	WRD000000000100376710	Expedited written translations French shall be completed within one standard 24-hour day from the day the service is requested for up to 2,000 workds from the day the service is requested.	0.2500
79	99,999,999.00	WRD000000000100376711	Expedited written translations Karen shall be completed within one standard 24-hour day from the day the service is requested for up to 2,000 workds from the day the service is requested.	0.3200
80	99,999,999.00	WRD000000000100376712	Expedited written translations Vietnamese shall be completed within one standard 24-hour day from the day the service is requested for up to 2,000 workds from the day the service is requested.	0.2800
81	99,999,999.00	WRD000000000100376713	Expedited written translations Swahili shall be completed within one standard 24-hour day from the day the service is requested for up to 2,000 workds from the day the service is requested.	0.3000
82	99,999,999.00	WRD000000000100376714	Expedited written translations Mandarin shall be completed within one standard 24-hour day from the day the service is requested for up to 2,000 workds from the day the service is requested.	0.2000
83	99,999,999.00	WRD000000000100376715	Expedited written translations Kinyarwanda shall be completed within one standard 24-hour day from the day the service is requested for up to 2,000 workds from the day the service is requested.	0.3400
84	99,999,999.00	WRD000000000100376716	Expedited written translations Non-Core shall be completed within one standard 24-hour day from the day the service is requested for up to 2,000 workds from the day the service is requested.	0.3200
85	99,999,999.00	HUR000000000100379715	Certified Interpreter- Courtroom Intepretation North East	65.0000
86	99,999,999.00	HUR000000000100379716	Certified Interpreter- Courtroom Intepretation Central	65.0000
87	99,999,999.00	HUR000000000100403240	Travel time for interpreter traveling 50+ miles round trip	35.0000
88	99,999,999.00	WRD000000000100403360	Written Translatin Minimum Requirement	50.0000

The following UN/CEFACT Unit of Measure
Common Codes are used in this document:
EA Each
HUR Hour
WRD WORD

Signature of Purchasing Officer	Typed Name	Signature Of Approval Office Of the State Attorney General	
	Date Signed	Typed Name	Date Signed
Authorized Signature	Indiana Department Of Administration Procurement Division 402 West Washington Street, Rm W468 Indianapolis, Indiana 46204 Telephone: (317) 232-3150		

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number	Page
0000000000000000000050144	1 of 3
Requisition Nbr.:	Interpretation Services
Effective Date:	01/08/2021
Expiration Date:	02/01/2023
Agency Number:	
Facility:	ASA 20-1311
Vendor ID:	0000004623
Vendor Telephone Nbr:	317-897-9763
Name Of Contact Pers:	
Contact Email:	SWARD@EASTERSEALSCROSSROADS.ORG
FAX Number:	317-897-9763

Vendor: CROSSROADS REHABILITATION CTR
Remit to: 4740 KINGSWAY DR
INDIANAPOLIS IN 46205

Name and Address of Vendor: CROSSROADS REHABILITATION CTR
INARF/CROSSROADS REHAB INC
615 N. ALABAMA STREET
SUITE 410
INDIANAPOLIS IN 46104

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement.

The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date.

The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement.

Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.

Line Number	Quantity	UNIT	Article and Description	Unit Price
-------------	----------	------	-------------------------	------------

This is an award of a Quantity Purchase Agreement for in-person interpretive services. The QPA can be mutually renewed yearly for three (2) additional years. The vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration date, but issued prior to the expiration date, and postmarked no later than 14 business days after the QPA's expiration date. Quantities are estimates and could be more or less.

Service Regions: CAS (ASL/CART Services): Central

To request services from this vendor, email interpreting@eastsealscrossroads.org. To discuss items related to billing/invoicing, please contact Sara Inman email sinman@eastersealscrossroads.org Phone: 317.466.1000 ext.2418 For all other customer service needs, please contact Stephanie Ritchie 317.479.3240 interpreting@eastersealscrossroads.org To contact the IDOA Vendor Contract Manager, Jacob Pardue, email JPardue1@idoa.in.gov or call 317-232-8157. Please note the following contract details: - After hours pricing is in effect during any state-observed holiday, weekends (beginning after p.m. Friday until 8 a.m. the following Monday) and between 6 p.m. and 8 a.m. Monday through Friday. - There is a two-hour minimum for all in-person American Sign Language interpretation appointments, including after hours. - The vendor will utilize interpreters that hold Indiana Interpreter Certification (IIC) when possible. All ASL interpreters providing services at the Indiana School for the Deaf will hold IIC as well as a Registry of Interpreters for the Deaf (RID) certification. The same qualifications apply to VRI services. - Due to the shortage of interpreters in Indiana as well as the nation, exceptions may be made for non-IIC interpreters based on the nature of the job and with the written approval of the requesting State agency or governmental body. Non-IIC interpreters fall into two categories: "Non-IIC" and "Provisional." The term "Provisional" has a unique definition within this agreement that is different from the IIC definition. Provisional interpreters must complete the vendor's internal screening and training processes and hold at least one of three qualifiers described in the contract. Each of these qualifiers requires at least 5 years' interpreting experience. - For all billable time after the applicable minimums (two hours for ASL), the State will be billed at the appropriate hourly rate in 15-minutes increments, rounded up to the nearest 15 minutes. The vendor requests that agencies schedule appointments for as close to the expected duration as possible in order to avoid lost time for interpreters. - In the event an interpreter is required to appear in court to testify as a witness and the State agency serviced has provided prior approval, the Contractor invoice for the two-hour minimum, plus any additional time beyond two hours during which the interpreter was required to appear. - With prior State approval, the Contractor may bill for all mileage (to and from the destination) for all assignments 50+ miles (one way) from the interpreter's starting point. - The Contractor may bill for two hours for an ASL appointment cancelled less than 48 hours prior to the appointment time, assuming the appointment was made more than two days in advance. If the appointment was made less than 48 hours in advance but greater than 24 hours in advance, at least 24 hours notice must be given to avoid this charge. This does not apply to unforeseen closures to State offices

Please note the following contract details: - After hours pricing is in effect during any state-observed holiday, weekends (beginning after p.m. Friday until 8 a.m. the following Monday) and between 6 p.m. and 8 a.m. Monday through Friday. - There is a two-hour minimum for all in-person American Sign Language interpretation appointments, including after hours. - The vendor will utilize interpreters that hold Indiana Interpreter Certification (IIC) when possible. All ASL interpreters providing services at the Indiana School for the Deaf will hold IIC as well as a Registry of Interpreters for the Deaf (RID) certification. The same qualifications apply to VRI services. - Due to the shortage of interpreters in Indiana as well as the nation, exceptions may be made for non-IIC interpreters based on the nature of the job and with the written approval of the requesting State agency or governmental body. Non-IIC interpreters fall into two

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number	Page
0000000000000000000050144	2 of 3
Requisition Nbr.:	Interpretation Services
Effective Date:	01/08/2021
Expiration Date:	02/01/2023
Agency Number:	
Facility:	ASA 20-1311
Vendor ID:	0000004623
Vendor Telephone Nbr:	317-897-9763
Name Of Contact Pers:	
Contact Email:	SWARD@EASTERSEALSCROSSROADS.ORG
FAX Number:	317-897-9763

Vendor: CROSSROADS REHABILITATION CTR
Remit to: 4740 KINGSWAY DR
INDIANAPOLIS IN 46205

Name and Address of Vendor: CROSSROADS REHABILITATION CTR
INARF/CROSSROADS REHAB INC
615 N. ALABAMA STREET
SUITE 410
INDIANAPOLIS IN 46104

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement.

The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date.

The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement.

Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.

Line Number	Quantity	UNIT	Article and Description	Unit Price
			categories: "Non-IIC" and "Provisional." The term "Provisional" has a unique definition within this agreement that is different from the IIC definition. Provisional interpreters must complete the vendor's internal screening and training processes and hold at least one of three qualifiers described in the contract. Each of these qualifiers requires at least 5 years' interpreting experience. - For all billable time after the applicable minimums (two hours for ASL), the State will be billed at the appropriate hourly rate in 15-minutes increments, rounded up to the nearest 15 minutes. The vendor requests that agencies schedule appointments for as close to the expected duration as possible in order to avoid lost time for interpreters. - In the event an interpreter is required to appear in court to testify as a witness and the State agency serviced has provided prior approval, the Contractor invoice for the two-hour minimum, plus any additional time beyond two hours during which the interpreter was required to appear. - With prior State approval, the Contractor may bill for all mileage (to and from the destination) for all assignments 50+ miles (one way) from the interpreter's starting point. - The Contractor may bill for two hours for an ASL appointment cancelled less than 48 hours prior to the appointment time, assuming the appointment was made more than two days in advance. If the appointment was made less than 48 hours in advance but greater than 24 hours in advance, at least 24 hours notice must be given to avoid this charge. This does not apply to unforeseen closures to State offices (e.g. weather-related closures).	
2	99,999,999.00	HUR000000000100376368	Interpretation In-Person ASL IIC 2 hour min.	48.0000
3	99,999,999.00	HUR000000000100376369	Interpretation In-Person ASL Grandfathered 2 hour min.	35.0000
4	99,999,999.00	HUR000000000100376370	Interpretation In-Person ASL Provisional 2 hour min.	30.0000
5	99,999,999.00	HUR000000000100376371	Interpretation In-Person ASL Non-IIC 2 hour min.	18.0000
6	99,999,999.00	HUR000000000100376372	After-HUR in-person ASL IIC	48.0000
7	99,999,999.00	HUR000000000100376373	Nationally Certified CAS interpreter with less than 10 years experience.	45.0000
8	99,999,999.00	HUR000000000100376374	Nationally Certified > 10 years and < 15 years	50.0000
9	99,999,999.00	HUR000000000100376375	Nationally Certified > 15 years	55.0000
10	99,999,999.00	HUR000000000100376376	Video Remote Interpreter American Sign Language	60.0000
11	99,999,999.00	HUR000000000100376377	Audio Description and Captioning	80.0000
12	99,999,999.00	HUR000000000100376378	CART (Court Reporting School Certificate) or 180 words per minute literary, 225 words per minute Q and A or Speech to text	55.0000
13	99,999,999.00	HUR000000000100376379	CART (NCRA CRR -Certified Real time Reporter or CCP - Certified CART Provider)/National Speech to Text	90.0000
14	99,999,999.00	HUR000000000100376380	CART non certified	40.0000
15	99,999,999.00	MI 000000000100376381	Mileage for interpreter traveling 50+ miles to scheduled apt.	0.3900

Quantity Purchase Agreement With The State Of Indiana

Qty Purchase Agreement QPA Number		Page
0000000000000000000050144		3 of 3
Requisition Nbr.:	Interpretation Services	
Effective Date:	01/08/2021	
Expiration Date:	02/01/2023	
Agency Number:		
Facility:	ASA 20-1311	
Vendor ID:	0000004623	
Vendor Telephone Nbr:	317-897-9763	
Name Of Contact Pers:		
Contact Email:	SWARD@EASTERSEALSCROSS	
FAX Number:	317-897-9763	

Vendor: CROSSROADS REHABILITATION CTR
Remit to: 4740 KINGSWAY DR
INDIANAPOLIS IN 46205

Name and Address of Vendor: CROSSROADS REHABILITATION CTR
INARF/CROSSROADS REHAB INC
615 N. ALABAMA STREET
SUITE 410
INDIANAPOLIS IN 46104

In accordance with your bid, submitted in response to the above referenced solicitation, the Vendor agrees that the Indiana Department of Administration, Procurement Division, has the option to purchase the items listed below under the terms of this agreement.


The Vendor agrees to charge these prices for any products ordered on any QPA release received after the expiration of the QPA but issued prior to the expiration date.


The quantity listed herein is an estimate of the requirements. The state may order substantially more or substantially less pursuant to the terms of this agreement.


Orders are to be delivered only upon receipt of properly approved Quantity Purchase Award Release.


Line Number	Quantity	UNIT	Article and Description	Unit Price
			The following UN/CEFACT Unit of Measure Common Codes are used in this document:	
		HUR	Hour	
		MI	Mile	


Signature of Purchasing Officer	Typed Name		Signature Of Approval Office Of the State Attorney General	
	Date Signed		Typed Name	Date Signed
Authorized Signature	Indiana Department Of Administration Procurement Division 402 West Washington Street, Rm W468 Indianapolis, Indiana 46204 Telephone: (317) 232-3150			

 An official website of the Indiana State Government

 Accessibility Settings

 Language Translation

 Governor Eric J. Holcomb


Indiana Department of Workforce Development

[Home](#)
[About DWD](#)
[Job Seekers](#)
[Businesses](#)
[Training Services](#)
[Indiana Unemployment](#)
[Partners & Regions](#)
[Data](#)
[Newsroom](#)

Contact Options

If you would like more info on the Indiana Department of Workforce and our programs and services, please contact us using one of the following methods. You can also type your question in the **search field** located at the **top right of this page**.

WorkOne Virtual Services


Book an Appointment with a WorkOne Representative.

Beware of Fraudulent Messages

Experiencing fraud related issues? Report it here.

Unemployment Insurance Information

Call the Unemployment Insurance (UI) Division.




Phone: [1-800-891-6499](tel:1-800-891-6499)

Benefit Call Center Hours Monday-Friday: 8:00 AM to 4:30 PM Eastern Saturday - Sunday: Closed	Tax Call Center Hours Monday-Friday: 8:00 AM to 4:30 PM Eastern Saturday - Sunday: Closed
--	--

Interpretation available upon request - Interpretación disponible a pedido

TDD/TTY: The TDD/TTY line is restricted to calls for the deaf and hard of hearing. No calls will be taken on this line unless the caller requires such service due to being deaf or hard of hearing. Phone: [317-232-7560](tel:317-232-7560)

Email us the Unemployment Insurance (UI) Division.




AskUIContactCenter@dwd.IN.gov

**** Please include the following details in your email****

- Are you a claimant or an employer?
- Your last name
- The last 4 digits of your social security number or employer account number
- Zip code of residence

General Contact Methods.



Mailing Address:
 Indiana Department of Workforce Development
 Indiana Government Center
 South 10 North Senate Avenue
 Indianapolis, IN 46204

Contact the Commissioner:
[AskDWDCommissioner](#)



Please enter the following information below and click the Next button when you are finished.

Documentation 2.12

CURRENT LAYOUT

* Indicates required fields. For help click the question mark icon.

Ethnic Origin

- * Are you of Hispanic or Latino heritage?

☐ Yes ☐ No ☐ I do not wish to answer.
- * Race - Please check all that apply:

☐ African American/Black

☐ American Indian/Alaskan Native

☐ Asian

☐ Hawaiian/Other Pacific Islander

☐ White

☐ I do not wish to answer.

Language

- Do you primarily speak a language other than English?

☒ Yes ☐ No
- * What is that language?

None Selected
- * How well do you speak that language?

None Selected
- * Do you require English language assistance?

☐ Yes ☐ No
- * How well do you speak English?

None Selected

<< Back

Next >>

Return to Home



Please enter the following information below and click the Next button when you are finished.

* Indicates required fields.

NEW LAYOUT

🔗 For help click the question mark icon.

Ethnic Origin

- * Are you of Hispanic or Latino heritage? ☐ Yes ☐ No ☐ I do not wish to answer.
- * Race - Please check all that apply:

☐ African American/Black

☐ American Indian/Alaskan Native

☐ Asian

☐ Hawaiian/Other Pacific Islander

☐ White

☐ I do not wish to answer.

Language

- Do you primarily speak a language other than English? ☒ Yes ☐ No
- * What is that language?

None Selected ▾
- * Do you require language assistance? ☐ Yes ☐ No

This removes the questions about how well they speak their preferred language and how well they speak English.


It also changes the question to just ask if they need "language assistance" instead of "English language assistance."

<< Back

Next >>

Return to Home

Rapid Response Orientation Presentation Excerpt



EQUAL OPPORTUNITY

WorkOne is an Equal Opportunity Program/Employer
Auxiliary aids and services are available upon request

If you think that you have been subjected to discrimination you may file a complaint within 180 days from the date of the alleged violation.

File a complaint to:
This is where the Local EO Officer enters their NAME and contact information

Or Send Complaint To:

Director, Civil Rights Center (CRC)
U.S. Department of Labor
200 Constitution Avenue NW
Room N- 4123, Washington, DC 20210

Element 3: Review Assurances, Job Training Plans, Contracts, and Policies and Procedures

[29 CFR 38.25 through 38.27 and 38.54]

Indiana ensures compliance with 29 CFR Part 38.25 and 38.54 regarding the review of assurances, job training plans, contracts, policies and procedures through various means. This includes requiring that all WIOA Title I grant applicants and recipients agree to the EO assurance language prescribed by Part 38.25⁴⁵ and are able to provide programmatic and physical accessibility for individuals with disabilities. Further, it encompasses the review of job training plans, contracts, policies and procedures at the state and local level to ensure they are nondiscriminatory and include the required assurances.

Assurance Language

Indiana's WIOA State Strategic Workforce Plan (State Plan) offers an assurance that appropriate action has been taken to comply with Section 188.⁴⁶ Further, DWD Policy 2016-09 requires the inclusion of the EO assurance language in all contracts, grants, cooperative agreements, applications, or other arrangements.

DWD Policy, in compliance with Part 38.25(a)(2), informs all recipients that this nondiscrimination assurance is considered incorporated by operation of law in the grant, cooperative agreement, contract, or other arrangement whereby Federal financial assistance under WIOA Title I is made available, whether or not it is physically incorporated in such document and whether or not there is a written agreement between the DOL and the recipient, or between the DOL and the Governor, between the Governor and the recipient, or between recipients.

The assurance also may be incorporated by reference in such grants, cooperative agreements, contracts, or other arrangements. In lieu of including the assurance language in its entirety for smaller contracts or agreements, DWD Policy has provided that the following reference to the language may be used:

"The equal opportunity and nondiscrimination assurances at 29 CFR Part 38.25 apply to this contract/ agreement."

The LWDA grant agreements for WIOA Title I funds reflect the following:⁴⁷

"The parties to this Grant Agreement assure that each will fully comply with the nondiscrimination and equal opportunity provisions of Section 188 of WIOA and its implementing regulations."

⁴⁵ Documentation 3.1: Required Assurance Language from DWD Policy 2016-09

⁴⁶ https://www.in.gov/gwc/files/IN-WIOA-Combined-Plan_3.31.22.pdf; Documentation 3.2: Excerpt from Indiana's WIOA State Plan

⁴⁷ Documentation 3.3: Grant Boilerplate Language Excerpt

The grant agreements also require the parties to assure the following is provided in the One-Stop delivery system:

- Facilities and programs are architecturally and programmatically accessible.
- Reasonable accommodations for individuals with disabilities.
- Cost allocation method for making reasonable accommodations.

The State EO Officer is currently working with internal partners in order to strengthen relationships, such as the program leads for the Eligible Training Provider List (ETPL), Unemployment Insurance, and Adult Education to ensure that the required assurance is included when/where applicable.

Assurance Reviews

DWD's Compliance and Policy Workforce Division monitoring team periodically review each LWDA's contracts, policies, and other agreements to ensure they are nondiscriminatory and that they include all required EO assurances. The monitoring team and EO staff provide technical assistance as needed and conduct periodic desk audits to monitor each LWDA's compliance with EO and nondiscrimination requirements. DWD's EO Monitoring Tool outlines this process.⁴⁸ Some elements monitored include structural accessibility, parking for individuals with disabilities, designated restrooms, appropriate signage, program accessibility, and effective communication for persons with disabilities and LEP individuals. For further detail on the monitoring process, please refer to Element 7.

DWD Policy 2020-09, "One-Stop American Job Center Certification" outlines Indiana's One-Stop Certification process.⁴⁹ In accordance with this policy, each LWDA completed a certification tool with verifications for EO provisions, including proper EO awareness and accessibility.⁵⁰ One-Stop Certifications are again due from each LWDA Spring of 2023.

⁴⁸ For more information, see Element 7 and Documentation 7.8

⁴⁹ Documentation 3.4: DWD Policy 2016-10: One-Stop Center Certification

⁵⁰ Documentation 3.5: Excerpt from One-Stop Certification Tool

Element 3 Documentation

Documentation 3.1: Required Assurance Language

Documentation 3.2: Excerpt from Indiana's WIOA State Plan

Documentation 3.3: Grant Boilerplate Language Excerpt

Documentation 3.4: DWD Policy 2016-10: One-Stop Center Certification

Documentation 3.5: Excerpt from One-Stop Certification Tool

Attachment B

Required Assurance Language (38.25)

(1) Each application for financial assistance, under Title I of WIOA, as defined in § 38.4, must include the following assurance:

- (i) As a condition to the award of financial assistance from the Department of Labor under Title I of WIOA, the grant applicant assures that it has the ability to comply with the nondiscrimination and equal opportunity provisions of the following laws and will remain in compliance for the duration of the award of federal financial assistance:
 - (A) Section 188 of the Workforce Innovation and Opportunity Act (WIOA), which prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or against beneficiaries on the basis of either citizenship status or participation in any WIOA Title I financially assisted program or activity;
 - (B) Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the bases of race, color and national origin;
 - (C) Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;
 - (D) The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age; and
 - (E) Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs.
- (ii) The grant applicant also assures that, as a recipient of WIOA Title I financial assistance, it will comply with 29 CFR part 38 and all other regulations implementing the laws listed above. This assurance applies to the grant applicant's operation of the WIOA Title I-financially assisted program or activity, and to all agreements the grant applicant makes to carry out the WIOA Title I-financially assisted program or activity. The grant applicant understands that the United States has the right to seek judicial enforcement of this assurance.

program DVOP specialist is available in DWD Policy 2019-03, which can be found at <https://www.in.gov/dwd/compliance-policy/policy/active/>.

8. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WITH DISABILITIES

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

Indiana's WIOA state-level Equal Opportunity (EO) Officer, appointed by the Governor, works within DWD's Compliance and Policy Division with 100% time commitment to equal opportunity and nondiscrimination in workforce programs. One of the primary duties of the State EO Officer is to develop and implement the federally mandated Nondiscrimination Plan (NDP). The NDP is a statewide plan for ensuring equal opportunity and nondiscrimination in the availability, access, and service delivery of WIOA Title I funded programs and services. The NDP must be updated and resubmitted to the US DOL Civil Rights Center (CRC) every two years, with Indiana's latest submission in September 2020. Indiana's 2020-2022 NDP provides detail on physical and programmatic accessibility and can be found at: https://www.in.gov/dwd/files/State_of_Indiana_Nondiscrimination_Plan_2020.pdf.

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

Together, the State and Local EO Officers implement the NDP and continually review policies and practices. DWD developed DWD Policy 2016-09, *Equal Opportunity and Nondiscrimination Guidance Letter* (see https://www.in.gov/dwd/files/activepolicies/2016-09-P_EO_Nondiscrimination_Guidance.pdf) outlining the major provisions of section 188 and 29 CFR 38. The agency has designed several training modules for Local EO Officers and staff, which can be found at <https://www.in.gov/dwd/compliance-policy/equal-opportunity/training-resources>. Training modules relevant to physical and programmatic accessibility include, for example, the *EO 101* and *Compliance with Disability Nondiscrimination Requirements* modules.

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

The Equal Opportunity tagline is included on all external marketing and communication materials to allow people who are deaf and hard of hearing to make calls to each other, and with the assistance of the relay systems, users can communicate with people who do not have TTY systems. DWD and partner staff are knowledgeable on more advanced systems such as Video

Relay Services and Video Remote Interpreting. The following sample tagline is below, and when necessary is translated into other languages:

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

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

Additionally, DWD will continue to enhance the Job Seekers with Disabilities website (<https://www.in.gov/dwd/job-seekers/job-seekers-with-disabilities/>) to include resources for both job seekers and employers. DWD will work to build new partnerships and enhance existing partnerships, such as with the Governor's Council for People with Disabilities and FSSA/VR.

Within the WorkOne centers, staff have been and will be further trained to follow established procedures to ensure inclusion and compliance. Starting with intake, staff is trained to ask every constituent if s/he require accommodations. Customer and WorkOne office staff orientations include a discussion of Equal Opportunity (EO) and the right to file a complaint. Following orientation, services should be reviewed with the constituent by determining the client's eligibility and need for services in an integrated setting. Ongoing training will need to occur to educate staff on the services, funding, and the resources available to determine when it is appropriate to refer to partner agencies and co-enroll individuals in multiple programs, such as Vocational Rehabilitation, to access a greater service array to meet the individual's needs. Agency partners will seek to coordinate efforts and leverage funding between partner agencies to meet the employment and training needs of the customer.

Staff will also be trained to use multiple resources and tools to ensure accessibility to services. One such resource that staff will be encouraged to use is the Guidepost for Success, which is a set of key educational and intervention strategies for youth, including those with disabilities. Additionally, one-stop assessments, Individual Education Program (IEPs), and Academic and Career Planning (ACPs) tools will continue to be utilized to identify career paths, barriers to employment, training or service needs, and employability skills. These assessments will also assist with identifying hidden disabilities and the potential need for accommodations.

All Comprehensive and Affiliate WorkOne offices completed the One Stop Certifications as of March of 2021, in accordance with DWD's One Stop Certification policy, which can be found on DWD's policy website at https://www.in.gov/dwd/compliance-policy/policy/active/_Local. EO Officers conduct accessibility compliance surveys of WorkOne offices checking the accessibility of various areas, such as parking, accessible routes, ramps, entrances and doors, signage, and restrooms. Accessibility compliance surveys are also conducted upon new office openings/moves and physical accessibility is a regular component of annual monitoring by DWD's Compliance staff.

Physical Accessibility: All Comprehensive and Affiliate WorkOne offices completed the One Stop Certifications as of March of 2021, in accordance with DWD's One Stop Certification policy, which can be found on DWD's policy website at https://www.in.gov/dwd/compliance-policy/policy/active/_Local. EO Officers conduct accessibility compliance surveys of WorkOne offices checking the accessibility of various areas, such as parking, accessible routes, ramps, entrances and doors, signage, and restrooms. Accessibility compliance surveys are also conducted upon new office openings/moves and physical accessibility is a regular component of annual monitoring by DWD's Compliance staff.

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

9. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WHO ARE ENGLISH LANGUAGE LEARNERS

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English language learners, such as through established procedures, staff training, resources, and other materials.

In order to help all clients better understand how to receive benefits and interact with the WorkOne system, DWD and its partners work to provide meaningful access to programs and activities by continually reviewing policy and practices to support limited English proficient individuals. DWD developed DWD Policy 2016-09, *Equal Opportunity and Nondiscrimination Guidance Letter* (see https://www.in.gov/dwd/files/3511/2016-09-P_EO_Nondiscrimination_Guidance.pdf) outlining the major provisions of section 188 and 29 CFR 38 and has designed several training modules for Local EO Officers and staff, which can be found at <https://www.in.gov/dwd/compliance-policy/equal-opportunity/training-resources/>.

Training modules relevant to EL services include, for example, the *Notice and Communication* and *Affirmative Outreach* modules. The NDP also covers EL service efforts (see https://www.in.gov/dwd/files/State_of_Indiana_Nondiscrimination_Plan_2020).

WorkOne customers have access to interpreter services through an Indiana Department of Administration (IDOA) contracted language interpretation provider. The contract allows for in person interpretation of dozens of the primary languages spoken in Indiana. The contract also allows for phone interpretation services for additional languages not provided for by in-person interpretation. In addition, Google Translate is now on the DWD website and on the Indiana Career Connect system.

The required "Equal Opportunity is the Law" notice (the EO Notice) is available in both English and Spanish, as Spanish is the most prominent non-English language throughout the state. Copies of the EO Notice in both languages are typically posted in all WorkOne offices. The EO tagline, as well as copies of the EO Notice and additional state and federal posters, such as the Unemployment Insurance and Migrant and Seasonal Agricultural Worker Protection, are provided in English and Spanish on DWD's website. Additionally, DWD recently made the Unemployment Insurance handbook available in Spanish. This handbook is a great resource which explains the process for applying for Unemployment Insurance and what to expect when filing.

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

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

Sample language for the Babel notice is below in English:

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

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

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

IV. COORDINATION WITH STATE PLAN PROGRAMS

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

Throughout the development of the Combined Plan, the state has used a variety of methods to ensure coordination across agencies that administer programs and activities in our Combined Plan. State agencies, non-profit and private partners, and the general public have provided input throughout the Plan development process, all committed to a shared goal of creating a more integrated and effective workforce system that works for all Hoosiers. By having the Governor's Workforce Cabinet (GWC) spearhead efforts on the plan, the GWC has been able to bring together the 7 state agencies represented on the Cabinet to ensure greater collaboration on the State Workforce Plan.

Last summer, GWC staff held a meeting with the Agency Heads of those 7 state agencies to gather initial support from each agency for the state's first Combined Plan and chart a plan of action towards submission of the Plan in the spring of 2020.

A Listening Tour was conducted by GWC staff in the fall that included a stop in each of Indiana's 12 workforce regions. The Listening Tour stops were attended by staff from the core programs, required one-stop partner programs, other programs and activities included in the Combined Plan, and other interested stakeholders. Some of the common themes heard during the Listening Tour included the need to co-locate more services to reduce barriers for Hoosiers and the importance of considering common barriers, such as childcare and transportation, when trying to reach individuals with education and training services. Additionally, the importance of

Grant Boilerplate Language Excerpt

Failure to provide insurance as required in the Grant may be deemed a material breach of contract entitling the State to immediately terminate this Grant.

16. Licensing Standards

The Grantee, its employees and subgrantees shall comply with all applicable licensing standards, certification standards, accrediting standards and any other laws, rules or regulations governing services to be provided by the Grantee pursuant to this Grant Agreement. The State will not pay the Grantee for any services performed when the Grantee, its employees or subgrantees are not in compliance with such applicable standards, laws, rules or regulations. If any license, certification or accreditation expires or is revoked, or any disciplinary action is taken against an applicable license, certification or accreditation, the Grantee shall notify the State immediately and the State, at its option, may immediately terminate this Grant Agreement.

17. Lobbying Activities

- A. Pursuant to 31 USC §1352, and any regulations promulgated there under, the Grantee hereby assures and certifies, and will require any subcontractor or subgrantee to assure and certify, that no federally appropriated funds have been paid, or will be paid, to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress, in conjunction with the awarding of any federal grant, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan or cooperative agreement.
- B. If any funds other than federally appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with this grant, the Grantee and any subcontractor shall complete and submit "Standard Form LLL" ("Disclosure Form to Report Lobby").

18. Modification

The parties shall modify or extend this Agreement consistent with applicable law and DWD policy. Such modification or extension shall be made by mutual written agreement of the parties and subsequent approval by all appropriate state officials or their designees.

19. Monitoring and Compliance

The State shall monitor the Grantee's compliance with the terms and conditions of the Grant Agreement including all applicable statutes, regulations, directives and mandates. The Grantee shall provide the State reasonable and adequate opportunity to conduct this monitoring, including providing the opportunity to review and audit all relevant documents, forms, reports or any other records at any time during the term of this Grant Agreement and after the Expiration Date as may be reasonably necessary to monitor compliance with this Grant Agreement. The Grantee will be responsible for on-site monitoring of any sub-recipient.

20. Nondiscrimination

Pursuant to the Indiana Civil Rights Law, specifically including IC 22-9-1-10, and in keeping with the purposes of the federal Civil Rights Act of 1964, the Age Discrimination in Employment Act, and the Americans with Disabilities Act, the Grantee covenants that it shall not discriminate against any employee or applicant for employment relating to the Grant with respect to the hire,

tenure, terms, conditions or privileges of employment or any matter directly or indirectly related to employment because of the employee or applicant's : race, color, national origin, religion, sex, age, disability, ancestry, status as a veteran, or any other characteristic protected by federal, state, or local law ("Protected Characteristics"). Furthermore, the Grantee certifies compliance with applicable federal laws, regulations, and executive orders prohibiting discrimination based on the Protected Characteristics in the provision of services.

The Grantee understands that the State is a recipient of federal funds, and therefore, where applicable, the Grantee and any subgrantees agree to comply with requisite affirmative action requirements, including reporting, pursuant to 41 CFR §60-1.1 et seq., as amended, and Section 202 of Executive Order 11246.

- A. **Equal Opportunity Assurances:** The parties to this Grant Agreement assure that each will fully comply with the nondiscrimination and equal opportunity provisions of Section 188 of WIOA and its implementing regulations. These regulations prohibit discrimination because of race, color, religion, sex, national origin, age, disability, or political affiliation or belief in both participation and employment. In the case of participants only, it prohibits discrimination based on citizenship, or his or her participation in any WIOA Title I- financially assisted program or activity.
- B. **Discrimination Complaint Procedures:** The parties to this Grant Agreement will assure those complaints alleging discrimination on any of the above bases will be processed in accordance with applicable WIOA regulations and DWD policy 2016-09, as well as any subsequent DWD policy which rescinds and replaces these, developed pursuant to this section and approved by the U.S. Department of Labor's Civil Rights Center.
- C. **Accessibility and Reasonable Accommodation:** Pursuant to applicable WIOA regulations, the parties to this Grant Agreement will assure that the following is provided in the One-Stop delivery systems:
 - 1) Facilities and programs which are architecturally and programmatically accessible;
 - 2) Reasonable accommodations for individuals with disabilities;
 - 3) Cost allocation method for making reasonable accommodations (i.e., shared or paid by one entity).
- D. **Obligation to Provide Notice:** The parties to this Grant Agreement will provide ongoing and continuing notification that it does not discriminate on any of the prohibited basis in accordance with applicable regulations for Section 188 of WIOA.

21. Notice to Parties

Whenever any notice, statement or other communication is required under this Grant, it shall be sent by first class mail or via an established courier / delivery service to the following addresses, unless otherwise specifically advised.

Notices to the State shall be sent to:

Indiana Department of Workforce Development
ATTN: Commissioner
10 North Senate Ave., IGCS, 3rd Floor
Indianapolis, IN 46204

Notices to the Grantee shall be sent to:

Linda Woloshansky, President
Center of Workforce Innovations, Inc.
2804 Boilermaker Court, Suite E
Valparaiso, IN 46383



Eric J. Holcomb, *Governor*
 Frederick D. Payne, *Commissioner*

To: Indiana's Workforce Investment System

From: Indiana Department of Workforce Development (DWD)

Date: December 18, 2020

Subject: DWD Policy 2020-09
 One-Stop American Job Center Certification

Purpose

To communicate the process and criteria for evaluating and certifying Indiana's comprehensive and affiliate One-Stop American Job Centers (AJCs) pursuant to the Workforce Innovation and Opportunity Act (WIOA).

Rescission

- DWD Policy 2016-10 - One-Stop Center Certification

References

- WIOA Sec. 121, 134, 188
- 20 CFR 678.300 – 320, 678.400 - 678.415, 678.430, 678.800, 678.900 and 680.200
- 2 CFR parts 200 and 2900
- 29 CFR part 38
- TEGL 16-16 One-Stop Operations Guidance for the American Job Center Network

Content

Background

Title I of WIOA requires the State Board (Governor's Workforce Cabinet or GWC), in consultation with Regional Chief Elected Officials (RCEOs) and Local Workforce Development Boards (WDBs), to establish objective criteria and procedures for the local WDBs to evaluate and certify the comprehensive and affiliate one-stop centers¹ located within its Local Workforce Development Area (LWDA). The evaluation and certification process examines effectiveness (including customer satisfaction), physical and programmatic accessibility, and continuous improvement. Each one-stop center must be certified to be designated as a "one-stop center" to receive funding. The certification of one-stop centers is essential in setting a minimum level of quality and consistency of services in the workforce system across the state.

¹ Comprehensive and Affiliate one-stop centers will be collectively referred to throughout this policy as "one-stop center(s)".

Roles and Responsibilities

DWD, on behalf of the GWC is responsible for oversight of the one-stop center certification process. In consultation with the GWC, DWD must see that the one-stop certification criteria are reviewed and updated every two years as part of the review and modification of the WIOA State Plan. DWD conducts the certification of one-stop centers when the local board is the one-stop operator in a LWDA. The WDBs are responsible for oversight of the one-stop center certification process at the local level and for the appointment of a certification team to conduct the one-stop certification reviews for each one-stop center in its LWDA (unless the local WDB is also the one-stop operator, discussed more fully below). The local WDB must use the *Indiana One-Stop Center Certification Review Form* (Attachment A) and the corresponding criteria established by the State.

The local WDB may set higher standards for service coordination beyond those identified in the one-stop certification criteria established by the State. However, the additional criteria must be clearly identified in an addendum to the *Indiana One-Stop Center Certification Review Form*.

Definitions

Comprehensive One-Stop Center

WIOA requires at least one comprehensive physical center in each LWDA. A comprehensive one-stop center is a physical location where job seeker and employer customers can access the programs, services, and activities of all required one-stop partners. A comprehensive one-stop center must have at least one WIOA title I staff person physically present.

The comprehensive one-stop center must provide:

- Career services described in WIOA regulations 20 CFR § 678.430.
- Access to training services described in WIOA regulations 20 CFR § 680.200;
- Access to any employment and training activities carried out under sec. 134(d) of WIOA;
- Access to programs and activities carried out by one-stop partners listed in WIOA regulations 20 CFR §678.400 through 678.410, including the Employment Service program authorized under the Wagner-Peyser Act, as amended by WIOA title III (Wagner-Peyser Act Employment Service program); and
- Workforce and labor market information.

Access to partner programs 20 CFR §678.305 (d) is defined as:

- Having a program staff member physically present at the one-stop center;
- Having a staff member from a different partner program physically present at the one-stop center appropriately trained to provide information to customers about the programs, services, and activities available through partner programs; or
- Making available a direct linkage through technology to program staff who can provide meaningful information or services.
 - A “direct linkage” means providing direct connection at the one-stop center, within a reasonable time, by phone or through a real-time Web-based communication to a program staff member who can provide program information or services to the customer.
 - A “direct linkage” cannot exclusively be providing a phone number or computer Web site or providing information, pamphlets, or materials.

All comprehensive one-stop centers must be physically and programmatically accessible to individuals with disabilities, as described in 29 CFR part 38, the implementing regulations of WIOA sec. 188.

Affiliate One-Stop Center

WIOA also allows for affiliate one-stop centers in each LWDA. An affiliated site, or affiliate one-stop center, is a site that makes available to job seeker and employer customers one or more of the one-stop partners' programs, services, and activities. An affiliated site does not need to provide access to every required one-stop partner program. The frequency of program staff's physical presence in the affiliated site will be determined at the local level. Affiliated sites are access points in addition to the comprehensive one-stop center(s) in each local area. If used by local areas as a part of the service delivery strategy, affiliate sites must be implemented in a manner that supplements and enhances customer access to services. Wagner-Peyser employment services cannot be provided as a stand-alone service at an affiliated site. In addition to the above requirements for an affiliate center, affiliate centers means physical buildings owned and/or operated by the local WDB and its designees, that has combined program staff present more than 50% of the time the center is open.

All affiliated sites must be physically and programmatically accessible to individuals with disabilities, as described in 29 CFR part 38, the implementing regulations of WIOA sec. 188.

Review Process

Coronavirus

Due to the ongoing dynamic situation with the coronavirus pandemic, caution should be used and Center for Disease Control (CDC) guidance on social distancing, masks, risk factors and other important information should be taken into account when planning and executing certification visits and interviews. Center certification teams are encouraged to employ flexible means to assess the center requirements. Examples include, but are not limited to, minimizing the number of team members who go to the physical centers, using phone, picture or video technology to accomplish review requirements. One-stop certification reviews do not have to be conducted on site for Program Year (PY) 2020.

Certification Teams

If the local WDB does not serve in the role of the one-stop operator for its LWDA, the local WDB has the discretion to appoint a team of three or more individuals to conduct the one-stop certification review, so long as there are no conflicts of interest. One of the three individuals appointed to serve on the certification team must be a local WDB member. The local WDB shall notify the RCEO of the certification team selection.

If the local WDB does serve in the role of one-stop operator for a LWDA, DWD shall be responsible for conducting the one-stop center certification for each one-stop center in that LWDA. DWD will appoint a review team of three or more state staff to conduct the certification and ensure there are no conflicts of interest. The individuals selected to be on either the local WDB or DWD certification team must be able to conduct an independent and objective evaluation of the one-stop centers and make a recommendation to the local WDB (if local WDB certification team) or the GWC (if DWD certification team). One individual on the certification team must serve as the "team lead" for contact purposes.

Certification Process

The certification team shall contact each center to schedule a time to conduct the one-stop certification review. The certification team shall conduct staff interviews with applicable staff². Interviewees shall include the Center Manager, the local Equal Opportunity Officer, and a random sample of at least 20 percent of the frontline (state and partner) staff at the one-stop center to determine their level of knowledge pertaining to the following:

- WIOA partner programs/services;
- Local initiatives;
- One-stop center policies and procedures;
- Staff roles and contributions to performance; and
- Awareness of accessibility requirements and available assistive technologies.

The certification team shall review all necessary documentation including the following:

- The local MOU;
- Business and/or Local Plan;
- Marketing and other printed materials;
- Training schedules;
- Customer feedback reports;
- Customer employment plans/case notes;
- Local policies, procedures, manuals; and
- Complaints and compliance findings;

Certification teams shall use the *Indiana One-Stop Center Certification Review Form* provided in Attachment A, which includes a *Determination* sheet, for each center reviewed. A completed form for each One-Stop Center must be submitted to the DWD Policy Department and the local WDB (if a local WDB certification team conducted the review) or the GWC (if a DWD certification team conducted the review) for each center within thirty (30) days of conducting the one-stop center certification review.

Non-Certification

In the event of non-certification, an action plan and timetable will be prepared by DWD in consultation with the one-stop operator, to bring the one-stop center into compliance and a date for a follow-up review within ninety (90) days from the determination date will be set.

If a one-stop center fails to achieve certification after the ninety (90) day re-evaluation review, the center shall be deemed probationary, and DWD will notify the RCEO. The local WDB shall have six months to bring a probationary one-stop center into compliance (infrastructure cost-funding will not be impacted during this time frame). If a local WDB fails to certify any one-stop center after the six month probationary period, that one-stop center will not be eligible for infrastructure-cost funding for the ensuing program year.³ Local WDBs and the GWC, if the WDB is also the one-stop operator, may consider additional ramifications for failing one-stop certifications in their one-stop operator contracts.

² An affiliate center will likely not have all the identified staff for the purpose of staff interviews. The certification team should interview the available staff in those centers.

³ WIOA Sec. 121(g)(4)

Submitting Documentation

Documentation regarding the one-stop center certification should be emailed to policy@dwd.in.gov.

Action

All comprehensive and affiliate one-stop center reviews shall be completed no later than March 31, 2021. Once certified, the certification status will remain in effect for three years. Future certifications shall be completed no later than March 31st immediately preceding the beginning of the third program year (i.e. March 31, 2024 for the next round of certifications).

Effective Date

Immediately.

Ending Date

Upon rescission.

Attachments

Attachment A - *Indiana One-Stop Center Certification Review Form*

Additional Information

Questions regarding the content of this publication should be directed to DWD Policy: policy@dwd.in.gov.

Standard 7 - Equal Opportunity Awareness

	The local Equal Opportunity Officer periodically reviews policies and procedures regarding accessibility and equal opportunity and provides staff training and updates.	Meets	Does Not Meet	In Progress
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.1	<i>Verify the last time the EO officer reviewed/ updated policies and procedures. Have staff received training? How often is training provided? Are new employees trained?</i>			
	Comments: Click here to enter text.			
	The required Equal Opportunity tagline is included on all documents and web pages.	Meets	Does Not Meet	In Progress
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.2	<i>Review flyers, forms, brochures, handouts and websites provided to all customers.</i>			
	Comments: Click here to enter text.			
	All Equal Opportunity signage is posted prominently, in reasonable numbers and places, in available and conspicuous physical locations in the one-stop.	Meets	Does Not Meet	In Progress
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.3	<i>Verify through observation.</i>			
	Comments: Click here to enter text.			
	There is a process in place for customers to file Equal Opportunity complaints/ grievances and a process for addressing these complaints/grievances when they are filed.	Meets	Does Not Meet	In Progress
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.4	<i>Review procedural documents pertaining to EO complaints/grievances.</i>			
	Comments: Click here to enter text.			

Standard 8 - Physical Accessibility

8.1	Center physical accessibility is in compliance with all accessibility requirements under Federal Law. The one-stop center meets the physical accessibility requirements under WIOA Sec. 188, set forth in 29 CFR 38.	Meets	Does Not Meet	In Progress
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Verify with Local EO Officer and State EO Officer.			
	Comments: Click here to enter text.			
8.2	Staff and program partners demonstrate they know how to use adaptive and assistive technologies and are aware of the available resources.	Meets	Does Not Meet	In Progress
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Verify through staff interviews and observation.			
	Comments: Click here to enter text.			
8.3	A written policy explains how required partners in the one-stop center make reasonable accommodations and includes procedures for handling requests for accommodations.	Meets	Does Not Meet	In Progress
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Review reasonable accommodations policy and/or procedures.			
	Comments: Click here to enter text.			

8.4	Workshops are accessible to all customers whether provided in person or virtually. The one-stop center provides reasonable accommodations to ensure equal access.	Meets	Does Not Meet	In Progress
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Verify through observation and staff interviews to ensure workshops are accessible and reasonable accommodations are provided as needed. Comments: Click here to enter text.			
8.5	The one-stop center utilizes available resources, such as Vocational Rehabilitation Services, to ensure accessibility.	Meets	Does Not Meet	In Progress
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Verify through staff interviews and observation. Do staff know when to make appropriate referrals to agencies such as VR, when needed? Are staff aware of available interpreter services/ technology for limited English proficient (LEP) individuals? Comments: Click here to enter text.			

Element 4: Affirmative Outreach

[29 CFR 38.40]

Recipients must ensure equal access to programs and activities by making reasonable efforts to include members of the various groups protected by Section 188, including but not limited to persons of different sexes, various racial and ethnic/national origin groups, various religions, individuals with limited English proficiency, individuals with disabilities, and individuals in different age groups.⁵¹ The DWD EO Policy⁵² communicates this requirement and provides the following examples of outreach efforts:

- Targeting specific populations in advertisements
- Sending information to schools or community service groups
- Consulting with community service groups on ways to improve outreach and service

Demographic Assessment

Local demographic information assists the LWDAs in their diversity planning and service development. Hoosiers by the Numbers⁵³ provides public data related to labor force, industry, occupations, unemployment, demographics, and job growth and serves as the official source for labor market information for the state of Indiana. Users can pull demographic data (e.g., population data by age, race, ethnicity, gender, etc.) by region to assist in determining targeted populations for outreach efforts.⁵⁴ Local demographic information can also be obtained using the United States Census Bureau data.⁵⁵ Data includes demographics as they relate to unemployment, labor force participation, and total population for all counties in Indiana. The LWDAs have been trained on obtaining this data and doing statistical analyses using this data and/or local office program data.⁵⁶ The State EO Officer has implemented using this data in annual monitoring.⁵⁷

General Outreach Efforts

DWD and its WorkOne Centers strive to serve a broad range of customers through outreach and other utilization of partner resources. Such efforts include community outreach, job fairs, job information centers, as well as posters, fliers, and brochures promoting WIOA Title I programs and activities. WorkOne Centers participate in college/school career days, job fairs and on-site dislocated worker Rapid Response services in order to disseminate information on re-employment services and career opportunities for the general community and, more

⁵¹ 29 CFR 38.40

⁵² DWD Policy 2016-09 (see Documentation 1.5)

⁵³ www.hoosierdata.in.gov

⁵⁴ Documentation 4.1: Hoosiers by the Numbers Sample Data

⁵⁵ Documentation 4.2: United States Census Bureau Sample Data

⁵⁶ Documentation 4.3: ICC Demographics Sample Data

⁵⁷ For further details, see Element 7

specifically, for minorities, older workers, veterans and non-veterans with disabilities.⁵⁸

DWD has a Director of Program Diversity to increase the diversity of employers engaged with at the state level, in order to make them aware of relevant programs and opportunities, as well as to promote opportunities for the clients served by DWD. Just a few initiatives are listed below:

- Next Level Jobs Employer Training Grant (ETG) - Increased participation in Minority Business Enterprises (MBE), Women Business Enterprises (WBE) and Veteran Business Enterprises
- Equity and Inclusion - Launched diversity initiative: Confronting bias training in unification with Indiana State Personnel department
- Continued connecting and engaging and training by strengthened alliances with strategic partners, e.g., Indiana Civil Rights Commission, Indianapolis Urban League, Indy Black Chamber of Commerce, Indiana Commission for Women, and Indiana Commission on Hispanic/Latino Affairs
- Board member of Indiana Native American Indian Affairs and Indiana Commission on the Social Status of Black Males

Many services are available in multiple formats, including web-based applications for labor exchange, unemployment insurance, and labor market information. Customers can go online to access their specific region's WorkOne website to view information regarding programs, services, training, upcoming job fairs, special events, employment opportunities and unemployment insurance. The websites are available at <http://www.in.gov/dwd/WorkOne/locations.html>.

To ensure affirmative outreach at the local level, many WorkOne Centers have taken action such as:

- Posting signs to inform customers of telephone numbers to call or to see the manager if an accommodation is needed to receive services;
- Identifying individuals and organizations available if assistance is needed to provide services or information in a language other than English;
- Utilizing employees who have skills in languages other than English to assist customers by providing instruction, conveying information, or assisting with completing forms;
- Developing and maintaining contacts with community-based organizations and advocacy groups to ensure the center meets specific needs;
- Coordinating linkages with other federal, state and local agencies serving the various segments of the populations have been developed;
- Participating in community employment events such as job fairs, seminars, and public recruitment for employers to publicize the services of WorkOne Centers; and

⁵⁸ Documentation 4.4 and 4.5: Affirmative Outreach Samples I and II

- Encouraging employers to engage with Indiana’s workforce system via on-site visits with employers and community agencies, participation in job fairs, special recruitment efforts, and employer seminars.

Specific Population Outreach Efforts

The full range of employment and training services delivered through Indiana’s WorkOne system is accessible to, and meets the needs of, specific populations. Such populations include dislocated workers, displaced homemakers, low income individuals, migrant and seasonal farm workers, women, minority individuals, individuals training for non-traditional employment, veterans, public assistance recipients, and individuals with multiple barriers to employment, including older individuals, people with limited English proficiency, and people with disabilities. LWDAs are encouraged to develop innovative outreach methods for these populations and to develop relationships with various local organizations and community service groups that may target certain populations.

Examples of specific population outreach efforts are outlined below.

Limited English Proficient (LEP)

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be classified as LEP. Various services are offered within the twelve LWDAs, including but not limited to, bilingual staff, hand-held translators, English as a Second Language classes, and the use of accessibility stations. Further, the Unemployment Insurance call center employs Spanish-speaking staff to assist customers as needed. At the state level, DWD has an existing contract for Interpreter Services. Although these services are available to all of our WorkOne offices, DWD intends to develop additional guidance regarding service to the LEP population.

Recipients are aware that written materials containing vital information must be translated and readily available for languages spoken by a significant number or portion of the population eligible to be served, or likely to be encountered, and further, reasonable steps must be taken to meet the particularized language needs of any LEP individual, regardless of population size.⁵⁹ Once a recipient becomes aware of an LEP individual’s preferred language, the recipient must convey vital information in that language. Various documents are readily available in Spanish, which is the second most preferred language in Indiana after English.⁶⁰

Unemployment Insurance (UI)

Funds from the UI Equity Grant⁶¹ will be used to create a dedicated position to target, facilitate, advocate, and promote equitable access and outreach for individuals who have historically experienced barriers to the unemployment insurance benefits program.

⁵⁹ 29 CFR 38.9

⁶⁰ Documentation 4.6: Sample of Spanish Materials

⁶¹ See Element 2

Migrant and Seasonal Farm Workers

The Wagner Peyser Act funds the Monitor Advocate System, which was established to ensure MSFWs receive services that are qualitatively equivalent and quantitatively proportionate to services provided to all other job seekers. The structure of the Monitor Advocate System is composed of a State Monitor Advocate (SMA) and an outreach program. The State Monitor Advocate (SMA) provides technical assistance to AJC staff to ensure migrant and seasonal farmworkers have equitable access to job orders, career services, referrals and workforce protections to improve their working and living conditions. The State Workforce Agency Outreach Program conducts outreach to MSFWs who are not being reached through normal intake activities at the local AJCs.

The Outreach Specialists work together with WIOA 167 NFJP Grantee Proteus Inc. and various other MSFW partners through joint outreach. The Outreach Specialists communicate to MSFWs individually or in large groups about the services available at the local one-stop centers, information on the complaint system and an overview of their farmworker rights. At times, Outreach Specialists will provide on-site assistance with WP application for services, and other WP activities, when an MSFW cannot or wishes not to visit the local one-stop center.

The SMA and Outreach Specialists work with crew leaders/contractors and agricultural employers to recruit and fill their local seasonal or temporary job orders. Technical assistance is also provided to crew leaders applying or renewing their farm labor contractor registrations.

Indiana has approximately 187 licensed agricultural labor camps which house about 3,592 migrant farmworkers each season. Also, farm labor contractors continue to utilize non-traditional housing for MSFWs such as, public accommodations like trailer parks, hotel/motel, and apartment complexes. It is estimated that this program year 260 additional migrant workers were housed in non-traditional housing. A total of 3,852 migrant farm workers were living in traditional and non-traditional housing according to DWD's records. Quarterly, and annual reports are provided to DWD and Employment and Training/Department of Labor at the end of every quarter, season, and program year. These reports are composed of all the information gathered from farm workers through outreach efforts, intake and referrals, and the assessment process.

Youth: Jobs for America's Graduates (JAG)

Indiana has implemented a statewide multi-year drop-out prevention and workforce preparation program targeting high school juniors and seniors with barriers to success. An advisory group consisting of a JAG classroom Specialist, high school counselors, school administrators, and workforce program managers select thirty-five (35) to forty-five (45) students per program. Students with academic, socioeconomic, cultural or familial barriers are selected to participate in the program, which is a DOE credited course. Students receive two years of employability skills training, academic remediation, leadership development

training and workforce preparation. Indiana operates several special programs targeted at special populations, including a bi-lingual program in Seymour High School, a program for students who are deaf and hard of hearing at the Indiana School for the Deaf, and other programs working with minority students in some of Indiana's urban school environments.

Disabled Individuals

The special needs of the disabled are addressed in Indiana's WorkOne Centers through various programs and services. Job seekers with disabilities can access information and link to various resources on the Indiana Career Ready (ICR) website⁶² and DWD's website⁶³ for support in preparing for, obtaining and retaining employment. The State and Local EO Officers ensure that all staff are knowledgeable about the importance of meaningful access to services and monitor facilities, programs, and services for physical and programmatic accessibility.

DWD will be conducting outreach to 68,000 individuals who finished high school in the last 10 years with a certificate of completion to alert them to Indiana's continuing education and workforce training resources. The goal of the outreach is to re-engage people and help connect folks, especially those with disabilities, to resources that will support them in achieving a high school equivalency diploma, job training, and beyond. The project offers a vital pathway to informing students who timed out of the K-12 system that there are free resources available to them that can support the advancement of their professional and academic careers.

Jobs for Veterans State Grant (JVSG). Indiana also offers specialized programs and services to disabled veterans. DWD operates the JVSG program, which provides federal funding for hiring dedicated staff to provide individualized career and training-related services to veterans and eligible persons with significant barriers to employment and to assist employers in filling their workforce needs with job-seeking veterans. The JVSG program supports the Disabled Veterans' Outreach Program (DVOP) specialist position and the Local Veterans' Employment Representative (LVER) staff. Indiana currently has 28 DVOP specialists and 20 LVER staff. DVOP specialists provide individualized career services to veterans with significant barriers to employment, with the maximum emphasis directed toward serving veterans who are economically or educationally disadvantaged. Veterans with barriers include homeless veterans and vocational rehabilitation clients. LVERs conduct outreach to employers and business associations and engage in advocacy efforts with hiring executives to increase employment opportunities for veterans and encourage the hiring of disabled veterans.⁶⁴ Veteran-focused policies on the State level include DWD Policy 2019-03,⁶⁵ which further

⁶² <https://www.indianacareerready.com/JobSeeker/DisabilityServices>

⁶³ <https://www.in.gov/dwd/2416.htm>

⁶⁴ Documentation 4.7: USDOL JVSG Program Fact Sheet

⁶⁵ Documentation 4.8: DWD Policy 2019-03: DVOP and LVER Roles/Responsibilities

explains required roles and responsibilities for DVOPs and LVERs, and DWD Policy 2015-08,⁶⁶ which outlines priority of service for Veterans and eligible spouses.

Priority of Service

WIOA requires that priority of service be given to recipients of public assistance, other low income individuals, and individuals who are basic skills deficient for receipt of career services and training services.⁶⁷ Priority of service assists with ensuring meaningful access to all populations served, including disabled and LEP individuals. DWD has instructed LWDAs⁶⁸ that priority must be given to participants that fall into those three categories, as summarized below to include:

1. Recipients of public assistance.
2. Other low income individuals, meaning an individual who:
 - Receives, or in the past six months has received, or is a member of a family that is receiving or has received in the past six months, assistance through the supplemental nutrition program (SNAP), Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI) under title XVI of the Social Security Act, or a state or local income-based public assistance program; or
 - Is in a family with total family income that does not exceed the higher of the poverty line or 70% of the lower living standard income level; or
 - Is a homeless individual; or
 - **Receives or is eligible to receive a free or reduced-price lunch; or**
 - **A foster child on behalf of whom state or local government payments are made; or**
 - Is an individual with a disability whose own income meets the income requirements above, but who is a member of family whose income does not meet this requirement.
3. Individuals who are basic skills deficient, meaning a youth or adult who is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society. DWD considers an individual who meets ANY ONE of the following to be basic skills deficient:
 - Lacks a high school diploma or equivalency and is not enrolled in secondary education; or
 - Scores 8.9 or below on the TABE; or
 - Is enrolled in Title II adult education (including enrolled for ESL); or
 - Has poor English language skills (and would be appropriate for ESL even if the individual isn't enrolled at the time of WIOA entry into participation); or

⁶⁶ Documentation 4.9: DWD Policy 2015-08: Priority of Services for Veterans and Eligible Spouses

⁶⁷ WIOA Section 134(c)(3)(E)

⁶⁸ Documentation 4.10: DWD Policy 2019-04, **Change 1**: WIOA Title I Adult Priority of Service

- The case manager makes observations of deficient functioning and records those observations as justification in a case note.

The LWDAs track priority of service within ICC. Each LWDA must have written policy delineating how it will give priority of service. DWD is available for technical assistance to LWDAs that do not have 50% or more of their adult participants enrolled into one of the priority categories. Participants served as incumbent workers are excluded from the priority calculation.

Partnership with Vocational Rehabilitation Services

DWD and its WorkOne system strive to maximize partner resources. For example, DWD coordinates with the Indiana Family and Social Services Administration (FSSA) and its Vocational Rehabilitation Services (VR or VRS) Division. VRS provides quality individualized services to enhance and support people with disabilities to prepare for, obtain or retain employment. Examples of the coordination between DWD, FSSA/VRS include:

- Implementation of Order of Selection (OS).⁶⁹ The Rehabilitation Act, as amended by WIOA, requires a state vocational rehabilitation agency to implement OS when it does not have sufficient resources to serve all eligible individuals. On August 1, 2017, Indiana became the 35th state to implement this process, which must be used to prioritize services to individuals with the most significant disabilities first. OS categorizes severity of disability into three priority categories:
 - Priority Category 1: Individuals with most significant disabilities
 - Priority Category 2: Individuals with significant disabilities
 - Priority Category 3: All other VRS eligible individuals (nonsignificant disabilities)

Under OS, Priority Category 1 individuals are served first. Priority Category 2 and 3 individuals are put on a deferred services list to be served if and when sufficient resources become available. Currently, Priority Category 3 individuals are referred to the WorkOne system.

- Cross training and service coordination. DWD/VR cohosted trainings in June and August 2017 to discuss the implementation and impact of OS. The trainings provided an opportunity for the partner agencies to learn more about each other and the services offered by each. Training was conducted to assist each partner in understanding VR and WIOA eligibility requirements, challenges, disability etiquette, and how best to serve various disabilities based on OS categories.⁷⁰
- FSSA/VRS promotion of the WorkOne system's accessible workstations and referring/meeting clients at the WorkOne centers to assist with their client's job search. DWD plans to provide additional staff training on the accessible work stations.
- DWD invited Bureau of Rehabilitation Services to utilize their new customer relationship management (CRM) system, INGage, to track business engagement efforts which are

⁶⁹ Documentation 4.11: Order of Selection; Documentation 4.12: Order of Selection FAQ

⁷⁰ Documentation 4.13: DWD/VR Roundtable Summit Notes; Documentation 4.14: Excerpts from DWD/VR Training Presentations

reported annually to DOL and U.S. Dept. of Education Rehabilitation Services Administration through a federally required annual report. A VR staff member is lead on this and began using the system in 2018 to collect data and information about employers with who we are engaged through activities such as sharing job openings and providing disability awareness training. This collaborative effort will also help both partners to know which business are actively working with each agency.

- The Disability and Employment eLearning Task Force in collaboration with the Employment and Training Administration (ETA) released three eLearning Training Modules to help support the professional development needs of the workforce development staff across the country.

The eLearning task force was comprised of 27 members from 20 states across WIOA programs to help shape the development of online training tools to support nearly 2,400 American Job Centers. Individuals from DWD and VR were active members of this e-learning task force to create the three e-learning modules for AJCs. In building on the lessons learned from the Workforce Innovation Cohort on Disability and Employment that finished in May 2019, members of this new task force shared their ideas and insights to help drive the content in supporting the development of the eLearning modules. These modules are designed to help support AJCs provide more effective and efficient services to individuals with disabilities and businesses using services. The eLearning modules developed were:

- Module 1: Serving Individuals with Disabilities-A Day in the Life of an American Job Center
 - Module2: Working Across Partners-A Day in the life of an American Job Center
 - Module 3: Providing Inclusive Business Services-A Day in the Life of an American Job Center
- DWD and VR will continue cross-training efforts (building upon previous cross training). The new training initiative is webinar training for DWD, VR, and partner staff. There is a pre-work component for our staff and partners, as well as a request for all DWD/VR and partner staff to complete the following training:

- [Module 1: Serving Individuals with Disabilities](#)
- [eLearning Module 1 Activity Sheet](#)
- [Module 2: Working Across Partners](#)
- [Module 3: Providing Inclusive Business Services](#)
- [Disability and Employment eLearning Modules Homepage](#)
- [Manager's Toolkit: Disability and Employment eLearning Modules](#)

This first training course is the first of a three-part series that discusses workforce collaboration and integration. This course will provide staff/partners with a foundation for

collaboration and integration for the state of Indiana by using co-enrollment and joint case management strategies to achieve this goal. The following will be covered in the first Cross Training initiative:

Introduction- In this module, learners are welcomed to the course and provided with information about how to navigate the course.

Integration and Collaboration- In this module, learners learn more about how Indiana is changing their focus to deliver activities and services with more collaboration and integration. Specifically, this course will cover the goals, approach, and method for achievement of this combined approach.

Element 4 Documentation

Documentation 4.1: Hoosiers by the Numbers Sample Data

Documentation 4.2: United States Census Bureau Sample Data

Documentation 4.3: ICC Demographics Sample Data

Documentation 4.4: Affirmative Outreach Sample I

Documentation 4.5: Affirmative Outreach Sample II

Documentation 4.6: Sample of Spanish Materials

Documentation 4.7: USDOL JVSG Program Fact Sheet

Documentation 4.8: DWD Policy 2019-03: DVOP and LVER Roles/Responsibilities

Documentation 4.9: DWD Policy 2015-08: Priority of Service for Veterans and Eligible Spouses

Documentation 4.10: DWD Policy 2019-04, Change 1: WIOA Title I Adult Priority of Service


Documentation 4.11: Order of Selection

Documentation 4.12: Order of Selection FAQ

Documentation 4.13: DWD/VR Roundtable Summit Notes

Documentation 4.14: Excerpts from DWD/VR Training Presentations

← → ↻ 🔒 hoosierdata.in.gov/dpage.asp?id=6&view_number=1&menu_level=&panel_number=2 🔍 📄 ☆ ⚙️ 👤 ⋮


HOOSIERS BY THE NUMBERS
 Your premier source for labor market information for Indiana.

ENHANCED BY Google

[Home](#)
[Data by Region ▾](#)
[Data by Topic ▾](#)
[Tools & Resources ▾](#)
[Data Request Portal](#)

Race and Ethnicity

[Data](#)
[Help & FAQs](#)
[More Resources](#)

[Overview](#)
[Comparison](#)
[Time Series](#)


General Area:
 Year:
 Format:

Select Geography:

Race and Ethnicity

[Printable Version](#)

Population by Race in 2021



	Total	Percent Change From 2000	Percent Distribution
Marion Co, IN in 2021			
All Races	971,102	12.8%	100.0%
White	606,374	-2.7%	62.4%
Black	287,669	36.6%	29.6%
Asian	40,336	214.0%	4.2%
American Indian/Alaska Native	4,682	91.8%	0.5%
Hawaiian and Other Pacific Islander	538	20.4%	0.1%
Two or more races	31,503	179.5%	3.2%
Hispanic or Latino	110,160	222.3%	11.3%
Not Hispanic or Latino	860,942	4.1%	88.7%

Source: U.S. Census Bureau
 Notes: Total minority is the sum of all races excluding white; this summing can result in some duplication since Hispanics can be of any race.

<https://www.hoosierdata.in.gov/index.asp>

EMPLOYMENT STATUS		United States Census Bureau		Marion County, Indiana			
				Total	Labor Force Participation Rate	Employment/P opulation Ratio	Unemployment rate
Note: The table shown may have been modified by user selections. Some information may be missing.			Label	Estimate	Estimate	Estimate	Estimate
			Population 16 years and over	740,136	67.10%	62.80%	6.30%
DATA NOTES			AGE				
TABLE ID:	S2301		16 to 19 years	46,443	43.20%	34.00%	21.30%
SURVEY/PROGRAM:	American Community Survey		20 to 24 years	67,291	77.40%	69.50%	10.00%
VINTAGE:	2019		25 to 29 years	85,182	85.40%	79.50%	6.80%
DATASET:	ACSST5Y2019		30 to 34 years	74,270	83.30%	78.70%	5.30%
PRODUCT:	ACS 5-Year Estimates Subject Tables		35 to 44 years	122,197	83.10%	78.30%	5.80%
UNIVERSE:	None		45 to 54 years	113,985	79.70%	76.10%	4.40%
FTP URL:	None		55 to 59 years	60,660	72.60%	70.00%	3.60%
API URL:	https://api.census.gov/data/2019/acs/acs5/subject		60 to 64 years	53,302	57.20%	55.20%	3.50%
			65 to 74 years	68,988	28.30%	26.90%	4.70%
USER SELECTIONS			75 years and over	47,818	7.10%	6.80%	3.80%
TABLES	S2301		RACE AND HISPANIC OR LATINO ORIGIN				
GEOS	Marion County, Indiana		White alone	478,767	66.80%	63.70%	4.50%
			American alone	197,844	66.50%	58.90%	11.40%
EXCLUDED COLUMNS		Marion County, Indiana!!Total!!Margin of Error	American Indian and Alaska Native alone	1,930	64.80%	60.80%	6.10%
		Marion County, Indiana!!Labor Force Participation Rate!!Margin of Error	Asian alone	23,533	68.20%	65.90%	3.40%
		Marion County, Indiana!!Employment/Population Ratio!!Margin of Error	Other Pacific Islander alone	184	64.70%	48.90%	24.40%
		Marion County, Indiana!!Unemployment rate!!Margin of Error	alone	20,303	75.50%	73.20%	3.10%
			Two or more races	17,575	72.10%	67.90%	5.90%
APPLIED FILTERS		None	Hispanic or Latino origin (of any race)	61,319	72.20%	68.90%	4.50%
			White alone, not Hispanic or Latino	440,210	66.30%	63.30%	4.40%
APPLIED SORTS		None	Population 20 to 64 years	576,887	78.60%	74.10%	5.70%
			SEX				
PIVOT & GROUPING		None	Male	277,986	81.70%	76.90%	5.80%
			Female	298,901	75.70%	71.40%	5.70%
WEB ADDRESS		https://data.census.gov/cedsci/table?q=S2301&g=0500000U18097&tid=ACSST5Y2019.S2301&hidePreview=true&moe=false					
TABLE NOTES		Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for					
		Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Technical Documentation section.					
		Source: U.S. Census Bureau, 2015-2019 American Community Survey 5-Year Estimates					
		Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of					
		Employment and unemployment estimates may vary from the official labor force data released by the Bureau of Labor Statistics because of differences in survey design and data collection. For guidance on differences in employment and					
		The 2015-2019 American Community Survey (ACS) data generally reflect the September 2018 Office of Management and					
		Estimates of urban and rural populations, housing units, and characteristics reflect boundaries of urban areas defined based					
		Explanation of Symbols: * An "****" entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not					
COLUMN NOTES		None					

Enrolled Individuals - By Race

- Report Type: Title I - Workforce Development (WIOA)
 - Region/LWIA Name: Region 12
 - Custom Age Range: 16-100
 - Date Filter: Participation Date
 - Start Date: 7/1/2020
 - End Date: 6/30/2021
- Report Run Time: 11/4/2021 10:40:55 AM

Race	Total	% Total
African American/Black	325	74.37%
American Indian/Alaskan Native	1	0.23%
Asian	3	0.69%
White	68	15.56%
I do not wish to answer.	25	5.72%
Other	17	3.89%
Race	Total	% Total
Total Rows: 6		

Job Fair at Shelbyville WorkOne

AmericanJobCenter
INDIANA

Central Indiana

2177 Intelliplex Drive Ste 200

Shelbyville, IN 46176

(317) 392-3251

THURSDAY, June 30th, 2022 11am-2pm

**MEET AND TALK TO PROFESSIONALS FROM
A WIDE RANGE OF CAREER PATHS**

Job opportunities in the fields of:

- Patient Care Techs
- LPN / RN / Doctors
- Food Service
- Janitorial /Maintenance
- Pharmacy Techs
- Office Assistants
- Press Operators
- Machinists

MHP | MAJOR HEALTH
PARTNERS

DWD
INDIANA DEPARTMENT OF
WORKFORCE
DEVELOPMENT

FREUDENBERG
INNOVATING TOGETHER

Feria de Empleo en Shelbyville WorkOne

Central Indiana

American Job Center
INDIANA

2177 Intelliplex Drive Ste 200
Shelbyville, IN 46176
(317) 392-3251

JUEVES, 30 de junio de 2022 11am-2pm

CONOZCA Y HABLA CON PROFESIONALES DE

UNA AMPLIA GAMA DE CARRERAS PROFESIONALES

Oportunidades de trabajo en los campos de:

- Técnicos de atención al paciente
- LPN / RN / Médicos
- Servicio de comida
- Conserjería/Mantenimiento
- Tecnologías de farmacia
- asistentes de oficina
- Operadores de Prensa
- maquinistas

MHP | MAJOR HEALTH PARTNERS

DWD
INDIANA DEPARTMENT OF
WORKFORCE
DEVELOPMENT

FREUDENBERG
INNOVATING TOGETHER



WorkOne
West Central
americanjobcenter
INDIANA

WINTER MAGAZINE

DECEMBER 2021 - JANUARY 2022

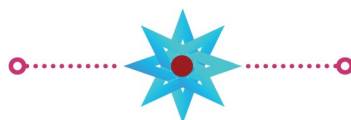
JOB SEEKER SERVICES & EMPLOYER BUSINESS SERVICES

Free Resume, Interview, & Job Search Workshops
JOIN US!

Whether you are looking to improve your job qualifications, explore a different profession, find a new career or hire an employee, WorkOne can help!

<https://www.in.gov/dwd/workonewestcentral>

TABLE of CONTENTS



WorkOne West Central Magazine

Services 3-7		<p>WorkOne offers free Job Seeker services to help you keep pace with a changing world. Whether you are looking for a new job, considering an employment change, or need to develop a career plan, we can help.</p>
Programs 8-13		<p>Training Programs for job seekers interested in paid training and paid internships as well as one-on-one interviews with employers are just some of the programs we offer. Need a career certificate or your HSE? Check out our programs.</p>
Calendars 14-15		<p>Workshop calendars feature Hybrid Workshops with instructions for registration. Sessions are 30-45 minutes in length and cover topics about creating and using resumes, job interviews, online job searching, and employment background checks.</p>
Locations 16		<p>WorkOne Centers provide one-stop access of workforce development services for customers and employers of each community. Office hours are from 8:00 AM to 4:30 PM Monday through Friday or by appointment as noted on the back of this magazine.</p>

WorkOne and its community of partners are dedicated to assisting you by providing access to employment, education, training, and supportive services for job seekers' success in the labor market and to match employers with the skilled workers they need to compete in the global economy.

USDOL-ETA Funding Acknowledgement and Product Disclaimer

This workforce product was funded by a grant awarded by the U.S. Department of Labor's Employment and Training Administration. The product was created by the recipient and does not necessarily reflect the official position of the U.S. Department of Labor. The Department of Labor makes no guarantees, warranties, or assurances of any kind, express or implied, with respect to such information including any information on linked sites and including, but not limited to, accuracy of the information or its completeness, timeliness, usefulness, adequacy, continued availability, or ownership. This product is copyrighted by the institution that created it.

<https://www.in.gov/dwd/workonewestcentral>

FACTS ABOUT WORKONE SERVICES

IF YOU NEED TO GET ...



A JOB RIGHT NOW:

Come see us! Visit a WorkOne office. Get help job searching. Register for a workshop. Talk to an employment specialist for the best guidance moving your career forward today.

<https://www.in.gov/dwd/workonewestcentral>



EDUCATION & TRAINING

Need an HSE diploma? Need a career certificate? We can help. Maybe you're interested in the Advanced Manufacturing Industry. Yup! We've got that!

<https://www.in.gov/dwd/workonewestcentral>



UNEMPLOYMENT BENEFITS:

If you are unemployed due to no fault of your own, you may be eligible for unemployment insurance benefits. To file a claim, visit, [in.gov/dwd/unemployment](https://www.in.gov/dwd/unemployment)

Customer Service 1-800-891-6499



SKILLS WORKSHOPS

WorkOne workshops take less than an hour and give you the latest information and tools. Trained facilitators show you the best way to reach your goal.

<https://www.in.gov/dwd/workonewestcentral>

The WorkOne System is an equal opportunity employer and does not discriminate in the programs and services offered. Auxiliary aids and services are available upon request to individuals with disabilities. The TDD/TTY number is 1-800-743-3333. El Programa de Financiamiento asistido de acuerdo con el Título 1 de WIA es un programa de Igualdad de Oportunidades de Empleo. Ayuda y servicios auxiliares están disponibles a solicitud para personas con discapacidad. El numero de TDD/TTY es 1-800-743-3333.

See WorkOne office locations and hours of operation on the back.

3



ADULT SERVICES

If you are an adult, we offer job seeker services such as workshops on job searching, resume development, interviewing, and digital literacy; paid training, on-the-job training, and certifications opportunities; career skills evaluations and assessments; and career counseling with employment specialists.

YOUTH SERVICES

If you are between the ages of 16 and 24, WorkOne Youth Services can help you get the education and training you need to succeed. Career Coaches work together with you to develop occupational goals with career planning, training, internships, on-the-job training and mentoring opportunities.



VETERAN SERVICES

Thank you for your service! WorkOne is committed to providing Veterans with priority service in transitioning from a military to a civilian workforce. Veteran Specialists provide employment services to eligible Veterans and eligible spouses with significant barriers to employment.

DISLOCATED WORKER SERVICES

If you have lost your job as a result of a layoff, downsizing, or plant closure, you can take advantage of our re-employment services as well as all of the Adult Services which include skills workshops and career counseling. Visit a WorkOne office near you and ask to speak with an employment specialist about your next job.



<https://www.in.gov/dwd/workonewestcentral>



ADDITIONAL Services & Information



To file an **Unemployment Insurance Claim**, visit in.gov/dwd/unemployment and create an Uplink account.

For Unemployment Help:

Call the Unemployment Customer Service Center at **1-800-891-6499**.

IMPACT
Indiana Manpower and Comprehensive Training



To learn more about how you can take advantage of this exciting opportunity, contact your IMPACT case worker or call: **800.403.0864** and choose **option 3**

Now offering child care support services!



Supplemental Nutritional Assistance Program (SNAP)

Go to this site:
in.gov/fssa/dfr/2691.htm

Purpose of SNAP:

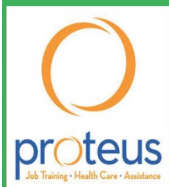
Provides food assistance to low- and no-income individuals and families.



Vocational Rehabilitation Services (VR) provides quality individualized services to enhance and support people with disabilities to prepare for, obtain, or retain employment

Call 1-800-545-7763.

Go to <http://vrs.in.gov>



Proteus provides services and financial assistance to help migrant and seasonal farm workers qualify for better jobs and achieve a better standard of living.

Call 1-855-765-6687

Go to www.proteusinc.net



Trade Adjustment Assistance (TAA) seeks to provide U.S. Workers who are adversely affected by trade with the opportunity to obtain skills, resources, and support to become reemployed.

Go to: <http://www.in.gov/dwd/2423.htm>



Indiana Adult Education programs provide math, reading, and writing education instruction at no cost to help you attain the skills needed to earn a high school equivalency diploma.

Find out more! | Go to: <http://www.in.gov/dwd/adulted.htm>

EMPLOYER BUSINESS SERVICES INCLUDE

- Job posting and recruitment events
- Screening services
- Qualified applicant searches
- WorkKeys job tasks analysis and assessment
- On-the-Job Training grants
- Space to conduct interviews



Next Level Jobs Employer Training Grant

Available for employers in high wage/high demand industries including:

- | | |
|-----------------------------|--------------------------------|
| ■ Advanced Manufacturing | ■ Health and Life Sciences |
| ■ IT and Business Services | ■ Transportation and Logistics |
| ■ Building and Construction | ■ Agriculture |

To apply, visit www.NextLevelJobs.org

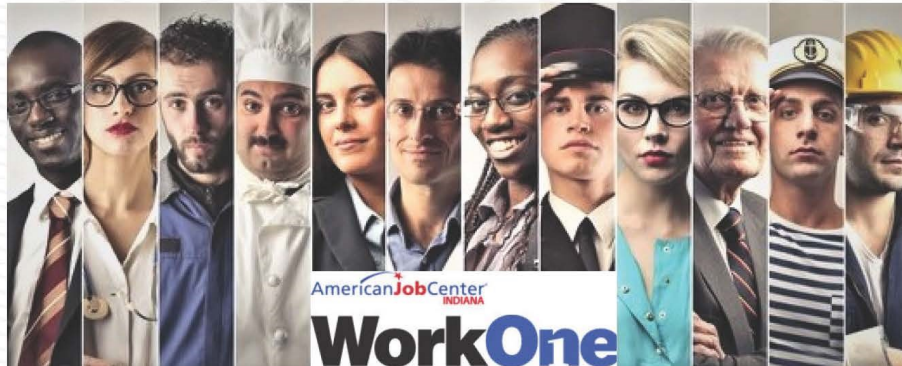
Apply even if you aren't sure you qualify. The team will work with you to try to create a qualifying training plan. Employers can receive reimbursement for up to \$5K per individual trained and a total maximum of \$50K per employer.



***FIND THE
TALENT
YOU NEED AT
WORKONE.***



Top Demand Occupations



Occupations listed are growing in-demand careers in West Central Indiana. These are careers that can be supported with funding to ensure skill development that matches the workforce needs of businesses and employers throughout Region 4.

Accountant and Auditors	Industrial Production Manager
Administrative Services Manager	Industrial Machinery Repairers/Maintenance
Architectural and Engineering Managers	Industrial Truck and Tractor Operators
Assemblers & Fabricators	Inspectors, Testers, Sorters, Samplers, and Weighers
Automotive Service Technician/Mechanic	Licensed Practical Nurse (LPN)
Bookkeeping, Accounting, and Auditing Clerks	Machinist
Bus and Truck Mechanics and Diesel Engine Specialists	Maintenance and Repair Workers
Carpenters	Management Analyst
Clinical Laboratory Technologist	Manufacturing Production Technician
Commercial/Industrial Truck Drivers/Operators	Material Moving Worker
Computer and Information Systems Manager	Mechanical Engineers
Computer Numerically Controlled Operator/Programmer (CNC)	Medical and Clinical Laboratory Technologist
Computer Software Developers	Medical and Health Services Manager
Computer Systems Analyst	Medical Assistant
Construction Laborers	Medical Record and Health Information Technician
Construction Manager	Millwright
Correctional Officer	Multiple Machine Tool Setters, Operators, and Tenders, Metal and Plastic
Counselor	Network and Computer Systems Administrator
Customer Service Representative	Nursing Assistant
Dental Assistant	Occupational Therapists
Dental Hygienist	Pharmacist
Education Administrator	Pharmacy Technicians
Educational, Vocational, and School Counselors	Plumbers, Pipefitters and Steamfitters
Electrical and Electronic Engineering Technicians	Police and Sheriff's Patrol Officers
Electrician	Postsecondary Teachers
Electronics Engineers, Except Computer	Precision Electrical & Electronic Equipment Assemblers
Elementary, Middle School and Secondary School Teacher	Precision Metal Workers
Emergency Paramedic, EMT	Production Workers
Executive Secretaries and Administrative Assistants	Radiological Technologist
Financial Managers	Registered Nurse (RN)
First-line Supervisors/Managers of Construction Trades & Extraction Workers	Respiratory, Occupational, Physical Therapist
First-line Supervisors/Managers of Mechanics, Installers, & Repairers	Sales Representatives
First-line Supervisors/Managers of Office and Administrative Support Workers	Secretaries and Administrative Assistants
First-line Supervisors/Managers of Production & Operating Workers	Security Guards
First-line Supervisors/Managers of Retail Sales Workers	Shipping, Receiving, and Traffic Clerks
First-line Supervisors/Managers of Transportation & Material-moving machine and vehicle operators	Social Workers
General and Operations Manager	Special Education School Teacher
General Office Occupations	Surgical Technologist
Heating, Air Conditioning, and Refrigeration Mechanics and Installers	Team Assemblers
Home Health Aides	Tool & Die Makers
Industrial Engineers	Truck Drivers, Heavy and Tractor-Trailer
	Veterinarians
	Welders, Cutters, Solderers, and Brazers

See WorkOne office locations and hours of operation on the back.

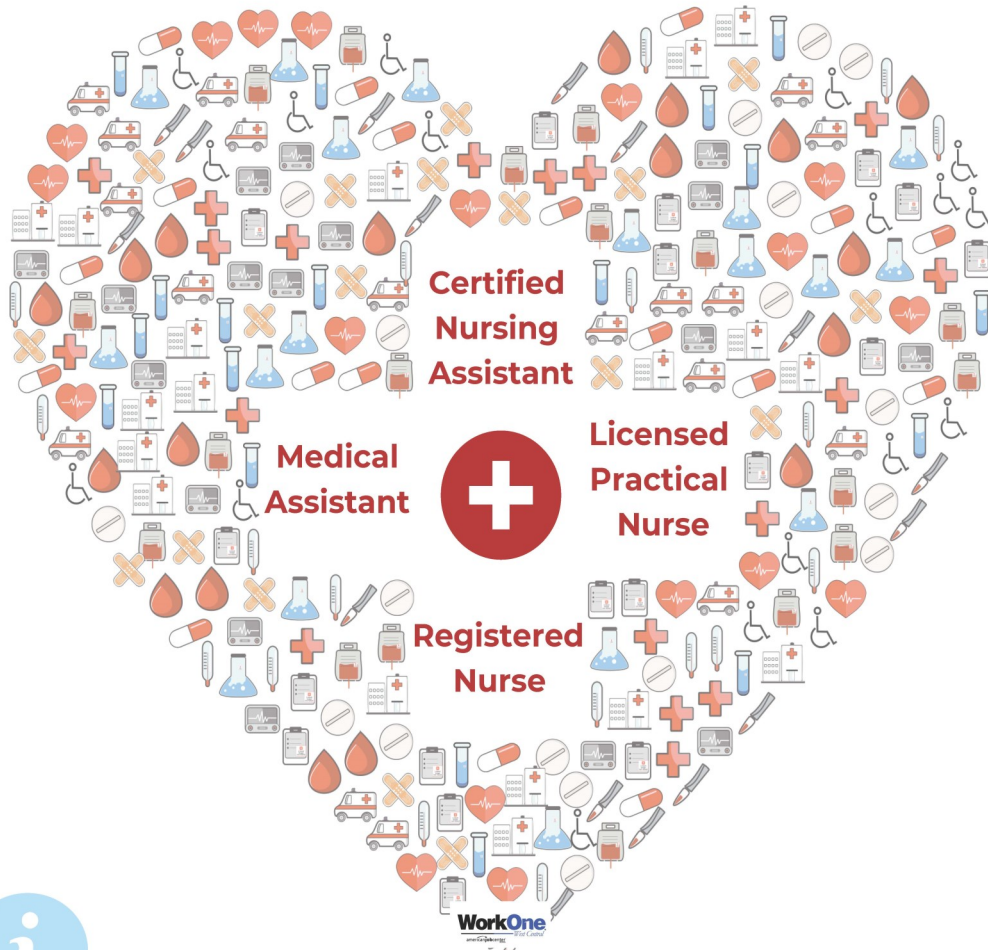
7

Rural Healthcare Grant



Are you a resident of a rural county interested in the healthcare field?  Are you willing to work in healthcare in a rural county?

The Rural Healthcare Grant provides employment and training services to individuals who will gain the skills and competencies required to enter jobs in a healthcare occupations pathway in order to address workforce shortages in rural areas. 



For more information about the Rural Healthcare Grant, please contact:

Kris Trainer at WorkOne Logansport: ktrainer@workonewestcentral.org or 574-722-6652

Tim Carson at WorkOne Peru: tcarson@workonewestcentral.org or 765-472-3562

David Kurth at WorkOne Monticello: dkurth@workonewestcentral.org or 574-583-4128

Nikki Worl at WorkOne Kokomo: nworl@workonewestcentral.org or 765-450-3019

Tracey Winger at WorkOne Lafayette: twinger@workonewestcentral.org or 765-446-2735

An initiative of the West Central Indiana Region 4 Workforce Board. Funding for this project has been provided by Indiana Department of Workforce Development. The WorkOne System is an equal opportunity employer and does not discriminate in the programs and services offered. Auxiliary aids and services are available upon request to individuals with disabilities.

<https://www.in.gov/dwd/workonewestcentral>

Are You 16-24 Years Old? Want to Work? Come See Us.



#iWork is a federally grant funded training program aimed at helping determined youth find a career pathway in a field of their choice. #iWork Program is a virtual model that consists of 2 weeks, 20 hours per week for a maximum of 40 hours of classroom instruction. Participants earn \$10/hr while attending career readiness workshops.



Upon completing the paid two-week workshop training, participants have the opportunity to work one on one with job development staff. Together you'll establish a paid internship in a career field of your choice that pay \$10-\$15 an hour.

What's Covered?

CAREER PLANNING	MOCK INTERVIEWS
INTERVIEW SKILLS	JOB SEARCH TECHNIQUES
RESUME DEVELOPMENT	WORKFORCE ETHICS
TIME MANAGEMENT	JOB KEEPING SKILLS
ELEVATOR SPEECH	
PROFESSIONALISM	



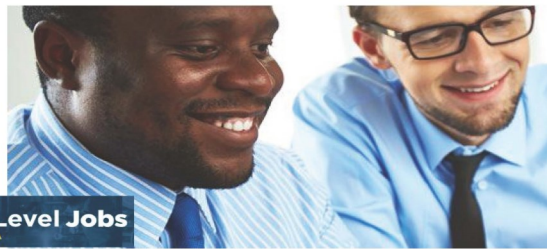
Find Out More...

Kokomo 765-413-2560
or
Lafayette 765-446-2795

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

Get to know

INDIANACAREERREADY


NextLevel Jobs
 INDIANA

INDIANACAREERREADY

Your one-stop Career Spot for Jobs, Training, and More.

1. GO TO INDIANACAREERREADY.COM

INDIANACAREERREADY is your single source providing the tools needed to prepare and find high-demand and high-wage jobs needed now and in the future. Step inside and discover the next level of your career!

2. APPLY FOR JOBS

INDIANACAREERCONNECT

INDIANACAREERREADY provides tools to help prepare and connect you to high-demand, high-wage jobs available. Whether you are looking for a new job, searching for something more or wondering what skills employers need, just click on "Apply for Jobs" and hop on over to IndianaCareerConnect.com.

3. EXPLORE YOUR INTERESTS

The Career Assessment Tools give you insight into career options and help increase your success. Try all these:

IndianaCareerExplorer.Com

MyNextMove.Org

IndianaCareerConnect.Com

INDIANACAREERCONNECT

4. EDUCATION AND TRAINING

Connect to training and education resources for careers requiring certifications, and/or 2 and 4 year degrees.



5. WORK-BASED LEARNING

The Office of Work-Based Learning and Apprenticeship, within the Department of Workforce Development and part of Gov. Holcomb's NextLevel Agenda, serves to develop and implement various work-based learning pathways for both youth and adult populations.


<https://www.in.gov/dwd/workonewestcentral>



Region 4 Adult Education Information

Tippecanoe County: Lafayette Adult Resource Academy (LARA) -

1100 Elizabeth St., Lafayette, IN 47906 | Telephone: 765-476-2920

Carroll Co. - Delphi Adult Education -

711 Armory Rd., Delphi, IN 46923 | Telephone: 765-564-2100, Ext. 1100

Clinton Co. - The Learning Network -

1111 S. Jackson St., Frankfort, IN 46041 | Telephone: 765-659-6380, Ext 1822

Tipton Co. - Tipton Adult Education Center -

At this time, please contact Lafayette Adult Resource Academy (LARA) | Telephone: 765-476-2920

White Co., White County Academic Skills Center -

1017 O'Connor Blvd., Monticello, IN 47960 | Telephone: 574-583-5158



Benton, Fountain, & Warren Counties - Telephone 765-764-1880

Benton Co. - Benton County Adult Education -

105 S. Howard St., Oxford, IN 47971

Fountain Co. - Main Street Center -

101 N. Main St., Veedersburg, IN 47987

Warren Co. - Warren County Learning Center -

26 E. Second St., Williamsport, IN 47993

Montgomery County - Crawfordsville Adult Resource Academy (CARA) -

1501 S. Elm St., Crawfordsville, IN 47933 | Telephone: 765-362-2690

Cass County - Adult Learning Center -

2815 E. Market St., Logansport, IN 46947 | Telephone 574-722-2912

Howard County - Kokomo Area Career Center -

2415 S. Berkley Rd., Kokomo, IN 46902 | Telephone: 765-455-8021

Miami County - Miami County Adult Education -

19 N. Park Dr., Peru, IN 46970 | Telephone: 765-432-0998



Effective July 1, 2021, Indiana will transition to a new high school equivalency exam. HiSET® will become the state's exam to earn an Indiana high school equivalency diploma (HSED). A transition period from the current TASC (Test Assessing Secondary Completion™) exam will allow examinees to complete any unfinished tests from July 1 – October 15, 2021. New adult education students will take the HiSET® exam July 1 and after.

Find out more at <https://www.in.gov/dwd/adulted.htm>

VETERAN SERVICES

WorkOne is committed to providing Veterans with priority service in transitioning from a military to a civilian workforce.

Veteran Specialists provide employment services to eligible Veterans and eligible spouses with significant barriers to employment.



Kokomo WorkOne:

Eli Ireland

Disabled Veteran's Outreach Program Specialist
700 East Firmin St., Suite 150 | Kokomo, IN 46902
Office: 765-450-3029 | Cell: 765-431-0969
Email: eireland@dwd.in.gov

Lafayette WorkOne:

Donald Nedza

Disabled Veteran's Outreach Program Specialist
820 Park East Boulevard | Lafayette, IN 47905
Office: 765-446-2630 | Cell: 765-716-4172
Email: dnedza@dwd.in.gov



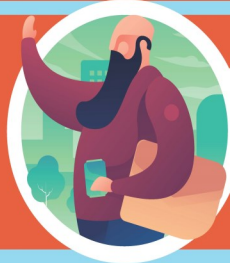
WHOA, WORKSHOPS ARE HYBRID?!

Yes. Come In Person or Online.

In-person workshops are available at our full-service offices in Kokomo and Lafayette.

Virtual workshops are offered online using Zoom.us or the Zoom app.

Learn more at: <https://zoomusdownload.com/how-to-use-zoom-app/>



Job Search Online Workshop

Learn to make your online job search efforts pay off by using [IndianaCareerConnect.Com](https://indianacareerconnect.com) and other job search engines. Offered every Monday and Wednesday at 10:00 AM. Use the QR code to register for a virtual workshop.



Work Readiness & Employment Background Check Workshop

Covers top soft skills employers seek and helps you know what all goes into employment background checks. Offered every Tuesday and Thursday at 12:00 PM. Use the QR code to register for a virtual workshop.



Resume Workshop

Resume Workshop includes steps to complete a resume using Indiana Career Connect (ICC). Offered every Monday and Wednesday at 12 PM. Use the QR code to register for a virtual workshop.





Interview Workshop

Know what you need to prepare for today's interviews including researching the employer, creating your elevator speech, how to answer popular general and behavioral questions, and what to wear. Offered every Tuesday and Thursday at 10:00 AM. Use the QR code to register for a virtual workshop.

See Workshop Calendar pages 14-15 for exact dates. See staff to register for in-person workshops.

DECEMBER 2021

WORKSHOP CALENDAR

Monday	Tuesday	Wednesday	Thursday	Friday
<u>WORKSHOP DESCRIPTIONS:</u> Resume: How to make a resume in IndianaCareerConnect.Com Interviewing: Key preparation tips for most interview situations Job Search: Learn how to find jobs using a variety of online tools Work Readiness & Employment Background Checks: Learn what employers expect & what's in most background checks				
		1 10:00 Job Search Noon: Resume	2 10:00 Interviewing Noon: Work Readiness & Employment Background Checks	3
6 10:00 Job Search Noon: Resume	7 10:00 Interviewing Noon: Work Readiness & Employment Background Checks	8 10:00 Job Search Noon: Resume	9 10:00 Interviewing Noon: Work Readiness & Employment Background Checks	10
13 10:00 Job Search Noon: Resume	14 10:00 Interviewing Noon: Work Readiness & Employment Background Checks	15 10:00 Job Search Noon: Resume	16 10:00 Interviewing Noon: Work Readiness & Employment Background Checks	17
20 10:00 Job Search Noon: Resume	21	22	23 OFFICE CLOSED 	24 OFFICE CLOSED
27	28	29	30 10:00 Interviewing Noon: Work Readiness & Employment Background Checks	31 OFFICE CLOSED 

<https://www.in.gov/dwd/workonewestcentral>

JANUARY 2022

WORKSHOP CALENDAR

Monday	Tuesday	Wednesday	Thursday	Friday
3 10:00 Job Search Noon: Resume	4 10:00 Interviewing Noon: Work Readiness & Employment Background Checks	5 10:00 Job Search Noon: Resume	6 10:00 Interviewing Noon: Work Readiness & Employment Background Checks	7
10 10:00 Job Search Noon: Resume	11 10:00 Interviewing Noon: Work Readiness & Employment Background Checks	12 10:00 Job Search Noon: Resume	13 10:00 Interviewing Noon: Work Readiness & Employment Background Checks	14
17 OFFICE CLOSED  MARTIN LUTHER KING DAY	18 10:00 Interviewing Noon: Work Readiness & Employment Background Checks	19 10:00 Job Search Noon: Resume	20 10:00 Interviewing Noon: Work Readiness & Employment Background Checks	21
24 10:00 Job Search Noon: Resume	25 10:00 Interviewing Noon: Work Readiness & Employment Background Checks	26 10:00 Job Search Noon: Resume	27 10:00 Interviewing Noon: Work Readiness & Employment Background Checks	28
31 10:00 Job Search Noon: Resume	<p>REGISTER FOR VIRTUAL WORKSHOPS :</p> <ol style="list-style-type: none"> 1. Go to: https://workonewestcentral.as.me/VirtualWorkshops 2. Choose which workshop you want and click on "Sign Up." 3. Fill out the registration fields, then click on, "Complete Appointment." 4. You receive an email confirmation on how to join via Zoom. You get a reminder email 24 hours prior to your workshop. <p>REGISTER FOR IN-PERSON WORKSHOPS :</p> <p>In-Person workshops are only available at the same times listed <u>and</u> only in the full-service offices in Kokomo and Lafayette. For Lafayette In-Person Workshops, call 765-446-2730. For Kokomo In-Person Workshops, call 765-450-3046.</p> <div style="border: 2px solid yellow; padding: 5px; text-align: center;"> <p>Scan Code for Virtual Workshop Registration.</p>  </div>			

See WorkOne office locations and hours of operation on the back.

15

TO OUR CUSTOMERS:

PLEASE NOTE: FACE MASKS ARE REQUIRED IN ALL LOCATIONS.

WorkOne Comprehensive Offices are located in Kokomo & Lafayette. Hours of Operation - 8 :00 AM to 4:30 PM.

Please Note: Logansport, Monticello, and Peru offices close during Lunch from 12:30 PM to 1:30 PM.

*The option to make your appointment online is available.
See the link below each office location or scan the QR Code.*



SCAN QR CODE



Monticello WorkOne

1017 O'Connor Blvd.
Monticello, IN 47960
Phone (574) 583-4128

CLOSED on FRIDAYS

Schedule an Appointment:
[https://workonewestcentral.as.me/
MonticelloWorkOne](https://workonewestcentral.as.me/MonticelloWorkOne)



WorkOne Lafayette

820 Park East Blvd.
Lafayette, IN 47905
Phone (765) 474-5411

Schedule an Appointment:
[https://workonewestcentral.as.me/
LafayetteWorkOne](https://workonewestcentral.as.me/LafayetteWorkOne)



Logansport WorkOne

1 Ivy Tech Way, Suite B
Logansport, IN 46947
Phone (574) 722-6652

Schedule an Appointment:
[https://workonewestcentral.as.me/
LogansportWorkOne](https://workonewestcentral.as.me/LogansportWorkOne)



Peru WorkOne

685 East Main St.
Peru, IN 46970
Phone (765) 472-3562

Schedule an Appointment:
[https://workonewestcentral.as.me/
PeruWorkOne](https://workonewestcentral.as.me/PeruWorkOne)



WorkOne Kokomo

Inventrek Building
700 E. Firmin, Ste. 150
Kokomo, IN 46902
Phone (765) 450-3019

Schedule an Appointment:
[https://workonewestcentral.as.me/
KokomoWorkOne](https://workonewestcentral.as.me/KokomoWorkOne)



For residents in Benton, Carroll, Clinton, Fountain, Tipton, Montgomery, and Warren counties, please seek services from the WorkOne office nearest you.

Region 4
WORKFORCE
Board
Tecumseh Area Partnership, Inc.

An initiative of the West Central Indiana Region 4 Workforce Board. Funding for this project has been provided by Indiana Department of Workforce Development. The WorkOne System is an equal opportunity employer and does not discriminate in the programs and services offered. Auxiliary aids and services are available upon request to individuals with disabilities. The TDD/TTY number is 1-800-743-3333. • El Programa de Financiamiento asistido de acuerdo con el Título 1 de WIA es un programa de Igualdad de Oportunidades de Empleo. Ayuda y servicios auxiliares están disponibles a solicitud para personas con discapacidad. El número de TDD/TTY es 1-800-743-3333.

Oversight provided by Region 4 Workforce Board
WWW.REGION4WORKFORCEBOARD.ORG

Customer Satisfaction Survey

* ¿Qué te trajo a la oficina de WorkOne hoy?

- | | |
|---|---|
| <input type="radio"/> Asistencia de reclamo de seguro de desempleo | <input type="radio"/> Registro del empleador |
| <input type="radio"/> El Programa de Militares y Veteranos | <input type="radio"/> Educación Básica de Adultos (ABE) |
| <input type="radio"/> Búsqueda de trabajo | <input type="radio"/> Estoy aquí para ver a un miembro del personal específico. |
| <input type="radio"/> Entrenamiento / Capacitación | <input type="radio"/> Servicios con el Programa Asistencia de ajuste comercial / TAA |
| <input type="radio"/> Recibió una carta (como RESEA) | <input type="radio"/> Programa Juvenil (JAG) |
| <input type="radio"/> Recibió una carta (como JFH) | <input type="radio"/> Programa de Empleo de Servicios Comunitario para Personas Mayores |
| <input type="radio"/> Clases (como de curriculum o búsqueda de trabajo) | <input type="radio"/> Trabajadores Agrícolas Migrantes y Temporal. (MSFW) |
| <input type="radio"/> Prueba / evaluación | <input type="radio"/> No recibí ningún servicio adicional hoy |
| <input type="radio"/> Feria de Trabajo / Contratación | |

* Indique su satisfacción con el servicio que recibió con el beneficio del seguro de desempleo.

- | | |
|---|---|
| <input type="radio"/> Extremadamente satisfecho | <input type="radio"/> No tan satisfecho |
| <input type="radio"/> Muy satisfecho | <input type="radio"/> No satisfecho |
| <input type="radio"/> de alguna manera satisfecho | |

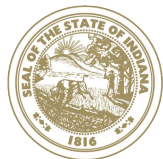
¿Tiene algún comentario que le gustaría compartir sobre el servicio que recibió?

* ¿Recibió algún otro servicio hoy?

- | | |
|--------------------------|--------------------------|
| <input type="radio"/> Sí | <input type="radio"/> No |
|--------------------------|--------------------------|

* Califique su satisfacción con los servicios del Programa de Militares y Veteranos que recibió hoy.

- | | |
|---|---|
| <input type="radio"/> Extremadamente satisfecho | <input type="radio"/> No tan satisfecho |
| <input type="radio"/> Muy satisfecho | <input type="radio"/> No satisfecho |
| <input type="radio"/> De alguna manera satisfecho | |



INDIANA
DEPARTMENT OF
WORKFORCE
DEVELOPMENT

(DEPARTAMENTO DE
DESARROLLO DE LA FUERZA
LABORAL DE INDIANA)



SEGURO DE DESEMPLEO –

MANUAL PARA LOS
SOLICITANTES

REV 03-26-2020

Índice

<u>Presentación</u>	<u>3</u>
Sobre este manual	3
¿Quién paga por el seguro de desempleo?	3
Solicitantes interestatales	3
Auditorías de Control de calidad	3
Fraude en el seguro de desempleo	3
<u>Cómo tramito los beneficios</u>	<u>4</u>
Aplicación	4
Información que usted debe proporcionar	4
Registro del trabajo	5
¿Qué puede esperar?	6
Período de espera	6
Visita en persona exigida en WorkOne	6
<u>¿Reúno los requisitos para los beneficios?</u>	<u>7</u>
¿Cuánto dinero ganó en su período de base?	7
¿Por qué está desempleado?	9
¿Está usted capacitado, disponible y buscando activamente un trabajo de tiempo completo?	10
¿Qué es una oferta de trabajo adecuada?	10
<u>¿Cómo sabré si obtendré beneficios?</u>	<u>11</u>
Determinación de elegibilidad	12
Solicitud de notificación por correo postal de parte del solicitante	<u>14</u>
<u>¿Cuánto serán mis beneficios?</u>	<u>15</u>
¿Por cuánto tiempo recibiré beneficios?	15
¿Existe un límite para el monto total de mis beneficios?	15
¿Cuánto será mi pago semanal?	16
¿Cuál es el monto máximo de beneficios semanal?	16
¿Lo que debo de manutención de menores será deducido automáticamente de mis beneficios?	16
<u>Beneficios parciales</u>	<u>17</u>
Cómo se calculan los beneficios parciales	17
Exclusiones de beneficios parciales	17
<u>Cómo obtengo mi pago de beneficios</u>	<u>18</u>
Comprobante de solicitud	18
Información de búsqueda de trabajo	19
¿Cómo puedo obtener ayuda para buscar trabajo?	21
Después de tramitar su solicitud inicial	22
<u>¿Qué ocurre si no estoy de acuerdo con una decisión de beneficios?</u>	<u>25</u>
¿Cómo presento una apelación?	25
La audiencia ante un Juez de Derecho Administrativo	25
Si su empleador previo presenta una apelación	27
Si no puede asistir a una audiencia programada	27
Después de la audiencia	27
<u>Preguntas más frecuentes</u>	<u>28</u>
<u>Diagrama de flujo del proceso de los beneficios del seguro de desempleo</u>	<u>30</u>
<u>Glosario de términos y acrónimos</u>	<u>32</u>
<u>Para más información</u>	<u>34</u>

TAA Virtual Orientations

The screenshot shows the Indiana Department of Workforce Development (DWD) Virtual Orientations page. The page features a grid of 18 employer cards, each with a 'Watch the Orientation' button. Some buttons are highlighted in green and yellow, indicating available Spanish language options. The page includes a search bar, navigation menu, and a footer with system information.

Employer	Orientation Language Options
Altex-Mar	English
Baptist Health	English
Cambria Fabshop	English
Cenveo Worldwide	English
Dometic Corporation	English, Spanish
FXI, Inc. – Auburn Plant	English
MasterBrand Cabinets, Inc. – Jasper & Ferdinand, IN	English
Matthew Warren Spring Division	English
Medtronic PLC	English
Pittsburgh Glass Works, LLC	English
Regal Beloit	English
Standard Locknut LLC	English
Stanley Black and Decker	English, Spanish
The Corsi Group, Inc.	English
United Healthcare	English
United States Steel Corporation –	English
Winona PVD Coatings	English

Seguro de desempleo en Indiana

PREGUNTAS FRECUENTES para el solicitante por temas relacionados con COVID-19

Actualizado el 28 de junio de 2022

Índice

Sección A

- ¿Cómo tramito los beneficios?
- ¿Soy elegible para el seguro de desempleo regular?

Sección B

- Programa de Asistencia de desempleo pandémico (PUA)

Sección C

- Recertificación del Programa de Asistencia de desempleo pandémico

Sección D

- Emergencia pandémica de compensación (PEUC)

Sección E

- Asistencia Federal de Desempleo Pandémico (FPUC)

Sección F

- ¿Qué pasa después de que transmito mi solicitud para beneficios del seguro de desempleo?

Sección G

- Verificación de Identidad
- Robo de Identidad
- Otra información sobre posible fraude

Sección H

- ¿Qué ocurre si me niego a regresar al trabajo o rechazo una oferta de empleo?

Sección I

- Programa de Asistencia para salarios perdidos (LWA)

Sección J

- Otras Preguntas

Sección K

- Compensación por desempleo para personas con ingresos mixtos (MEUC)

Sección L

- Fin de los programas federales contra una pandemia

SUB RESEA Notification Letter

##Nombre de Solicitante ##

##CURRDATE####RECIPIENTADDRESS ##

Aviso de Obligación Para Informar al Solicitante Entrevista Posterior SUB RESEA

Estimado ##RECIPIENTFULLNAME##,

El Departamento de Desarrollo de la Fuerza Laboral de Indiana (DWD) y Centro Americano de Empleos (AJC) desean informar a los solicitantes de Indiana que todavía estamos aquí para ayudarlo con su viaje de reempleo. Usted ha sido seleccionado para participar en el programa Sub RESEA de Indiana, que da información de servicios de reempleo a los solicitantes de Indiana que todavía están desempleados después de 15 semanas de beneficios del seguro de desempleo.

Su entrevista SUB requerida está programada para:

##FECHA##: ##HORA##

##UBICACION ##

UBICACION

Por favor, planee llegar 10 minutos antes para ayudar con el proceso de registro de entrada. Si no puede asistir en esta fecha, debe llamar a la oficina al número que aparece a continuación para reprogramar.

Sus beneficios del Seguro de Desempleo SE DETENDRÁN si no asiste esta Orientación.

Tareas de entrevista antes de su cita SUB:

Las siguientes tareas deben completarse antes de su entrevista individual:

Si necesita ayuda con cualquiera de las siguientes tareas, visite el Centro WorkOne y hable con el personal antes de su cita para la entrevista SUB.

1. Actualice su registro en IndianaCareerConnect.com (ICC). Si necesita ayuda para iniciar su sesión, comuníquese con su coordinador local de WorkOne RESEA utilizando la información de contacto al final de esta carta.
2. Actualice su currículum en IndianaCareerConnect.com. (El currículum debe ser visible en línea para los empleadores).
3. Completar todas las tareas enumeradas al inicial y seguimiento en su Plan Individual de Reempleo.

Traer con usted los siguientes artículos a su cita:

1. Registros de búsqueda de trabajo durante las últimas 4 semanas o traer una copia impresa de los registros completados en línea en unemployment.in.gov.
2. Identificación con foto válida

Si tiene alguna pregunta sobre los requisitos para continuar elegibilidad para los beneficios del Seguro de Desempleo, revise el Manual para los Solicitantes que se puede encontrar en www.unemployment.in.gov.

Esperamos poder ayudarlo con sus necesidades de reempleo.

Sinceramente,

Contacto principal:

Teléfono: EXT:

Correo Electrónico:

Department of Labor (DOL)
Veterans' Employment & Training Service (VETS)

Jobs for Veterans State Grants (JVSG) Program Fact Sheet

Overview: The Jobs for Veterans State Grants (JVSG) program provides federal funding, through a formula grant, to 54 State Workforce Agencies (SWAs) to hire dedicated staff to provide individualized career and training-related services to veterans and eligible persons with significant barriers to employment and to assist employers fill their workforce needs with job-seeking veterans.

Program Staff:

The JVSG program supports the Disabled Veterans' Outreach Program (DVOP) specialist position, Local Veterans' Employment Representative (LVER) staff, and Consolidated Position staff. DVOP specialists provide individualized career services to veterans with significant barriers to employment, with the maximum emphasis directed toward serving veterans who are economically or educationally disadvantaged. Veterans with barriers include homeless veterans and vocational rehabilitation clients. Local Veterans' Employment Representatives conduct outreach to employers and business associations and engage in advocacy efforts with hiring executives to increase employment opportunities for veterans and encourage the hiring of disabled veterans. Consolidated Position staff serve in a dual role as DVOP and LVER.

Program Authorization: Title 38, United States Code, Section 4102A (b) 5 (38 U.S.C. §4102A(b)5) authorizes funds provided to each state to staff and support DVOP specialists, LVER staff, and the reasonable costs associated with such representatives, including travel to the National Veterans' Employment and Training Services Institute (NVTI). DVOP and LVER roles and responsibilities are defined in 38 U.S.C. §4103A for DVOP specialists and 38 U.S.C. §4104 for LVER staff.

Program Funding Allocation: Most State Workforce Agencies' funding allocation is determined by a ratio that reflects the total number of veterans seeking employment in a given state to the total number of veterans seeking employment in all states. Several states receive a minimum amount of funding to ensure that a certain level of staff can be maintained, particularly in states with remote pockets of Native Americans and a large number of sparsely populated rural counties.

Program Administration: Every five years, State Workforce Agencies submit a multi-year JVSG state plan or every four years for states that opt to submit a combined Workforce Innovation Opportunity Act (WIOA) state plan. State plans which generally includes a narrative description of the populations of veterans that will receive targeted services, provisions for priority of service for veterans and other eligible persons and performance goals. Each year thereafter, states submit an Annual Funding Modification to their approved state plan.



Eric J. Holcomb, *Governor*
 Frederick D. Payne, *Commissioner*

To: Indiana's Workforce Investment System

From: Indiana Department of Workforce Development

Date: August 30, 2019

Subject: DWD Policy 2019-03
 Required Roles and Responsibilities of Disabled Veterans' Outreach Program (DVOP) Specialist and Local Veterans' Employment Representative (LVER) staff in Indiana Department of Workforce Development's integrated WorkOne American Job Center Indiana offices.

Purpose

To explain required roles and responsibilities for Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff in Indiana Department of Workforce Development's (DWD) integrated WorkOne American Job Center Indiana offices.

Rescission

- DWD Policy 2015-09 Required Roles and Responsibilities of Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) specialists in Indiana Department of Workforce Development's Integrated WorkOne Offices.

References

- 38 United States Code, Chapter 42, Section 4211 and Section 4215
- Jobs for Veterans Act, Public Law 107-288 (Nov. 7, 2002)
- Federal Register Part VIII, Department of Labor, Veterans' Employment and Training Service, 20 CFR Part 1010, Priority of Service for Covered Persons (Dec. 19, 2008)
- Public Law 112-56-Nov. 21, 2011; Title II-Vow to Hire Heroes; Subtitle C-Improving the Transition of Veterans to Civilian Employment
- The Consolidated Appropriations Act of 2014
- Veteran Program Letter 03-14 Jobs for Veterans State Grants (JVSG) Program Reforms and Roles and Responsibilities of American Job (AJC) Staff Serving Veterans
- Veteran Program Letter 03-14 change 1 Expansion and Clarification of Definition of Significant Barriers to Employment for Determining Eligibility for the Disabled Veterans' Outreach Program (DVOP)
- Veteran Program Letter 03-14 Change 2 Expansion and Clarification of Homeless Definition as a Significant Barrier to Employment (SBE)
- Veteran Program Letter 07-14 American Job Center (AJC) participation in Capstone Activities and

- other Outreach to Transitioning Service Members
- Veteran Program Letter 03-16 Enrollment of Homeless Veterans Program Participants into a Workforce Innovation and Opportunity Act (WIOA) Workforce Program at an American Job Center (AJC)
- Veteran Program Letter 01-18 Exception of Jobs for Veterans State Grant (JVSG), Local Veterans' Employment Representative (LVER) Duty Roles
- Veteran Program Letter 03-19 Designation of Additional Populations Eligible for Services from Disabled Veteran's Outreach Program Specialist
- Veteran Program Letter 06-19 Homeless Veterans' Reintegration Program Participant Eligibility

Content

Definitions

- **Eligible Veteran**, as defined by the United States Code Title 38 Veterans' Benefits, Chapter 4211, paragraph (4), subparagraph (A) (B), is a person who:
 - Served on active duty for a period of more than 180 days and was discharged or released with other than a dishonorable discharge;
 - Was discharged or released from active duty because of a service-connected disability; or as a member of a reserve component under an order to active duty pursuant to section 12301(a), (d), or (g), 12302, or 12304 of title 10, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge.
- **Eligible Spouse**, as defined by the United States Code Title 38 Veterans' Benefits, Chapter 4101, means:
 - The spouse of any person who died of a service-connected disability;
 - The spouse of any member of the Armed Forces serving on active duty who, at the time of application for assistance under this chapter, is listed, pursuant to section 556 of title 37 and regulations issued thereunder, by the Secretary concerned in one or more of the following categories and has been so listed for a total of more than ninety days:
 - Missing in action,
 - Captured in line of duty by a hostile force, or
 - Forcibly detained or interned in line of duty by a foreign government or power; or
 - The spouse of any person who has a total disability permanent in nature resulting from a service-connected disability or the spouse of a veteran who died while a disability so evaluated was in existence.
- **Additional Service Populations**, as defined in The Consolidated Appropriations Act of 2014 and VPL 03-19, are populations receiving support services funded by Jobs for Veteran State grants (JVSG) grants under this Act. Those populations include:
 - Transitioning members of the Armed Forces who have been identified as in need of individualized Career services;
 - Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities or warrior transition units; and
 - The spouses or other family caregivers of such wounded, ill, or injured members.

- **Family caregiver**, with respect to an eligible veteran, means a family member who is a caregiver of the veteran.
- **Caregiver** with respect to an eligible veteran, means an individual who provides personal care services to the veteran.
- **Family member**, with respect to an eligible veteran, means an individual who—
 - Is a member of the of the veteran’s family, including—
 - A parent;
 - A spouse;
 - A child;
 - A step-family member; or
 - An extended family member; or
 - Lives with, but is not a member of the family of the veteran.
- **Transitioning Service Members (TSM)** according to VPL 07-14, are those members falling within the three categories below and are therefore eligible for DVOPs services:
 - Service members who receive a warm handover, or who produce a DD-2958 signed by their commander documenting that they have not met Career Readiness Standards;
 - Transitioning service members ages 18-24, regardless of whether they meet Career Readiness Standards; or
 - Active duty service members being involuntarily separated through a Service reduction- in-force.
- **Vietnam Era Veteran**, pursuant to 38 U.S.C. 4211, the term “Veteran of the Vietnam Era” is an eligible veteran any part of whose active military, naval, or air service was during the Vietnam Era. 38 U.S.C. 101(29) defines “Vietnam-era” to mean the period beginning on February 28, 1961, and ending on May 7, 1975, in the case of a veteran who served in the Republic of Vietnam during that period, and the period beginning on August 5, 1964, and ending on May 7, 1975, in all other cases.”

General Roles and Responsibilities of WorkOne Staff Serving Veterans

- **Welcome Team Staff** – First, identify those eligible veterans or eligible spouses with significant barriers to employment (SBE) and/or other additional service population criteria eligible to be served by Disabled Veterans’ Outreach Program specialist (DVOPs) as found in current VPLs. Then direct those eligible veterans or eligible spouses with SBEs and or other additional service population criteria to the (DVOPs) for assistance with intensive services (Individualized Career Services) and case management. The DVOP is not to perform intake duties or point of entry functions for non-SBE veterans or any functions normally assigned to other AJC partner staff or other automated procedures, thereby detracting from their ability to provide services, case management, or outreach duties related to meeting the employment needs of eligible veterans and eligible spouses. Additionally, under no circumstances will the LEVR perform any of these functions. In the event that a DVOP Specialist is not available, the veteran or spouse should be referred to the appropriate Wagner-Peyser or Workforce Innovation and Opportunity Act (WIOA) staff in addition to scheduling or referring to an available DVOP specialist by appointment. Under normal operating circumstances, all WorkOne customers are greeted by the welcome team and moved on to the appropriate staff for assistance.

- **Wagner-Peyser Staff** — The majority of veterans should be served by Wagner-Peyser or WIOA staff rather than the JVSG Veteran staff.
- **Veteran staff (DVOPs)** — Efforts of veteran staff should be focused on veteran customers with Significant Barriers to Employment (SBE) in accordance with Veterans Program Letter 03-14 and 03-14, Change 1 and Change 2, and VPL 03-19. The six significant barriers to employment (SBE) and six other associated factors for DVOPs services, as identified by the Department of Labor are:
 1. A special disabled or disabled veteran, defined in 38 U.S.C § 4211(1) and (3);
Special disabled and disabled veterans are those:
 - who are entitled to compensation (or who would be entitled to compensation but for the receipt of military retired pay) under laws administered by the Secretary of Veterans Affairs; or,
 - were discharged or released from active duty because of a service connected disability;
 2. A Homeless person, as defined in Section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a) and (b), as amended);
 3. A recently-separated service member, as defined in 38 U.S.C § 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months, i.e. the term of unemployment over the previous 12 months remains 27 weeks; however, the requirement of 27 consecutive weeks is eliminated;
 4. An offender, as defined by WIOA Section 3 (38) 1, who is currently incarcerated or who has been released from incarceration, i.e. the expanded definition of SBE includes any eligible veteran or eligible spouse who is currently or was formerly incarcerated, removing the “within the last 12 months” requirement;
 5. Lacking a high school diploma or equivalent;
 6. Low-income individual (as defined by WIOA Section 3 (36));
 7. A Veteran between the ages of 18-24;
 8. A Veteran Affairs Vocational Rehabilitation and Employment Chapter 31 Veteran;
 9. A Transitioning Service Member in need of intensive services;
 10. Wounded, ill, or injured Service Member receiving treatment at a military facility, or Warrior Transition Unit (MTF/WTUS); or
 11. Spouses and family care-givers of such wounded, ill, or injured service members.
 12. Served any part of active duty military, naval, or air service during the Vietnam era (02/28/1961 – 05/07/1975).

Disabled Veterans’ Outreach Program Specialist Roles

In Veterans’ Program Letters 03-14, Ch.1 and Ch.2, and 03-19, DVOP specialists facilitate individualized career services to veterans with barriers to employment and/or special training needs which include:

- Conducting a comprehensive assessment (minimum requirement)
- Developing an individual employment plan that is documented (minimum requirement)
- Chapter 31 Vocational Rehabilitation & Employment Case Management
- Coordinating supportive services
- One-on-One Career Counseling

- Providing short term pre-vocational services
- Group Counseling

Case Management and Tracking

The DVOP specialist is the DWD case tracker for veterans in the United States Department of Veterans Affairs Vocational Rehabilitation and Employment Program (Title 38, Code of Federal Regulations, and Chapter 31). This program requires extensive follow-up and the DVOP specialist must be allowed sufficient time to do the case management and intensive services to meet these requirements. The DVOP specialist should work closely with the LVER & WorkOne Business Service Team (BST) to ensure that veterans in Chapter 31 programs who are “job ready” receive priority in their job search and job referrals, as determined by the Vocational Rehabilitation Counselor (VRC) at the VA.

In accordance with Department of Labor Veterans' Employment and Training Service (DOL-VETS) Technical Assistance Guide dated December 2008, DVOPs are required to complete a service every two weeks for the Chapter 31 Veterans that they are case managing. Typically, this service will also be recorded in the current State client tracking systems under the Chapter 31 Case Management selection.

The DVOP specialist is the AJC expert on programs available to assist SBE veterans in improving their skills so they can take the next step up in their careers. This would include workshops where the DVOPs is able to participate in, such as a LVER or AJC sponsored employment workshop where SBE or additional service population eligible may exist. The DVOP specialist is required to do outreach to target all veterans. DVOPs will coordinate outreach activities with their formal and functional managers to ensure maximum efficiency of the event.

In the event that a DVOP specialist does not have a full case-load of eligible veterans and eligible spouses, the DVOP specialist may perform additional outreach activities. For example, at such locations:

- Vocational Rehabilitation & Employment (VR&E) Services
- Homeless Veterans Reintegration Program (HVRP)
- VA Medical and other Centers
- Veterans' Administration Community Based Outpatient Clinic (CBOC)
- Homeless shelters
- Civic and service organizations
- Community Stand Downs
- Military installations
- WIOA partners
- State Vocational Rehabilitation Services
- County Service Veterans Service Officer

Case Noting

Case notes for veterans in the Chapter 31 program are confidential and will be kept in the current State of Indiana client tracking system. Specific veterans' disability data may not be recorded in any computer system. The only data that can be recorded is the percentage of disability rated by the US Department of Veterans Affairs.

Rapid Response for Dislocated Veterans

At a minimum, the DVOP should be a part of the Rapid Response Team at selected Rapid Response events for dislocated veterans, ensuring that SBE veterans are offered JVSG services.

Local Veterans' Employment Representative (LVER) Roles

In the Veterans' Program Letter 03-14 and 01-18, the following are the mandated functions for the Local Veterans' Employment Representative Staff:

1. As an integral part of the State's Labor Exchange System, LVER staff work with employers to promote veterans as job seekers who have highly marketable skills and experience.
2. LVER staff advocate for veterans to gain employment and training opportunities with business, industry, and community-based organizations. To accomplish this, LVER staff participates in a variety of outreach activities including, but not limited to:
 - a. Planning and participation in job fairs.
 - b. Coordinating with unions, apprenticeship programs, and business organizations to promote employment and training opportunities for veterans.
 - c. Promoting credentialing and training opportunities for veterans with training providers and licensing agencies.
3. LVER staff establishes, facilitates, and/or maintains regular contact with employers to include federal contractors. They should coordinate with employer relations representatives as part of the WorkOne system to include veterans in their marketing efforts.
4. LVER staff provides and facilitates a full range of employment, Veteran Program and Priority of Service training, and placement services to meet the needs of priority veterans in targeted categories identified and approved in the WIOA Combined State Plan.
These services may include, but are not limited to:
 - Conducting job search assistance workshops in conjunction with employers.
 - Providing job development opportunities.
5. LVERs serving in Federally Declared Major Disaster areas by the President of the United States and where VETS Assistant Secretary has determined circumstances appropriate are authorized temporary exception to the restricted LVER roles and responsibilities as outlined in VPL 03-14 and may provide direct individualized career services to disaster-affected veterans.

The LVER should be integrated into the WorkOne Employment Team or Business Services Team (or equivalents). The difference between the LVER and any other member of the team is that the LVER advocates for veterans for employment and training opportunities with businesses, industries, unions, and apprenticeship programs. They may ask employers specifically to seek veterans for positions in their companies. Optimally, the employer would target specific positions for veterans with certain skills (based on the veterans' military training/military occupational specialty). Under no circumstances will the LVER provide related services to non-veteran customers unless the customer is an eligible spouse covered by priority of service.

The LVER staff must be able to inform the community of Veteran services. LVER staff should be encouraged to attend meetings of the local Chamber of Commerce, area Unions, and Hiring Events to promote all the WorkOne services; both as a networking tool and for the opportunity to speak about veterans' programs.

Joint Responsibilities of DVOPs and LVERs

U.S. DOLVETS Homeless Veterans' Reintegration Program (HVRP)

To better serve the SBE homeless Veteran population, the HVRP and the WorkOne American Job Center Indiana teams will collaborate together to:

1. Partner with AJC staff to properly enroll all HVRP participants, and
2. Ensure a staff member (WIOA or DVOPs) is present during the enrollment process to facilitate accurate reporting and strong working relationships.

It is also encouraged for HVRP awarded grantees and local AJC staff to share information on their services and ensure new staff members are fully trained on AJC services and enrollment requirements. Therefore, when appropriate, DVOPs will be assigned to a current, local HVRP awarded grantee to facilitate this partnership and co-enrollment. When a DVOP is unavailable, a WIOA employee may be selected to fill this role. The AJC staff member assigned to facilitate co-enrollment will also be the primary point of contact to ensure HVRP grant requirements are accurately reflected in Indiana Career Connect. Additionally, LVERs will combine employment efforts with the identified AJC facilitator to connect co-enrolled HVRP clients to Employers and employment opportunities within the workforce envelope.

Outreach Accountability

In order to maintain accountability for time spent on outreach, each LVER and DVOPs shall report the results of their outreach activities, including but not limited to travel logs in writing via e-mail or Outlook Calendar Shares to their WorkOne local management staff. If necessary, copies of these documents and schedules will be provided to formal State Managers, and/or functional managers when applicable.

These reports will be used by the LVER staff, Regional Operators, and the Workforce Development Boards (WDB), to produce the required quarterly reports for the State Veterans Coordinator and U.S. Department of Labor Veterans' Employment and Training Services as required in Public Law 107-288 and VPL 01-15. Outreach activities will be reviewed by supervisors and those that are determined by the management team to be unproductive may be discontinued.

National Veterans Training Institute (NVTI)

All DVOPs and LVERs are required to attend veteran related courses at NVTI within 18 months of assignment or hire. Typically, most veteran representatives will attend at least two courses offered by NVTI. In some instances, the DWD State Veterans Coordinator may elect to send veterans' representatives to additional courses based on career development.

Indiana Seamless Transition Program

In some instances, LVERs and DVOPs will be called upon to assist with the State of Indiana Seamless Transition Program for State National Guard and Military Reservists returning from deployment. This may include the Yellow Ribbon Program for returning deployed service members.

Negotiated Performance Measures

The State of Indiana Veterans' Program negotiates Performance Targets with the U.S. Department of Labor Veterans' Employment and Training Service (DOLVETS) for the JVSG program which uses data metrics retrieved from Participant Individual Record Layout (PIRL) to report outcomes. The following entities are charged with the responsibility of meeting the VETS Negotiated Performance

Targets: Indiana Department of Workforce Development, the State's regional Workforce Development Boards (WDBs), the State Workforce Innovation Council (the State's Workforce Investment Board), Regional Workforce.

Effective Date

Immediately

Ending Date

Upon rescission.

Contact for Questions

policy@dwd.in.gov

Action

To ensure all eligible veterans are identified and provided appropriate services, local areas are to ensure this policy is implemented in a timely manner within the workforce region and is adhered to by JVSG and WorkOne staff.



To: Indiana's Workforce Investment System

From: Regina Ashley, Chief Strategy Officer *RA*
 Josh Richardson, Chief Operating Officer *JDR*

Date: May 4, 2016

Subject: DWD Policy 2015-08
 Priority of Service for Veterans and Eligible Spouses in Indiana
 Department of Workforce Development's Integrated WorkOne Offices

Purpose

This policy addresses Priority of Service for Veterans and Eligible Spouses under the Workforce Innovation and Opportunity Act (WIOA).

Rescission

DWD Policy 2009-01 Priority of Service for Veterans and Eligible Spouses and Required Roles and Responsibilities of Disabled Veterans' Outreach Program (DVOP) Specialists and Local Veterans' Employment Representatives (LVER) in Indiana Department of Workforce Development's Integrated WorkOne offices

References

- 38 United States Code, Chapter 42, Section 4211 and Section 4215
- Federal Register Part VIII, Department of Labor, Veterans' Employment and Training Service, 20 CFR Part 1010, Priority of Service for Covered Persons (Dec. 19, 2008)
- Jobs for Veterans Act, Public Law 107-288 (Nov. 7, 2002)
- Veterans' Program Letter (VPL) No. 07-09, "Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in Whole or in Part by the U.S. Department of Labor"
- USDOL/Employment and Training Administration (ETA) Training and Employment Guidance Letter (TEGL) No. 10-09, "Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in Whole or in Part by the U.S. Department of Labor"

Michael R. Pence, *Governor*
 Steven J. Braun, *Commissioner*

10 N Senate Avenue
 Indianapolis, IN 46204-2277
www.IN.gov/dwd

Phone: 317.232.7670
 Fax: 317.233.4793

An Economic Development Partner

- Training and Employment Notice (TEN) 15-10a, “A Protocol for Implementing Priority of Service for Veterans and Eligible Spouses”

Content

Definitions

- **Covered Person**-A veteran who is eligible or the spouse of an eligible veteran who is entitled to receive priority of service as a person who has served at least one day in the active military, naval, or air service and who was discharged or released from service under any condition other than a condition classified as dishonorable. This definition includes Reserve units and National Guard units activated for Federal Service.
- **Qualified job training program** -Any workforce preparation, delivery program, or service that is directly funded, in whole or in part, by the Department of Labor and includes the following:
 - Any such programs or services that use technology to assist individuals to access workforce development programs (such as job and training opportunities, labor market information, career assessment tools, and related support services).
 - Any such program or service under the public employment system, One-stop Career Centers, the Workforce Innovation and Opportunity Act of 2015, a demonstration or other temporary program, and/or those programs implemented by States or local service providers based on Federal block grants administered by the Department of Labor.
 - Any such program that is a workforce program targeted to specific groups.
- **Veteran**- A person who served at least one day in the active military, naval, or air service and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2).
- **Active duty**- Full-time duty in the Armed Forces, other than active duty for training. This definition of “active service” does not include full-time duty performed strictly for training purposes, (i.e., that which often is referred to as “weekend” or “annual” training), nor does it include full-time active duty performed by National Guard personnel who are mobilized by State rather than Federal authorities. (State mobilizations usually occur in response to events such as natural disasters.)
- **Armed Forces**- United States Army, Navy, Marine Corps, Air Force, and Coast Guard.
- **Eligible spouse**- means the spouse of any of the following:
 - Any veteran who died of a service-connected disability;
 - Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - Missing in action;
 - Captured in line of duty by a hostile force; or
 - Forcibly detained or interned in line of duty by a foreign government or power;
 - Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
 - Any veteran who died while a disability was in existence.
 - **NOTE:** A spouse whose eligibility is derived from a living veteran or service member would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level). Similarly, for a

spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

Priority of Service

WorkOne offices are required to ensure that Priority of Service is observed. To further improve service to veterans, the Priority of Service to Veterans and Eligible Spouses Federal Regulations, effective January 19, 2009, provides specific guidance on how One-stop Career Center providers, Wagner-Peyser staff, DVOPs, and LVERs are to serve veterans with respect to priority of service.

Veteran and eligible spouse customers should be identified upon entry at a WorkOne and allowed to move to the front of the waiting line. To assist with identifying veterans and eligible spouses, Priority of Service signs have been developed and are posted in all WorkOne offices where veterans are served. Signs are framed and displayed in a manner where the public and especially veteran and eligible spouse customers can easily see them. In accordance with the priority of service sign, eligible veterans and eligible spouses should notify staff upon entry into the facility. Typically, this will be near the entry point. Customers with visual impairments must be asked if they are a veteran or eligible spouse.

Verification

- Basic Career Services – No source documentation needed for eligibility when these services are accessed or provided unless the individual who self-identifies as a veteran or eligible spouse:
 - Is to immediately undergo eligibility determination and be registered or enrolled in a program; and
 - The applicable federal program rules require verification of a veteran or eligible spouse status at that time.
- Programs or Services that cannot rely on self-attestation – verification only needs to occur at the point at which a decision is made to commit outside resources to one individual over another for these programs or services.
 - When verification of eligibility is required in these instances, a veteran or eligible spouse should be enrolled, provided immediate priority, and be permitted to follow-up subsequently with any required verification of his or her status as a veteran or eligible spouse.
- Labor Exchange System Reporting— Federal regulations require that all individuals who are veterans be identified as veterans in the Wagner-Peyser labor exchange system, regardless of eligibility requirements.
- Verification of veteran status or eligible spouse—When verification is required, the following official documents may be used:
 - A DD 214 (issued following separation from active duty);
 - An official notice issued by the Department of Veterans Affairs that establishes entitlement to a disability rating or award of compensation to a qualified dependent;
 - An official notice issued by the Department of Defense that documents the eligibility of an individual, based on the missing or detained status of that individual's active duty spouse; or
 - An official notice issued by a State veterans' service agency that documents veteran status or spousal rights, provided that the State veterans' service agency requires Federal documentation of that information.

Implementing Priority of Service

As defined in Section 2(a) of the JVA (38 U.S.C. 4215(a)), **priority of service means**, with respect to any qualified job training program, that a covered person shall be given priority over a non-covered person for the receipt of employment, training, and placement services provided under that program, notwithstanding any other provisions of the law.

Priority in the context of providing priority of service to veterans and other covered persons in qualified job training programs means the right to take precedence over non-covered persons in obtaining services. Depending on the type of service or resource being provided, taking precedence may mean:

- The covered person receives access to the service or resource earlier in time than the non-covered person; or
- If the service or resource is limited, the covered person receives access to the service or resource instead of or before the non-covered person.

Priority of service applies to every qualified job training program funded, in whole or in part, by the Department of Labor, including:

- Any such program or service that uses technology to assist individuals to access workforce development programs (such as job and training opportunities, labor market information, career assessment tools, and related support services); and
- Any such program or service under the public employment service system, One-stop Career Centers, the Workforce Innovation and Opportunity Act, a demonstration, or other temporary program; any workforce development program targeted to specific groups; and those programs implemented by States or local service providers based on Federal block grants administered by the Department.

Identifying and Informing Covered Persons

Local Workforce Development Boards must develop and include in their strategic local plan policies implementing priority of service for the local One-Stop Career Centers and for all qualified job training programs delivered through the State's workforce system. These policies must establish processes to ensure that covered persons are identified at the point of entry so that covered persons are able to take full advantage of priority of service. These processes shall ensure that covered persons are aware of:

- Their entitlement to priority of service;
- The full array of employment, training, and placement services available under priority of service; and
- Any applicable eligibility requirements for those programs and/or services.

Point of entry may include reception through a One-stop Career Center established pursuant to the Workforce Innovation and Opportunity Act, as part of an application process for a specific program, or through any other method by which covered persons express an interest in receiving services, either in-person or virtually.

Monitoring for Compliance with Priority of Service

The U. S. Department of Labor will monitor recipients of funds for qualified job training programs to ensure that covered persons are made aware of and provided priority of service. Monitoring will be performed jointly by the Veterans' Employment and Training Service (VETS) and the DOL agency

responsible for the program's administration and oversight. A recipient's failure to provide priority of service to covered persons will be handled in accordance with the program's established compliance review processes. In addition to the remedies available under the program's compliance review process, a recipient may be required to submit a corrective action plan to correct such failure.

Effective Date

Immediately.

Ending Date

Upon rescission.

Contact for Questions

policy@dwd.in.gov



To: Indiana's Workforce Investment System

From: Indiana Department of Workforce Development (DWD)

Date: February 28, 2022

Subject: DWD Policy 2019-04, Change 1
Workforce Innovation and Opportunity Act (WIOA) Title I Adult Priority of Service

Purpose

To provide guidance on the WIOA Title I Adult Program Priority of Service (POS) requirements for individualized career services and training services.

Change Summary

Major changes include the following:

- Addition of the United States Department of Labor (DOL) established POS goal (75%) and identified minimum priority rate (50.1%)
- Update to the "Additional Priority of Service Groups" section regarding POS calculations
- Clarification to the "Priority Order of Service Provision" section to better align with TEGL 7-20
- Addition of a POS Calculation Table showing which priority groups count toward the minimum rate requirement
- Addition of the Locally Established POS Groups Data Entry section
- Development of a step-by-step data entry technical assistance document for locally established POS groups for DWD's case management system

Rescission

- DWD Policy 2019-04, *WIOA Title I Adult Priority of Service*

References

- WIOA Sections 3, 134
- 20 CFR 680.600, 680.650, 675.300
- 38 U.S.C. 3500, 38 U.S.C. 4213

- *TEGL 10-09 Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in whole or in part by the U.S. Department of Labor (DOL), November 10, 2009*
- *TEGL 23-19 Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor (DOL) Workforce Programs*
- *TEGL 26-13 Impact of the U.S. Supreme Court's Decision in United States v. Windsor on Eligibility and Services Provided Under Workforce Grants Administered by the Employment and Training Administration*
- *TEGL 7-20 Effective Implementation of Priority of Service Provisions for Most in Need Individuals in the Workforce Innovation and Opportunity Act (WIOA) Adult Program*
- *TEGL 19-16 Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules*
- *WIOA Desk Reference: Priority of Service for WIOA Adult Funds¹*
- *WIOA Desk Reference: Adult and Dislocated Worker Key Resources - Special Populations²*

Content

To prioritize services for those who have the most need for and who would benefit from employment and training services, WIOA sec. 134(c)(3)(E) identifies three groups with barriers to employment and requires priority be given to these individuals. Priority of service must be given to public assistance recipients, other low-income individuals, and individuals who are basic skills deficient when providing individualized career services and training services using WIOA Title I Adult program funds.

This priority requirement must be followed in the local area regardless of the amount of funds available for providing services.

Priority of Service Groups and Eligibility

Priority status for WIOA Title I Adult participants is determined during eligibility and enrollment. Status does not change during the period of participation. When providing individualized career and training services in the Title I Adult program, local areas must give priority of service to participants who receive public assistance, are low-income individuals, or are basic skills deficient. The three priority groups are described below. Acceptable documentation for verifying eligibility is provided in Attachment A.

Recipients of Public Assistance, defined by WIOA sec. 3(50), includes individuals who receive cash payments from Federal, State, or local government for which eligibility is determined by a needs or income test.

Low-Income Individuals, defined by WIOA sec. 3(36), describes individuals who meet one of the following criteria³:

¹ <https://ion.workforcegps.org/resources/2017/10/05/14/01/WIOA-Desk-Reference>

² [https://ion.workforcegps.org/resources/2017/03/09/11/25/Special Populations - Adult and Dislocated Worker Populations](https://ion.workforcegps.org/resources/2017/03/09/11/25/Special%20Populations%20-%20Adult%20and%20Dislocated%20Worker%20Populations)

³ See 20 CFR §675.300 for the definition of “family” and TEGL 26-13 regarding lawful same-sex marriages.

- Receives, or in the past six months has received, or is a member of a family that is receiving or has received in the past six months, assistance through the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), Supplemental Security Income (SSI), or a state or local income-based public assistance program; or
- In a family⁴ with total family income that does not exceed the higher of:
 - the poverty line or
 - 70 percent of the Lower Living Standard Income Level (LLSIL); or
- A homeless individual⁵/homeless child/youth⁶; or
- Receives or is eligible to receive a free or reduced-price lunch⁷; or
- A foster child on behalf of whom state or local government payments are made⁸; or
- An individual with a disability whose own income meets the income requirements above but is a member of a family whose total income does not meet this requirement.

Basic Skills Deficient, defined by WIOA sec. 3(5), describes an individual who meets at least one of the following criteria as basic skills deficient:

- Unable to compute or solve problems; or
- Read, write; or
- Speak English, at a level necessary to function on the job, in the individual's family, or in society. (DOL includes English language learners in the basic skills deficient group.)

DWD provides the following criteria for determining basic skills deficiency. An individual must meet at least one of the following:

- Lacks a high school diploma or equivalency and is not enrolled in secondary education; or
- Scores 8.9 or below on the Tests of Adult Basic Education (TABE);⁹ or
- Enrolled in a Title II Adult Education/Literacy program: or
- Has poor English language skills (includes English Language Learners); or
- The individual's case manager makes observations of deficient functioning and records thorough justification in a case note.

Eligibility Determinations for Veterans

Veterans and eligible spouses of veterans continue to receive priority of service for all job training programs funded by the DOL, including WIOA programs.

When determining priority of service eligibility for WIOA Title I Adult employment or training programs, the following shall be disregarded in past income calculations:¹⁰

⁴ 20 CFR § 675.300.

⁵ As defined in section 41403(6) of the Violence Against Women Act of 1994.

⁶ As defined under section 725(2) of the McKinney-Vento Homeless Assistance Act. Applies to POS if the youth is also being served by the WIOA Adult program.

⁷ Under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.). Applies to POS if the youth is also being served by the WIOA Adult program.

⁸ Applies to POS if the youth is also being served by the WIOA Adult program.

⁹ Or an equivalent score on a DWD-approved alternate assessment.

¹⁰ In accordance with 38 U.S.C. 4213.

- Military pay and allowances received while serving on active duty.
- Compensation for service-connected disability or death or vocational rehabilitation.
- Benefits for education and training services funded by the Department of Veterans Affairs (VA).
- Compensation received by an eligible dependent or indemnity compensation for service-connected deaths.
- Educational assistance for eligible dependents and survivors of veterans under 38 U.S.C. 3500.

WIOA program operators may not require veterans or their spouses to exhaust their entitlement to VA-funded training benefits prior to allowing them to enroll in WIOA-funded training.

Priority of Service Goal and Minimum Rate

DOL has established the goal that at least 75 percent of the participants in the WIOA Title I Adult program who receive individualized career and training services are to be from at least one of the priority groups. DOL expects the POS rate will be no lower than 50.1 percent.¹¹ DOL intends to phase-in¹² the state-level goal, with encouragement to states to consider establishing additional benchmarks for local areas as a way to recognize whether priority is being provided to these populations.¹³ DWD is continuing to evaluate local level benchmarks and will provide additional guidance when available.

Additional Priority of Service Groups¹⁴

The Governor and/or the local Workforce Development Boards (WDB) may establish a process that also gives priority to other individuals eligible to receive such services, provided that it is consistent with priority of service for veterans (see 20 CFR § 680.650) and the priority provisions of WIOA sec. 134(c)(3)(E). Any additional priority groups identified by the Governor or local WDBs should be reflected in the WIOA State Plan, as well as the Local Area Plan(s).¹⁵

Priority populations established by the Governor and/or local WDBs should have a lower priority than the WIOA Adult or Veteran priority populations established in statute. The provision of services to priority populations established by the Governor and/or local WDBs will not impact the statutory priorities for the WIOA Adult or Veteran priority populations. Though not relevant for the 50.1 percent minimum, priority populations established by the Governor and/or local WDBs will be taken into consideration in progress toward the 75 percent goal.¹⁶

Locally Established POS Groups Data Entry

Once locally established priority groups have been identified, policies/processes have been developed, and the local plan updated, local areas must ensure the locally established priority group is appropriately documented within the DWD's case management system. Please see DWD TA *Locally Established POS Group Data Entry Instructions* for step-by-step data entry guidance.

¹¹ Per TEGL 7-20.

¹² Initial phase-in had been expected to occur during PY20. DWD anticipates further guidance from DOL due to pandemic.

¹³ Per TEGL 7-20

¹⁴ 20 CFR § 680.600(c).

¹⁵ Indiana's WIOA State Plan identifies Target Populations, but no determination has been made about service priority.

¹⁶ Additional resources: <https://ion.workforcegps.org/resources/2017/10/05/14/01/WIOA-Desk-Reference> and https://ion.workforcegps.org/resources/2017/03/09/11/25/Special_Populations_-_Adult_and_Dislocated_Worker_Populations.

Priority Order of Service Provision

As described in TEGL 19-16, when programs such as the WIOA Title I Adult program are statutorily required to provide priority for a particular group of individuals, priority must be provided in the specific order listed below. Veterans and eligible spouses of veterans continue to receive priority of service in all DOL-funded training programs. Veterans and their spouses must still meet the eligibility criteria for the WIOA Adult program.

Priority for the WIOA Title I Adult program MUST be provided in the following order:

- 1) To veterans and eligible spouses who are included in the groups given statutory priority for WIOA Adult formula funding. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient receive first priority for services with WIOA Adult formula funds for individualized career services and training services.
- 2) To individuals who are not veterans or eligible spouses of veterans, but are a recipient of public assistance, other low-income individuals, or individuals who are basic skills deficient.
- 3) To veterans and eligible spouses who are not included in WIOA's priority groups. Veterans and eligible spouses who are not included in a WIOA priority group but meet Title I Adult program eligibility.
- 4) To priority populations established by the Governor and/or Local WDB.
- 5) To other individuals who are not included in any priority group but meet WIOA Title I Adult program eligibility.

Priority of Service Calculation¹⁷

The Veteran and Adult priority groups (Public Assistance, Low Income and Basic Skills Deficient) count towards the minimum priority of service (POS) requirement of 50.1 percent. Additional groups established by Governor, the Governor's Workforce Cabinet (GWC) and/ or LWDBs will be taken into consideration towards the 75% POS benchmark. The table below depicts how DWD calculates this information, which is by adding all the "included" groups together (numerator) and the dividing that sum by the sum of all participants receiving adult individualized and/or training services (denominator).

Table 1: POS Calculation

Priority Calculation: <=50.1%
$\frac{POS\ Groups\ 1 + 2 + 3}{Participants\ receiving\ Adult\ Individualized\ Career\ and/or\ Training\ Services}$
Priority Calculation: >50.1%
$\frac{POS\ Groups\ 1 + 2 + 3 + 4}{Participants\ receiving\ Adult\ Individualized\ Career\ and/or\ Training\ Services}$
See the "Priority Order of Service Provision" section above for a description of each "POS Group" number.

¹⁷ Group 5 is not considered in the numerator for POS calculations.

Tracking and Analysis

Analysis will include a review of the local WIOA Title I Priority of Service Policy, any related procedures, training and monitoring developed and/or conducted by the local WDB and/or the authorized service providers, file and/or system review of client data as well as interviews with staff and leadership to assess understanding and consistent correct implementation of the local policy.

Action

Local areas must revise existing or develop a WIOA Title I Adult Priority of Service policy that ensures priority of service within the workforce region is implemented in alignment with this policy. The local policy must support any additional priority groups identified by the Governor as well as any locally identified priority groups. Each local area must address Adult Priority of Service and any additional locally designated POS groups within their WIOA local plan as stated in the local plan requirements.

Local areas must establish procedures to operationalize their WIOA Title I Adult Priority of Service policy, ensure that staff and leadership are appropriately trained on these procedures, and annually monitor to confirm this policy and the local WIOA Title I Adult Priority of Service policy and procedures are being correctly applied on a consistent basis.

Contents of this policy will be part of routine DWD monitoring.

Effective Date

Immediately.

Ending Date

Upon rescission.

Additional Information

Attachment A - Adult Priority of Service Documentation Table

Additional Information

Questions regarding the content of this publication should be directed to DWD Policy, policy@dwd.in.gov.

Attachment A

Adult Priority of Service Documentation Table

Local areas are required to use the following sources of documentation¹⁸ to verify whether an adult participant qualifies for priority of service under WIOA.

Priority of Service Criteria	Acceptable Documentation
Recipient of Public Assistance	<ul style="list-style-type: none"> • Copy of authorization to receive cash public assistance • Copy of public assistance check • Medical card showing cash grant status • Public assistance records • Refugee assistance records • Self-Attestation as a last resort¹⁹
Low-Income	<ul style="list-style-type: none"> • Alimony Agreement • Award letter from veteran's administration • Bank statements • Compensation award letter • Court award letter • Pension statement • Employer statement/contact • Family or business financial records • Housing authority verification • Pay stubs • Public assistance records • Quarterly estimated tax for self-employed persons • Social Security benefits • Unemployment Insurance documents • Self-attestation as a last resort
Basic Skills Deficient	<ul style="list-style-type: none"> • School records in the form of a referral or records from a Title II Basic Adult Education program or English Language Learner program • Results of academic assessment • Self-attestation • Case notes

¹⁸ Based on TEGL 23-19 Attachment II.

¹⁹ Self-attestation is a participant's statement of his or her status for a particular (PIRL) element (i.e., low-income) with a signed and dated form acknowledging this status (TEGL 23-19, Attachment II). This applies to all references to "self-attestation" within this table. Forms must be maintained in DWD's case management system.



Eric Holcomb, Governor
State of Indiana

Division of Disability and Rehabilitative Services
402 W. WASHINGTON STREET, P.O. BOX 7083
INDIANAPOLIS, IN 46207-7083
1-800-545-7763

To: DDRS Stakeholders

From: Kylee Hope, Director, Division of Disability and Rehabilitative Services (DDRS)
Theresa Koleszar, Director, Bureau of Rehabilitation Services (BRS)

Re: Vocational Rehabilitation Services Order of Selection Implementation

Date: July 10, 2017

The Bureau of Rehabilitation Services (BRS) has received approval from the Rehabilitation Services Administration (RSA) to implement an order of selection. The Rehabilitation Act, as amended by the Workforce Innovation and Opportunity Act (WIOA), requires a state vocational rehabilitation services (VR) agency to implement an order of selection when it does not have sufficient resources to serve all eligible individuals. Under an order of selection, a VR agency is federally required to serve individuals with the most significant disabilities first.

RSA approved the amendment to the VR portion of the WIOA State Plan on June 30, 2017, which outlines the justification for the order of selection, and can be viewed at [by clicking here](#).

The order of selection will be implemented August 1, 2017. Individuals who have an Individualized Plan for Employment (IPE) in place prior to the implementation date will continue to receive services without disruption. Individuals who have applied or are eligible, but do not yet have an IPE in place prior to implementation, are subject to the order of selection. Additional information about order of selection and how it may impact VR applicants and eligible individuals can be found [by clicking here](#).

Additional information can be found at the [VR order of selection resource Web page](#). Please continue to check the resource page for added content this summer.





Order of Selection: Frequently Asked Questions

1. What is an order of selection?

Order of selection is a process for prioritizing eligible individuals that a vocational rehabilitation (VR) agency intends to serve based on available resources and capacity. The federal government requires a state VR agency to implement an order of selection when it does not have enough money or staff to serve everyone who is eligible. The Rehabilitation Act, as amended by the Workforce Innovation and Opportunity Act (WIOA), requires that individuals with the most significant disabilities be served first.

2. Why has the Bureau of Rehabilitation Services (BRS) determined that implementation of the order of selection is necessary?

The decision to implement this process follows identification and implementation of numerous strategies to improve capacity over the past few years. Despite those efforts, BRS has projected a deficit of resources for federal fiscal years 2017 and 2018; and continues to experience significant challenges in building and retaining adequate resources to serve all eligible individuals, and meet expectations for timeliness and quality of service provision.

In addition, efforts to comply with expansive new federal requirements under WIOA are requiring BRS to shift financial resources estimated at up to \$10-12 million annually. More information may be found in the Draft VR Portion of the WIOA Unified State Plan which can be viewed at <http://www.in.gov/fssa/ddrs/5285.htm>. BRS anticipates implementing the order of selection upon approval from the U.S. Department of Education, Rehabilitation Services Administration.

3. What impact does the implementation of an order of selection have on individuals who are already in the VR program?

Individuals who have applied, but are not yet determined eligible, or are eligible but do not yet have an Individualized Plan for Employment (IPE) in place when the order of selection takes effect, are subject to the order of selection. Individuals who are already receiving services under an IPE will continue to receive VR services and supports to work toward their vocational goals in line with their IPE. There will be no disruption in services for individuals who had an IPE in place when the order of selection took effect.

4. For new VR applicants, or those eligible individuals who do not yet have an IPE at the time the order of selection is implemented, how does VR prioritize individuals with the most significant disabilities to be served first?

Once an individual is determined eligible for VR services, the individual's severity level will be determined using the current process. In Indiana, there are three levels of severity, and each individual is assigned to a priority category, based on his/her level as outlined below:

Version 2 - October 2017

Levels of Severity	Order of Selection Priority Categories
1. Individuals with most significant disabilities	Priority Category 1
2. Individuals with significant disabilities	Priority Category 2
3. All other eligible individuals (nonsignificant disabilities)	Priority Category 3

Once the order of selection is implemented, Priority Category 1 will remain open, individuals assigned to this category will be served first, and Priority Categories 2 and 3 will be closed. Those individuals who fall into Priority Categories 2 and 3 are put on a deferred services list and will be served if and when sufficient resources become available.

5. What does it mean to be an individual with a ‘most significant disability?’

An individual must be determined eligible for VR and meet the following additional requirements set forth in 460 IAC 14-8-1(b):

- The individual has a severe physical or mental impairment that seriously limits three or more functional capacities in terms of an employment outcome (*Functional capacity areas include: communication, interpersonal skills, mobility, self-care, self-direction, work skills and work tolerance*); AND
- The individual requires multiple vocational rehabilitation services over an extended period of time.

All eligible individuals who are determined to have a most significant disability are in Priority Category 1, will receive VR services, and will work with a VR counselor to develop an IPE, which outlines his/her desired vocational outcome and necessary services and supports.

6. How does VR assess level of severity for an eligible VR consumer?

VR counselors complete a review and assessment of data to determine eligibility and severity level. Information used by the VR counselor to assess an individuals’ severity level (including functional capacities and the other requirements outlined in question 5) may include: review and assessment of existing data, counselor observations, education records, medical records, relevant information provided by the individual, individual’s representative, or family, or additional assessment if existing data is insufficient. The VR counselor will review all information provided and interview the individual to better understand how the individual’s impairment(s) results in a limitation in one or more functional capacity areas, the services that will be required, and the expected length of time it will take for the individual to achieve competitive, integrated employment.

7. How does VR assess functional capacity limitations?

VR will consider a variety of information to determine whether an individual experiences a limitation in one or more functional capacity areas, such as receptive or expressive

communication, ability to understand oral or written instructions, adaptive technology required, stamina or physical restrictions, needed supports, work experience and skills, appropriate social interaction and behaviors, ability to perform activities of daily living, decision making and problem solving, ability to safely navigate in the home and workplace, and other relevant factors.

8. What happens if an individual does not agree with a VR counselor's determination of severity level?

An individual will receive a letter with information about their eligibility and severity determination, along with information about appeal rights, which may include informal supervisory review, mediation or an impartial due process hearing. The letter will also include information about the Client Assistance Program (CAP). CAP helps individuals with applying for or getting services from VR. CAP is run by Indiana Disability Rights and more information can be found at the following website: <http://www.in.gov/idr/>.

9. Can BRS prioritize serving individuals in Priority Categories 2 or 3 for services, instead of those in Priority Category 1 with a most significant disability?

No, federal law requires that when a VR agency is operating under an order of selection, individuals with the most significant disabilities are served first. This requirement is outlined at 34 CFR 361.36 (3)(iv)(A).

10. What can individuals who do not meet criteria for Priority Category 1 expect, once the order of selection is implemented?

Eligible individuals who are determined not to meet the criteria as an individual with a most significant disability, will be placed in Priority Category 2 or 3 based on his/her severity determination assessment. Unless these individuals already have an IPE in place with VR prior to implementation of the order of selection, these individuals will not be able to receive VR services right away because Priority Categories 2 and 3 will be closed when the order of selection takes effect. Individuals in Priority Categories 2 and 3 without an IPE will be placed on a deferred services list according to the individual's application date. If and when sufficient resources become available for VR to serve additional eligible individuals, those individuals in Priority Category 2 with the earliest application date will be served next. The VR program will engage in ongoing evaluations to determine when sufficient resources are available to provide VR services to eligible individuals in Priority Categories 2 and 3.

11. Individuals assigned to Priority Categories 2 or 3 will not receive VR services once the order of selection begins. How might they obtain assistance in achieving their vocational goals?

VR will provide information and referral services to other workforce options including agencies in each local area, Work One Centers, Ticket to Work Employment Networks, Independent Living

Centers, college and university career centers and disability services offices, the IN Data Assistive Technology program, and other state or local resources.

12. Since VR will be referring individuals to other agencies and resources, including local Work One centers, is BRS taking steps to assist these other entities to prepare to serve an increased number of individuals with disabilities?

Agencies that receive federal funding are required to ensure that services are available for all eligible individuals, which includes individuals with disabilities. BRS is proactively reaching out to state and federal partners to discuss the potential increase in job seekers with disabilities accessing services from these organizations, as a result of the implementation of the order of selection. BRS is prepared to offer training to these entities to assist them in preparing for potentially serving more job seekers with disabilities. As a workforce partner with the Department of Workforce Development, BRS will continue to collaborate and support the Work One centers in providing services to job seekers with disabilities.

13. Once the order of selection is implemented, can individuals continue to apply for VR services?

Yes. There are no changes in the VR application process. VR will continue to schedule all new referrals for an intake appointment to complete the application and assessment process. Using the information that applicants provide, a VR counselor will determine whether each individual is eligible for VR services based on the following eligibility criteria set forth in 460 IAC 14-7-1:

1. The individual has a physical or mental impairment;
2. The individual's impairment results in a substantial impediment to employment;
3. The individual requires VR services to prepare for, secure, retain, advance in, or regain employment; and
4. The individual can benefit from VR in terms of an employment outcome.

For all individuals who are determined eligible for VR, the current process to determine each individual's severity level will occur following the eligibility determination. The severity determination process assesses an individual's functional capacities in the following seven categories: 1) communication, 2) interpersonal skills, 3) mobility, 4) self-care, 5) self-direction, 6) work skills and 7) work tolerance. It also includes an assessment of whether the individual requires multiple services over an extended period of time.

VR counselors use information obtained during the assessment phase to determine eligibility and severity level. The severity level then determines the priority category to which the individual is assigned. Information used by the VR counselor to make eligibility and severity determinations may include: review and assessment of existing data, counselor observations, education records, information provided by the individual or individual's family or additional assessment if existing data is insufficient.

14. When under an order of selection, will VR be able to assist individuals who need services to maintain their job after their VR case is successfully closed?

VR may be able to provide post-employment services of a limited scope and duration to individuals to assist with maintaining, re-entering or advancing in employment. A VR counselor can assist in determining whether post-employment services are available based on each individual's specific circumstances.

15. When BRS determines that sufficient resources become available to begin serving individuals in closed priority categories, how will those cases be identified and disbursed?

When BRS determines that sufficient resources become available to begin serving individuals in one or more closed priority category, those individuals in Priority Category 2 will be prioritized next, according to earliest statewide application date.

16. What impact does the order of selection have on students with disabilities receiving pre-employment transition services?

Pre-employment transition services must be made available statewide to all students with disabilities, regardless of whether the student has applied or been determined eligible for VR services. These services include job exploration counseling, work-based learning experiences, counseling on opportunities for enrollment in post-secondary education, workplace readiness training, and instruction in self-advocacy.

Students who are eligible for VR services, but placed in a closed priority category, may continue to receive pre-employment transition services as long as those activities were initiated prior to being placed in a closed priority category. Students who apply for VR services, are determined eligible, and assigned to a closed priority category, may not begin to receive pre-employment transition services if these services were not initiated prior to the individual being assigned to a closed priority category. VR has taken steps to initiate pre-employment transition services during the VR application intake appointment, so that any student who qualifies may be able to receive pre-employment transition services as they become available.

17. What actions is BRS taking to build capacity and work toward increasing resources to serve all eligible individuals?

Many strategies to improve staffing capacity have been implemented over the last several years, and BRS will continue to identify innovative approaches to increase capacity and ensure appropriate fiscal resources are available. BRS will provide ongoing updates on progress toward increasing personnel and fiscal resources. Updates can be viewed at

<http://www.in.gov/fssa/ddrs/5285.htm>.



Field Operations & Policy Meeting
 Monday, June 19, 2017
 IGSC Conference Room: A
 DWD/VR Summit- IGCS Conference Room C.
 10:00am-3:00pm

12:30am-3:00am – 2017 VR Roundtable Summit

1. Introductions- Dr. Jennifer Walthall, Secretary – Family Social Services Admin

- a. Read a newspaper article from an individual who is blind, autistic and an actor
- b. Co-hosted event
 - Workforce One Stop Operators/ RO/ Service Provider Managers
 - DWD staff – Chapter 31, policy, field operations, employer relations, youth initiatives, adult education
 - Easter Seals Crossroads
 - DDRS – Bureau of Developmental Disabilities
 - Indiana Ahead
 - Department of Higher Education
 - Indiana National Guard
 - Division of Family Resources

2. Overview and goals of summit

- a. Discuss Changes – Changes in Indiana’s Vocational Rehabilitation Program. Order of selection, which may have an impact on your organization.
- b. Address Questions- Understand concerns that you may have, and to identify strategies for addressing those concerns.
- c. Obtain Information- Opportunity to learn about your organization and begin to work on establishing a referral process for jobseekers seeking VR services, impacted by the Order of selection.

3. BRS presentation

- What is vocational rehabilitation? VR is a statewide program that provides services and supports jobseekers with disabilities to assist them in achieving their employment goals. VR provides a wide range of services to prepare, secure, retain, advance in, or regain employment. Services may include training, job placement, rehabilitation technology, VR counseling, guidance etc.
- VR Counselor Stories: “Please refer to the PPT slides”
 - Megan Wheeler
 - Maria
 - Jimmy Kennedy III

4. Eligibility requirements, current challenges & Order of Selection

The needs of the individual is a broad range (Eligibility requirements)

- a) Physical or mental impairment
- b) Funded through the Department of Education
- Current Challenges
 - a) WIOA needs to shift their resources to meet federal requirements
 - b) Insufficient staffing capacity to support the demand for VR services – order of selection was created to combat this

What is order of section and what does it mean?

Definition - After thorough review and evaluation, the Bureau of Rehabilitation Services (BRS) is seeking approval through an amendment to the Unified State Plan to implement a process called “order of selection” for Indiana’s Vocational Rehabilitation (VR) program. Once approved and implemented, VR will prioritize individuals with the most significant disabilities to receive services. A state VR agency is required to implement an order of selection when it anticipates that it will not have sufficient fiscal or personnel resources to fully serve all eligible individuals. Indiana will be the 35th state to implement this process, which must be used to prioritize consumer services in accordance with the Rehabilitation Act, as amended by the Workforce Innovation and Opportunity Act (WIOA). BRS anticipates implementing the order of selection by the end of the current federal fiscal year, pending approval from the U.S. Department of Education, Rehabilitation Services Administration. <http://www.in.gov/fssa/ddrs/5285.htm>

Categories

- Category 1 - Eligible individuals who have the most significant disabilities.
- Category 2 - Eligible individuals with significant disabilities who have limitations in three major areas of functional limitations.
- Category 3 - Eligible individuals with significant disabilities who have limitations in two major areas of functional limitations

Once VR implements, Category 1 – Most Significant Disabilities – will be prioritized to receive VR services

- a. Unable to discuss quickly what this means. But having 3+ functional limitation areas (out of 7) would be someone in this area.
- b. An extended period of time, longer term supports and services
- c. Impairment must result in a substantial impediment to employment;
- d. An individual must be able to benefit from vocational rehabilitation services in terms of employment outcome. Deferred services list are those that have insufficient resources as they have less disabilities
- e. Will provide many resources and agencies that might be able to help the job seekers – required to refer individual to state programs
- f. Information will be available online

5. Discussion of potential impact & Q&A - Address questions and learn about specific concerns:

Q: Does WorkOne still have the ability to refer to VR?

A: Yes. VR will go through all eligibility assessments to determine where they are eligible.

Q: What goes happens to individuals who go on deferment, but they are receiving services from another agency?

A: They will be reassessed, but ensure there is not an overlap of services. We would not stop services from the WorkOne office.

Q: Based on an analysis of your customers, how many do you think will be referred to outside agencies (those that are not Category 1?)

A: Right now 40% individuals are Category 1, they expect this to increase. We are the 35 state to implement this order and the trend has been to have an increase in Category 1. The need for this is due to not meeting timelines and financial constraints.

Q: Does Order of Selection have to stay in place?

A: If fiscal changes and staffing changes, this could change.

Q: How can we be better prepare to serve Category 2 and 3?

A: DOLs expectation is that each agency carries what they can carry. It is understood that not all agencies are able to offer all needs for a customer. This would be for anyone in Category 1

Q: Is it possible for a customer to get VR services if they only need one item, and the rest are being seen by other organizations?

A: This cannot be done due to federal legislations.

Q: When will be seeing this go into place?

A: August 1st but realistically it will probably be sometime in August.

Q: How do we obtain more adaptive materials for customers to use?

A: DWD is taking an inventory who has assistive technology in the office in each region and who knows how to use it. Will also learn best practices through the regions and from both sides of the house.

Q: In ICC there is a question asking jobseekers, do you have a disability? If they answer yes to this question, what is the next step?

A: Still continue the processes, refer to the VR. Plus the services they came into the WO office to get. VR- will then review their case and if they are non- category 1. They will be referred back to the WO for services.

Q: How many are disabled Veterans?

A: VR does not ask to see a DD214 on this. VR serves anyone with a disability.

Q: How long does it take for a decision to be made at VR and who can refer?

A: Anyone can refer. After the referral is made an appointment is made. Then from the time of the initial meeting 60 days from the actual intake appointment will a decision be made. Sometimes in-between weeks if they are requesting additional information.

Q: How do the students move into VR services? Will we have access to their IEP?

A: There is a consent form for that could assist us in retrieving that information.

Q: What does VR see as what they would like to work with Category 2 and 3?

A: All individuals should be treated the same. Understanding the state wants to serve everyone we can, sometimes other agencies will need to serve. Part of the round table is to find out who can make these services available to the jobseeker.

Q: Do we need to have a close door to speak with the individuals?

A: This is not a requirement.

Q: Can we upload any medical documents into ICC?

A: No. You would not want individuals to upload medical history documents unless it is necessary for eligibility. At this time there does not appear to be any reason for this to happen.

Thoughts from the audience:

- a) If a region does not believe an individual has the ability to complete a training due to the preserved ability that they would not succeed. Based on the fact we cannot provide additional supportive services. They might still have access to adaptive technology from other agencies
- b) In order to not to be accused of discrimination. Make sure the individual has a reasonable accommodation.
- c) Of the 3 individuals in the stories you provided who would be served under the new order of selection and who would be referred to others?
- d) VR's required state match dollars is a 21.3%.
- e) Who will be paying for hearing aids for working individuals now?
- f) Remember, just because VR refers the individual, VR is aware the customer will not automatically be eligible for services.
- g) Category 2 and Category 3 are going to be referred to other agencies. It would be helpful for us to know what that number looks like. Can we please be provided this per region?
- h) What services have these individuals been getting? We would like to be prepared to assist them.
- i) WorkOne has smaller resources as well, what are we looking at as far as data for amount of individuals coming in and are not who we are already mutual serving
- j) How will we know what accommodations are needed for individuals, that we can provide?

6. Professional Development of Staff- Topics for training gathered from the Regions

What types of specific training do the partners need for your staff?

- *Maybe at a monthly or quarterly staff meeting, a VR counselor can come in person to provide a training.*

1. Assistive Technology
 2. Etiquette
 3. Better understanding of the 7 Functional Capacity Limitation Area. "What they will be able or not able to get from VR?"
 4. Clarification- Education from the WorkOne about the eligibility criteria. "Can & cannot do from the VR side."
 5. Approved Training provider- or Eligible Training provider.
 6. Additional funding
 7. Compliance- closed door office or only is they request it?
 8. Documentation- how to document the mental health or disability issue?
 9. Case manager notes- on what is appropriate and not appropriate.
 10. Reasonable Accommodations.
 11. Training types of behaviors with different type of disabilities.
-

Tips:

Having a point of contact in each office will be helpful. However, a single point of contact is hard when there the turnover of staff is at its highest.


POC does not have to be a person. It can be the comprehensive WorkOne office in that region

VR has general office email addresses where 2-3 individuals check this on a routine basis. Maybe the WO could look into having a feature like this.

What we want to avoid is a circular referral to one another. Let us create a processes to put in place. For example Region 1. Region 1 uses a paper referral form to pass back and forth. DOL stated it met the direct linkage (access) with the use of the scheduling system. The form by itself did not meet the needs of this. It also helped keep sensitive information off the fax machines.


Excerpts from DWD/VR Training Presentations

Excerpt from June 2017




Indiana Department of Workforce Development

IDWD Overview, WIOA, and Vocational Rehabilitation Training Collaboration



WorkOne Overview




Most Career Centers offer:


- Computers with Internet access
- Referrals to community/Partner Services
- Job Boards
- Job Seeker Library
- Over-the-Shoulder Assistance



Websites and Resources



www.hoosierdata.in.gov



WorkOne Overview

12 Regional Workforce Boards

- Membership: business, education, labor, community, WIOA partner and economic development leaders
- Responsibilities: Strategic vision of workforce development and governance of the WorkOne centers.




Websites and Resources



www.in.gov/dwd




Workforce Investment and Opportunity Act (WIOA)



WorkOne Overview


Over 90 Comprehensive and Affiliate Career Centers

- Assisting job seekers and businesses in connecting with the right resources to meet their particular needs
- Providing job referrals, training information, placement assistance, community connections, labor market information, and helping employers find qualified workers




Websites and Resources


IndianaCAREERConnect.com (ICC)
Indiana's #1 Source of Job Openings

WIOA




- Overview
 - President Barack Obama signed WIOA into law on July 22, 2014. WIOA is designed to help job seekers access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy.
 - Congress passed the Act by a wide bipartisan majority; it is the first legislative reform in 15 years of the public workforce system.


Excerpt from August 2017



WORKING WITH VR REFERRALS


AUGUST 2017






WELCOME


This training was developed jointly by Department of Workforce Development (DWD), WorkOne, and Vocational Rehabilitation Services (VR) staff in the spirit of collaboration to better serve our fellow Hoosiers to assist them with achieving their employment goals.



DISABILITY FACT OR FICTION


SELF-QUESTIONNAIRE






DISABILITY FACT OR FICTION

How did everyone do? Any takeaways?






OBJECTIVES

- To gain a greater understanding of VR, to include its purpose, the individuals it serves, and the services it offers
- To learn about Order of Selection (OOS) for VR and the impact it will have on local WorkOne offices
- To understand the process by which VR will refer individuals to the local WorkOne offices
- To equip local WorkOne staff to effectively assist individuals referred by VR




ACTIVITY: DEBUNKING MYTHS






DEBUNKING MYTHS

WorkOne staff will need to learn about clinical diagnoses and detailed information about different disabilities.	WorkOne staff will focus on the participant's barriers to employment, not diagnoses, as with any other participant.
--	---



DEBUNKING MYTHS

WorkOne offices will have to start providing services to participants referred from VR that they have not provided before.	WorkOne offices will continue to provide the same services to participants as they have before VR entering into OOS.
--	--



DEBUNKING MYTHS

WorkOne offices will likely see a huge increase in the number of individuals coming through their doors due to VR going into OOS.	WorkOne offices will likely see an increase, but the volume is unknown at this point. WorkOne staff will determine program eligibility as they would for any other participant.
---	---

Element 5: Compliance with Disability Nondiscrimination Requirements

[29 CFR 38.12 through 38.17]

Indiana complies with the disability related requirements of WIOA Section 188, Section 504 of the Rehabilitation Act of 1973, as amended, and the Americans with Disabilities Act (ADA) of 1990, as amended, as well as implementing regulations, including, but not limited to 29 CFR Parts 32 and 38. These laws and regulations prohibit discrimination on the basis of disability in any program or activity receiving federal financial assistance. Applicable requirements are communicated through DWD Policy 2016-09 “Equal Opportunity and Nondiscrimination Guidance Letter” and general training was provided to the Local EO Officers via presentation module/conference call training in 2016-2017.⁷¹

The accessibility provisions of 29 CFR Part 38 require that facilities are accessible and usable by individuals with disabilities⁷² and that programs and activities be programmatically accessible, which includes providing reasonable accommodations for individuals with disabilities, making reasonable modifications to policies, practices, and procedures, administering programs in the most integrated setting appropriate, communicating with persons with disabilities as effectively as with others, and providing appropriate auxiliary aids or services, including assistive technology devices and services, where necessary.⁷³

Physical Accessibility

As part of the One-Stop Certification process⁷⁴ discussed in Element 3, each LWDA EO Officer utilizes an informal checklist, adapted from a checklist frequently used by VRS, to note major compliance areas such as parking, accessible routes, ramps, entrances and doors, signage, and restrooms.⁷⁵ The EO Officers identified areas of noncompliance and have completed, or are in process of corrective action where necessary.⁷⁶ Required modifications depend upon which facilities may be subject to the “safe harbor” provisions of the 2010 ADA standards. If a facility was in compliance with the 1991 ADA standards as of March 15, 2012, that facility may be “safe harbored” and therefore not required to make modifications unless the facility undergoes alterations. If alternations are made, however, they may trigger a requirement for compliance with the newer 2010 ADA standards.⁷⁷ DWD anticipates additional training for its State and Local EO Officers to better understand ADA requirements for existing facilities.

⁷¹ Documentation 5.1: Excerpt from Local EO Officer NDP Training Element 5 PowerPoint

⁷² 29 CFR 38.13(a)

⁷³ 29 CFR 38.13(b)

⁷⁴ DWD Policy 2016-10 (See Documentation 3.5); Documentation 5.2: Excerpt from One-Stop Certification Tool, Section 8

⁷⁵ Documentation 5.3: ADA Inspection Form

⁷⁶ Documentation 5.4: Sample WorkOne Office Completed ADA Inspection Form

⁷⁷ ADA Update: A Primer for State and Local Governments,
https://www.ada.gov/regs2010/titleII_2010/title_ii_primer.html

The State EO Officer, in conjunction with Compliance and Policy Workforce Division Monitoring staff, conduct annual on-site monitoring of each LWDA where physical accessibility compliance is an element of review and discussion. Annual office reviews typically include, but are not limited to, a check of parking spaces/signage, compliant restroom facilities, wheelchair accessible entrances, and access to TTY/TDD or Relay services.⁷⁸ Whenever there are new AJC offices, the State EO Officer ensures that the office has been reviewed for compliance in ADA standards.

Programmatic Accessibility

In efforts to improve programmatic accessibility, DWD utilized Disability Employment Initiative (DEI) grant funding to install several new assistive technology (AT) workstations in WorkOne offices throughout the state. These workstations were installed in 2016 and include adjustable workstations, articulating arm supports, large print keyboards, and ultra HD video magnifiers.⁷⁹ Following up on this AT initiative, the State EO Officer conducted an informal full state audit in 2017 to determine what equipment and software were available in each WorkOne office, as well as adequacy of staff training to utilize the AT.

The audit results indicated a variety of AT being utilized in the WorkOne offices, some of which includes print, visual, and audio materials in multiple mediums to include Zoom Text software, large key caps, and other accommodations for individuals with disabilities.⁸⁰ Additionally, all comprehensive WorkOne offices have an accessibility workstation like those installed under the DEI grant.⁸¹ These workstations may include a larger computer screen, Braille keyboards, and keyboards with large text letters. For effective communication, all WorkOne offices have access to TTY/TDD and/or Relay Indiana⁸² services as well as interpreter services as discussed in Element 2, including American Sign Language (ASL) interpreter services.

Results varied regarding staff knowledge and training, with some LWDAs reporting the need for additional training and others providing examples of local training tools in current use.⁸³ Recognizing the need for further AT training, as well as general disability-related training for WorkOne staff, DWD collaborated with partners such as VRS and Easter Seals Crossroads to develop and implement staff training. For example, DWD and VRS cohosted a “Disability Etiquette” training as part of a staff training initiative in 2017, and provided the LWDAs several resources for local level AT training, some of which was derived from prior training from Easter Seals Crossroads. These resources included instructional videos, reference guides, software

⁷⁸ Documentation 5.5: On-Site Office Review Checklist

⁷⁹ Documentation 5.6: DWD News Release

⁸⁰ Documentation 5.7: Accessible Hardware Overview; Documentation 5.8: Accessible Software Overview

⁸¹ For WorkOne Accessible Work Station Training (closed captioning is provided), see <https://www.youtube.com/watch?v=j8XF9jJSrc>

⁸² For information on Relay Indiana, see www.relayindiana.com

⁸³ Documentation 5.9: Sample LWDA Auxiliary Area Guide

user manuals, and other documents that were shared with LWDAs in late 2017. DWD directed the LWDAs to complete the local level staff training in early 2018.⁸⁴ Additional training will be scheduled October 2022. There is also customer and staff handbooks on using accessibility workstations and will also be available in Spanish.

The Reemployment Services and Eligibility Assessment (RESEA) Program is funded by the U.S. Department of Labor to help unemployment insurance claimants return to work faster. Permanently separated claimants are required to participate in the RESEA program. Earlier this year, the State's RESEA program had all its required workshops and forms translated into a Braille format.

DWD's webmaster has completed various trainings that address accessibility for web design. The knowledge gained from these trainings was implemented to DWD's website throughout to make it more accessible to individuals with disabilities. Examples include checking that all images had alt text, added appropriate roles and aria labels to the top ten pages, and added aria labels to pages with sub-navigation. DWD's webmaster attended the MS Ability Summit in May of 2022 and has completed several additional trainings with topics including making PDFs accessible, digital accessibility, Easter Seals trainings on accessibility tools, and accessibility components with animation. This training has made accessibility a focus of the webmaster's daily work and a main performance goal. The webmaster is currently working on making DWD's PDFs, UI documents, and public web pages accessible from Adobe Acrobat Standards. DWD's webmaster has been a consultant for Indiana's LWDAs and various teams throughout DWD on Web Content Accessibility Guidelines (WCAG), which led to various discussion and increased awareness around the topic of accessibility. DWD plans to have an agency training on accessibility provided by the webmaster and collaborate with FSSA on reviewing components of DWD's website.

In 2022, Indiana's state website underwent a redesign, which included DWD's website. Now the website includes several accessibility adjustment settings including several accessibility profiles including a vision impaired profile and ADHD friendly profile. Adjustments can also be customized for font sizing, line height, letter spacing, color contrast, color saturation, and more. There is also screen reading and translation.⁸⁵

Medical Information

DWD and its recipients may not conduct pre-employment medical examinations or question an applicant for employment or training as to whether the applicant has a disability or the severity of the disability. However, recipients may make a pre-employment inquiry of an applicant's

⁸⁴ Documentation 5.10: DWD Technical Guidance and Training Deadline Email

⁸⁵ Documentation 5.11: DWD Website Accessibility Adjustments

ability to perform job-related functions.⁸⁶ Job postings on ICC are written to ensure postings do not contain discriminatory language or language that would screen out an individual with a disability on the basis of the disability.

Pursuant to confidentiality requirements, disability status and medical information are kept in a secured location, apart from other files, and accessible only to certain staff on a need-to-know basis, including supervisors and managers, first aid and safety personnel, and program staff responsible for documenting eligibility (where disability is an eligibility criterion for a program or activity).⁸⁷ Government officials may also access this information as necessary to enforce laws and regulations.

⁸⁶ 29 CFR 32.15

⁸⁷ 29 CFR 38.41

Element 5 Documentation

Documentation 5.1: Excerpt from Local EO Officer NDP Training Element 5 PowerPoint

Documentation 5.2: Excerpt from One-Stop Certification Tool, Section 8

Documentation 5.3: ADA Inspection Form

Documentation 5.4: Sample WorkOne Office Completed ADA Inspection Form

Documentation 5.5: On-Site Office Review Checklist

Documentation 5.6: DWD News Release

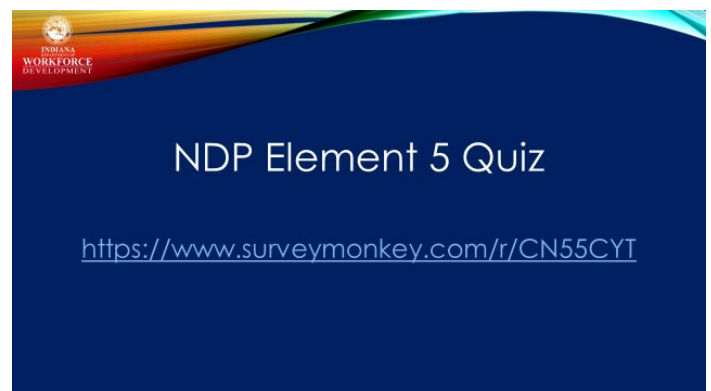
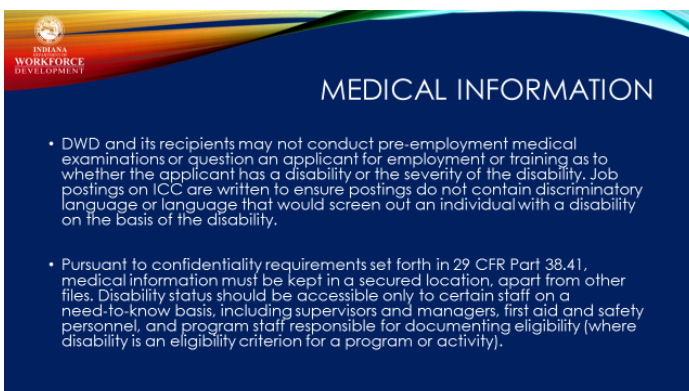
Documentation 5.7: Accessible Hardware Overview

Documentation 5.8: Accessible Software Overview

Documentation 5.9: Sample LWDA Auxiliary Area Guide

Documentation 5.10: DWD Technical Guidance and Training Deadline Email

Documentation 5.11: DWD Website Accessibility Adjustments



Standard 8 - Physical Accessibility

8.1	Center physical accessibility is in compliance with all accessibility requirements under Federal Law. The one-stop center meets the physical accessibility requirements under WIOA Sec. 188, set forth in 29 CFR 38.	Meets	Does Not Meet	In Progress
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Verify with Local EO Officer and State EO Officer.			
Comments: Click here to enter text.				
8.2	Staff and program partners demonstrate they know how to use adaptive and assistive technologies and are aware of the available resources.	Meets	Does Not Meet	In Progress
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Verify through staff interviews and observation.			
Comments: Click here to enter text.				
8.3	A written policy explains how required partners in the one-stop center make reasonable accommodations and includes procedures for handling requests for accommodations.	Meets	Does Not Meet	In Progress
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Review reasonable accommodations policy and/or procedures.			
Comments: Click here to enter text.				

8.4	Workshops are accessible to all customers whether provided in person or virtually. The one-stop center provides reasonable accommodations to ensure equal access.	Meets	Does Not Meet	In Progress
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Verify through observation and staff interviews to ensure workshops are accessible and reasonable accommodations are provided as needed. Comments: Click here to enter text.			
8.5	The one-stop center utilizes available resources, such as Vocational Rehabilitation Services, to ensure accessibility.	Meets	Does Not Meet	In Progress
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Verify through staff interviews and observation. Do staff know when to make appropriate referrals to agencies such as VR, when needed? Are staff aware of available interpreter services/ technology for limited English proficient (LEP) individuals? Comments: Click here to enter text.			

ADA Inspection Form

This is an inspection form and does NOT suggest full compliance.

Property Location/Name _____

Inspected by _____ Inspection Date/time _____

NOTE: Item # corresponds to diagrams on following pages.

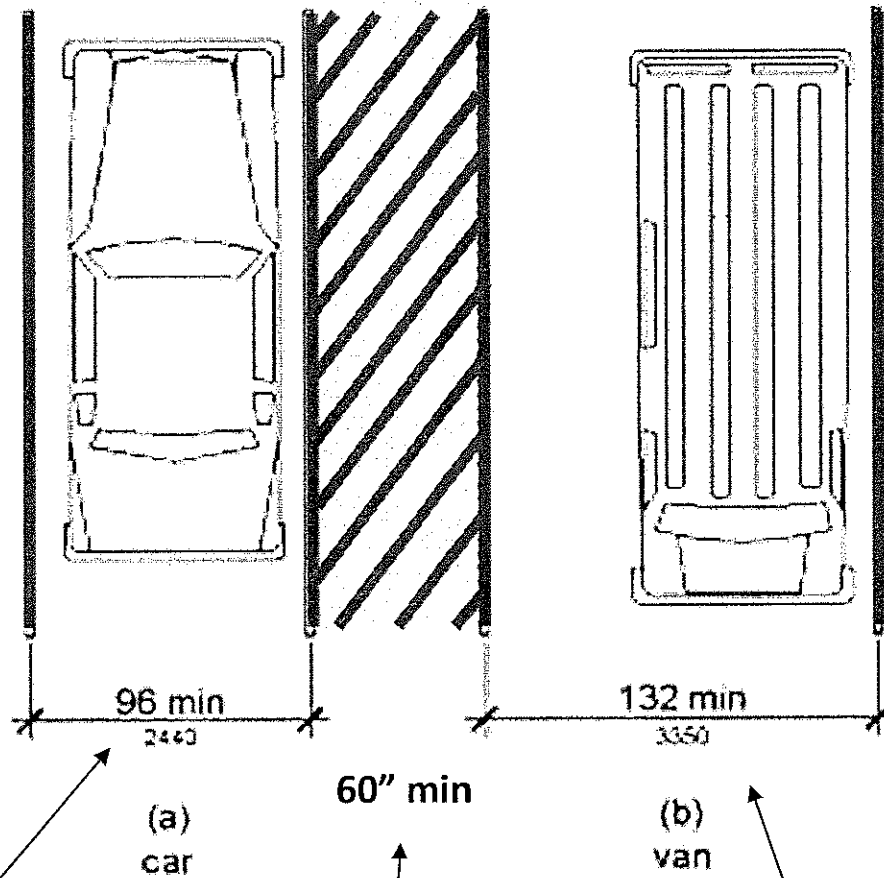
ITEM #	DESCRIPTION	GOOD	NEEDS REPAIR	COMMENTS
A.	Parking Space			
1	Vertical Sign (note height from bottom edge of sign)			
2	"Van Accessible" on sign			
3	Access aisle (60") / Vehicle space (96")			
4	Van space (132")			
5	Blue lines			
B.	Access Route			
6	36" minimum width			
7	Grades/cross slopes (5%/2%)			
8	Surface firm, stable and slip resistant			
9	Openings (1/2 " max)			
10	Changes in level (1/2" max)			
C.	Doors			
11	Levered handle			
12	5lbf			
13	Signage on pull side			
14	32" min width			
D.	Restroom (WC)			
15	60" clearance			
16	Grab bars (side and back)			
17	Flush on wide side			
18	Toilet paper w/in reach			
19	Seat height (17-19")			
E.	Restroom (sink)			
20	Height 34" max			
21	Faucet handles			
22	Mirror reflecting surface height (40" max)			
23	Paper towel/dryer 48" height max			
F.	Maintained			
24	Clean/Working order			
25	Area free of litter and hazards			

Item #	ABATEMENT SECTION: Narrative of Action Taken	Date

Parking Space Inspection

1. Bottom edge of vertical sign(s) 60" from bottom of sign to pavement.

2. The words "Van Accessible" are on the sign of the space with the wider side.



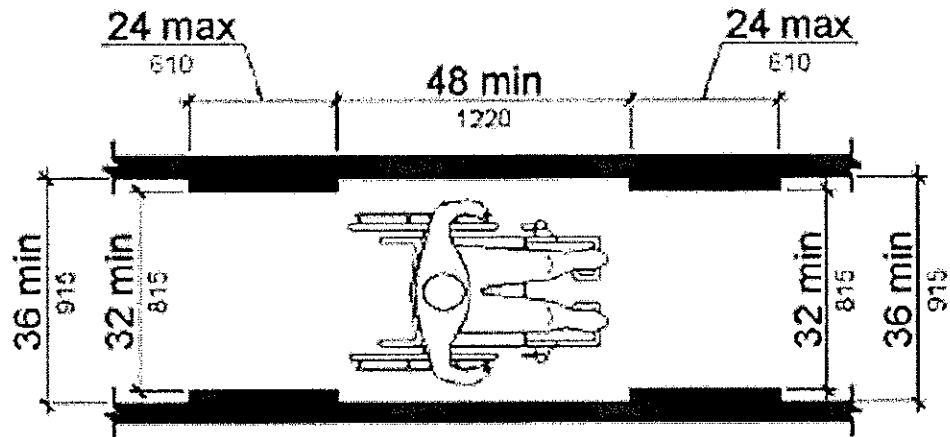
3. Accessible space 96" wide minimum and access aisle 60" minimum.

4. Van space is 132" minimum.

5. Space and access aisle marked with blue lines.

Access Route Inspection

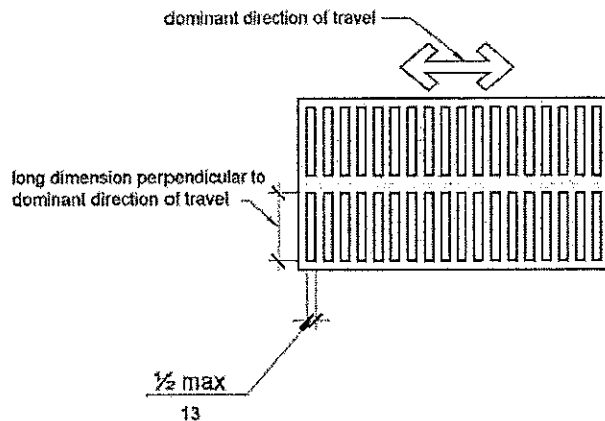
6. Minimum width should be 36", but can decrease to 32" for no longer than 24".



7. Grades and cross slopes shall not exceed 5% and 2% respectively.

8. Walking surfaces shall be firm, stable and slip resistant. (no large, loose stone.)

9. Openings along routes shall not exceed ½".



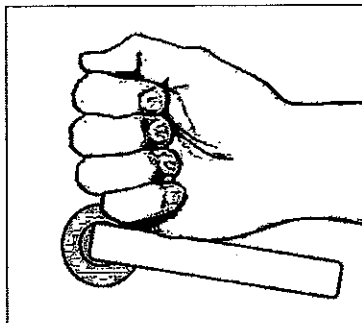
10. Changes in level cannot exceed $\frac{1}{2}$ ".



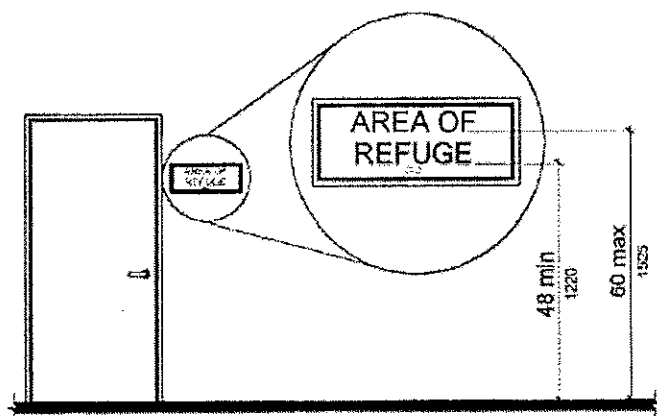
Doors Inspection

11. Either a levered knob or handle that can be operated with a closed fist.

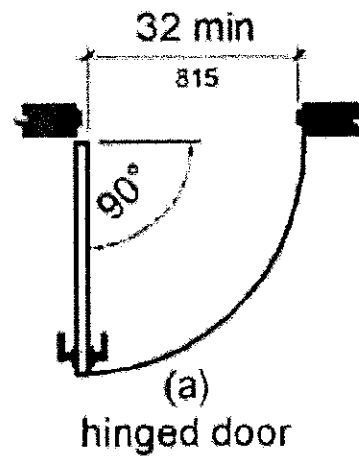
12. The door opening force cannot exceed 5 pounds of force unless it is a door with a powered opener.



13. Signage is to be located on the pull side no higher than 60" to the centerline of the sign.



14. Door openings shall not be less than 32".

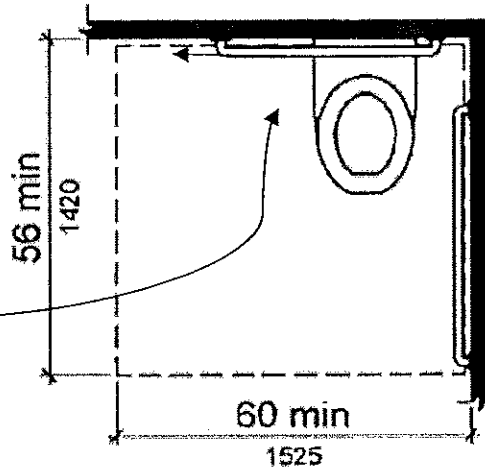


Restroom (Water Closet) Inspection

15. There needs to be a 56 x 60" clear space at the water closet.

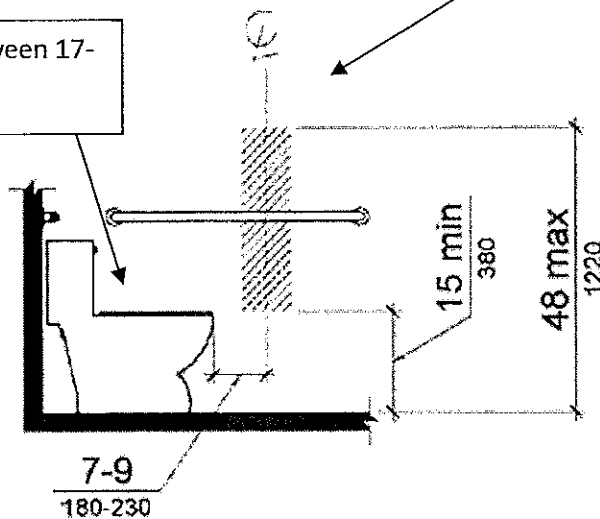
16. Are grab bars on the side and back of the stall (33 – 36" from the floor to the top of the bar surface)?

17. Is the flush handle on the wide side?

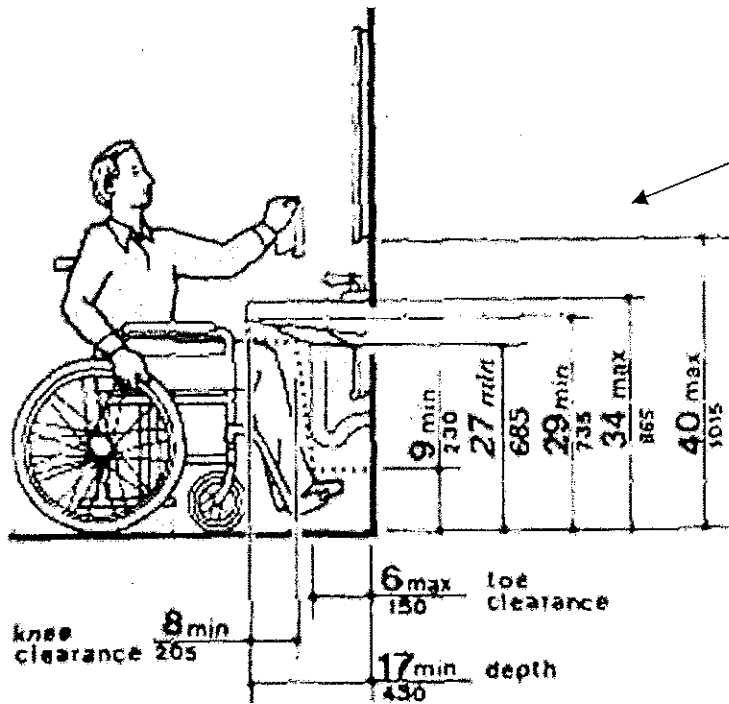


18. The toilet paper shall be within reach range.

19. The top of the toilet seat shall be between 17-19" from the floor.



Restroom (Sink) Inspection

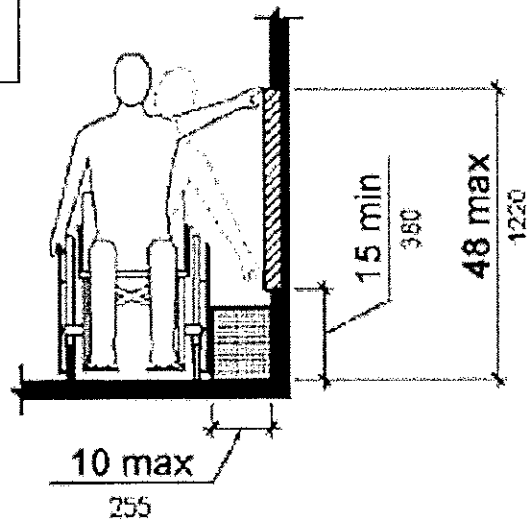


20. The maximum sink height is 34"

21. Faucet handles should be levers, one-hand operation.

22. Reflecting surface of mirrors shall be no higher than 40".

23. Paper towels, dryers, controls shall be no higher than 48".



ADA Inspection Form

This an inspection form and does not suggest full compliance

Property Location/Name:	Greenfield WO
Inspected by:	Cindy Gosser
Inspection Date/Time:	8/16/2021

Note: Item # corresponds to diagram on following pages.

Item #	Description	Good	Needs Repair	Comments
A	<i>Parking Space</i>			
1	Vertical Sign (note height from bottom edge of sign)	X		
2	"Van Accessible" on sign	X		
3	Access aisle (60") / Vechile space (96")	X		
4	Van Space (132")	X		
5	Blue Lines	X		
B	<i>Access Route</i>			
6	Access Route (36" minimum width)	X		
7	Grades/Cross Slope (5%/2%)	X		
8	Surfaces firm, stable and slip resistant	X		
9	Openings (1/2" max)	X		
10	Change in Level (1/2" max)	X		
C	<i>Doors</i>			
11	Levered Handle	X		
12	Opening Force (5 pounds)	X		
13	Signage on pull side	X		
14	Opening (32" min width)	X		
D	<i>Restroom (Water Closet)</i>			
15	Clear Space (60" clearance)	X		
16	Grab Bars (side and back)		X	need to add 1 back grab bar
17	Flush on wide side	X		
18	Toilet paper w/in reach	X		
19	Toilet Seat Height (17-19")	X		
E	<i>Restroom (Sink)</i>			
20	Sink Height (34" max)	X		
21	Faucet Handles	X		
22	Mirror reflecting surface height (40" max)	X		
23	Paper Towel/dryer 48" height max	X		
F	<i>Maintained</i>			
24	Clean / Working order	X		
25	Area free of liter and hazards	X		

Item #	ABATEMENT SECTION: Narrative of Action Taken	Date
	All items are in progress	11/17/2017
	All remaining items are in progress	6/8/2020
	All remaining items are in progress	11/16/2020
	All remaining items are in progress	8/16/2021

Accessibility: 38.13		Requirement: Physical accessibility. No qualified individual with a disability may be excluded from participation in, or be denied the benefits of a recipient's service, program, or activity or be subjected to discrimination by any recipient because a recipient's facilities are inaccessible or unusable by individuals with disabilities. Programmatic accessibility. All WIOA Title I- financially assisted programs and activities must be programmatically accessible, which includes providing reasonable accommodations for individuals with disabilities, making reasonable modifications to policies, practices, and procedures, administering programs in the most integrated setting appropriate, communicating with persons with disabilities as effectively as with others, and providing appropriate auxiliary aids or services, including assistive technology devices and services, where necessary to afford individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of, the program or activity.
Is the recipient meeting its physical and programmatic accessibility obligations for individuals with disabilities?		
Benchmarks:		
<input type="checkbox"/>	Individuals with disabilities have adequate parking spaces	
<input type="checkbox"/>	Individuals with disabilities have appropriate wheelchair accessibility (doors, space allowances, ramps, access routes)	
<input type="checkbox"/>	Individuals with disabilities have appropriate restroom accommodations	
<input type="checkbox"/>	Individuals with disabilities are afforded the opportunity to participate in services or training that is equal to or as effective as provided to non-disabled participants	
<input type="checkbox"/>	Individuals with disabilities have been provided adequate working assistive technology, as needed	
<input type="checkbox"/>	Staff has been trained on use of the assistive technology to properly assist participants	
<input type="checkbox"/>	Meaningful accommodations are provided regarding registration for the provision of aid, benefits, services or training, including core and intensive training and support services, to individuals with disabilities	
Interview Questions and Responses:		
<ul style="list-style-type: none"> Describe the assistive technology provided to individuals with disabilities. 		
<ul style="list-style-type: none"> How have staff been trained on the use of the assistive technology to ensure that they can properly assist participants? 		
<ul style="list-style-type: none"> Do you have outstanding issues that make any offices noncompliant with the requirements of physical or programmatic accessibility? 		
		Additional Documents: <ul style="list-style-type: none"> Copy of any ADA survey updates
		Comments:

<ul style="list-style-type: none">Describe any accommodations, both physical and programmatic, that have been made to include individuals with disabilities in services, programs, or trainings. Are there any updates to the ADA survey that you can provide?	
<p>OVERALL CONCLUSION:</p> <p>The Region:</p> <p><input type="checkbox"/> has taken minimal action</p> <p><input type="checkbox"/> is working toward compliance</p> <p><input type="checkbox"/> is in compliance</p>	



For Immediate Release | 3/23/2016

Contact: Al Ensley

Phone: 317-232-7358

Email: aensley@dwd.in.gov

DWD Unveils Assistive Technology at WorkOne Career Centers

INDIANAPOLIS (March 23, 2016) – As part of Disability Awareness Month, the Indiana Department of Workforce Development (DWD) and its WorkOne partners are unveiling new workstations that contain assistive technology designed to help Hoosiers with disabilities in their search for gainful employment. These workstations can be found at twelve WorkOne Career Centers throughout the state, with nine more being added by the end of the year.

WorkOne assistive technology workstations include adjustable workstations, articulating arm supports, large print keyboards, and ultra HD video magnifier. WorkOne team members have been participating in regular training sessions to learn new strategies for assisting individuals with disabilities in their job search.

“The Department of Workforce Development exists to provide access to tools and services that enable Hoosiers to prepare for, obtain and retain employment,” said Steven J. Braun, Commissioner of the DWD. “Every job seeker has a different set of barriers to employment, and it is important that DWD staff and our WorkOne partners are trained and ready to assist Hoosiers with disabilities in their search for gainful, integrated employment. The addition of new assistive technology will enable us to better serve some of our most vulnerable and underemployed citizens.”

In addition to the assistive technology at WorkOne offices, DWD staff will join hiring managers, HR professionals and business owners from across Indiana for a disability inclusion conference on March 24, 2016. [“The Successful Recipe for Disability Inclusion”](#) is a day-long training seminar that will focus on ways organizations can improve accessibility in the hiring process, modernize digital and physical infrastructure and raise staff awareness of disability etiquette.

The workstations and conference are part of the Disability Employment Initiative (DEI), which is jointly funded and administered by the U.S. Department of Labor’s Employment and Training Administration and its Office of Disability Employment Policy. The DEI grant is designed to improve education, training and employment opportunities for adults with

disabilities (ages 18-64) who are unemployed, underemployed and/or receiving Social Security disability benefits.

Visit www.in.gov/dwd/2416.htm for more information about DEI, other WorkOne initiatives to assist Hoosier with Disabilities and a list of locations with assistive technology. For more information on the March 24th Disability Inclusion Conference, please visit www.makingdiversitywork.org.

-30-



Update your subscriptions, modify your password or email address, or stop subscriptions at any time on your [Subscriber Preferences Page](#). You will need to use your email address to log in. If you have questions or problems with the subscription service, please visit subscriberhelp.govdelivery.com.

This service is provided to you at no charge by [Indiana Department of Workforce Development](#).

This email was sent to ceberry@dwd.in.gov using GovDelivery, on behalf of: Indiana Department of Workforce Development
· Indiana Government Center South
10 North Senate Avenue · Indianapolis, IN 46204 · (800) 891-6499



Accessible Hardware Overview Outline:

Infinity **Adjustable Workstation:**

This workstation is a height adjustable workstation that allows the user to independently raise and lower the workstation surfaces with an easy-to-use switch located at the front of the workstation. This workstation will be helpful for persons who are in a wheelchair or those who have musculoskeletal issues that require periodic movement to control pain.



Articulating Arm Supports:

Clients who suffer from repetitive stress injuries (i.e. carpal tunnel) will utilize these articulating arm supports while using the computer to relieve stress in their wrists and arms. Additionally, these arm supports are fully adjustable.



Viewsonic 24" Monitor:

This is a larger screen display that will allow persons with visual impairments more screen surface to view information better. Larger screen monitors automatically make the viewable information larger and when coupled with the Windows Built-in Magnifier access to the computer will become much easier.



Merlin Elite Full HD Video Magnifier:

The Merlin Elite Full HD Video Magnifier has an 24 inch HD monitor and is used by persons with visual impairments to view printed materials (ex. applications, resumes, reading materials, etc.). It comes with controls on the middle front of the monitor to control magnification, color contrast, and focus adjustments. Additionally the X-Y table is used to easily maneuver printed documents for ease of access.



Kensington Expert Mouse:

The Kensington Expertmouse trackball is a pointing device that reduces the amount of movement needed to move a mouse pointer around the computer screen. Clients who have limited mobility or repetitive stress injuries (i.e. carpal tunnel) will benefit from using this pointing device by reducing fatigue and strain that results from using a standard pointing device. Additionally, this pointing device features four programmable buttons and 6 quick launch buttons that can increase a person's efficiency by opening programs and dragging items across the screen with the click of a button.



Microsot LX-3000 Headset:

The Microsoft LX-3000 headphones are designed to limit outside noises while listening to audio output from the computer. They also double as a microphone for using voice-input software such as the built-in Windows Speech Recognition software. Persons with visual, cognitive and/or physical impairments will use this Headset as they use audio output software (ex. Jaws, NaturalReader) or voice input software (ex. Windows Speech Recognition).



EnableMart Large Print Keyboard:

The Large Print Keyboard enlarges the letters and symbols that are on a standard keyboard by almost four times the actual size. This keyboard allows clients with low vision to more easily access the computer keyboard.

**LSS Video Magnifier Cart:**

The LSS Video Magnifier Cart will provide a portable station for the Merlir Elite Full HD Video Magnifier. This portable cart will allow staff to transport the video magnifier to their workspaces should they be meeting with someone with a visual impairment. The cart has a large surface to hold the video magnifier and other materials. It also has locking casters that will keep it from rolling around when in use.

**Ergonomic Office Chair:**

The ergonomic office chair will allow persons with musculoskeletal issues to properly position themselves while using the workstation. The chair offers several adjustments for proper positioning including seat height, seat tilt, seat depth, back height, arm height, and lumbar support.



Accessible Software Overview Outline:

Windows Speech Recognition:



Windows Speech Recognition is a voice input program that allows a person to access the computer without the use of the keyboard or mouse. By taking spoken language and translating it into text and system commands a person can operate the computer by simply talking to it. This includes opening up programs, operating the mouse, dictating text, scrolling web pages, using program menus, etc.

Natural Reader 13:



Natural Reader is a text-to-speech program that will allow persons who have difficulty with reading (ex. Literacy, Dyslexia, etc.) to read Word, PDF, Internet files.. This program reads e-text verbally to the user in naturally sounding voices and will assist with both reading and reading comprehension.

Windows Magnifier:



Windows Magnifier magnifies the computer screen for persons with visual impairments. It provides incremental magnification and multiple viewing options (full, docked, lens) to assist folks with viewing information that is displayed on the screen.

Jaws for Windows (Screen Reader):



Jaws is a screen reading system which will allow users who are blind or visually impaired to access the computer. Jaws (Screen Reader) reads information that is displayed on the computer screen and provides context to the user so they know how to navigate or interact wherever the computer's focus is. This program also provides accelerator keystrokes for accessing a variety of productivity tools such as MS Word, Internet, Email, etc.

Allen County Auxiliary Area Guide



Turning on:

Turn on computer (underneath the desk) if it is not already on
Login to public account
Use same password as the IRA computers
Desktop is set up the same as IRA computers

Arm supports:

There are arm supports on both sides of the desk for customers who need the additional support when typing or using the mouse.



Keyboards:

There are two keyboards that may be utilized.
Both are connected to the computer so nothing needs to be plugged in or unplugged.
The keyboard setting on the desk has larger font than the keyboards in the IRA.



The second keyboard is attached by Velcro so it can moved and utilized on the desktop of on the customer's lap.



Speakers/Headphones:

There are multiple speakers connected to the computer but they are set to off. If a customer needs the volume louder please have them use the headphones so other customers will not be able to hear the information being presented. If the customer is not able to utilize the headphones you may have them use a private room or have them come in outside of our normal office hours.

There is a set of headphones with a microphone on the desk.

You will need to plug into the telephone or the computer for the customer to utilize.

There are two connectors on the headphones- one is for the headphones and one is for the microphone. If you are using for listening only, you don't have to plug in the microphone portion.

Zoom

When the customer has physical documents they need to view. You will utilize the Clearview system for this.



You need to click on the red power button to turn on the system.



Place the document on the base of the system. (Where it says Optelec).

The document will appear on the monitor of the system.

Turn the dial to decrease or increase the size of the document.

If you push in the center of the dial it will change the background from white to black. This helps many customers with visual impairments. Clicking the button again will revert back to a black background.



TTY:

TTY is Text Telephone which may be used for customers that have a hearing impairment.

Turn the power on with the button located to the right of the display screen.



Pick up the receiver on the phone, push 9 for an outside line and dial the number.



Place the phone receiver on top of the TTY machine.

Dial 9 (to get outside line if applicable), then dial 711 or 800-743-3333

Operator at Relay Indiana will answer and type "RELAY INDIANA, #, M or F (operator gender), and NUMBER CALLING PLS GA". (Which means please go ahead).

Type number you wish to call and the name you wish to speak with and then GA.

They must read everything you type to the person they are calling and they must tell you everything the person states also. They are not able to make judgment calls on what to share.

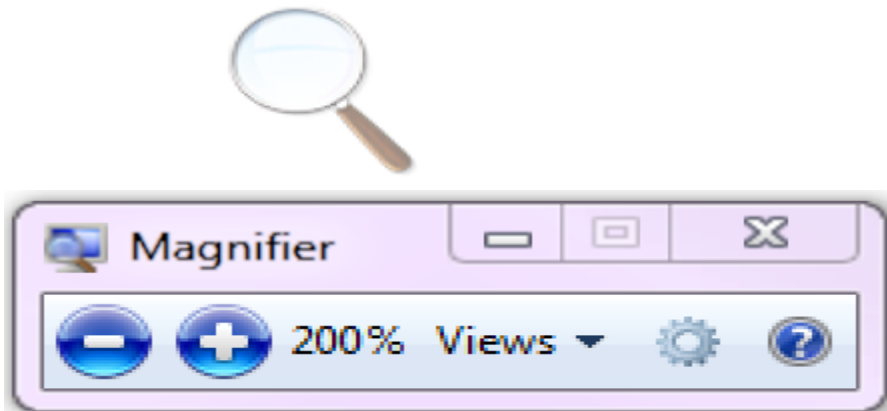
TTY abbreviation guide:

Type: GA= Go Ahead PLS GA= Please Go Ahead SK= Stop Keying (done talking) Q= Question GA
to SK= you are done unless he or she has more to add

Magnifying:

There are a few different ways to increase the size of font on the computers:

Click on the start button on the bottom left corner of the screen, type magnifier in the search box, then click on the magnifier icon. To change the size of the font on the screen: click on the magnifying glass, then click on – or + to decrease or increase the size. To close the magnifier: click on the magnifying glass and then click on the x.



Many programs, including Microsoft Outlook, Word and Excel all have magnifying controls on the bottom right hand corner. Click on the – or + to decrease or increase the size.



Most programs also allow keyboard or mouse cheats to do this as an alternative method. Click Ctrl while using the mouse scrolling function to decrease or increase the size.

On screen keyboard

Click on Start bottom, in Search box- type Ease of Access Center, Click on Start on-Screen Keyboard.

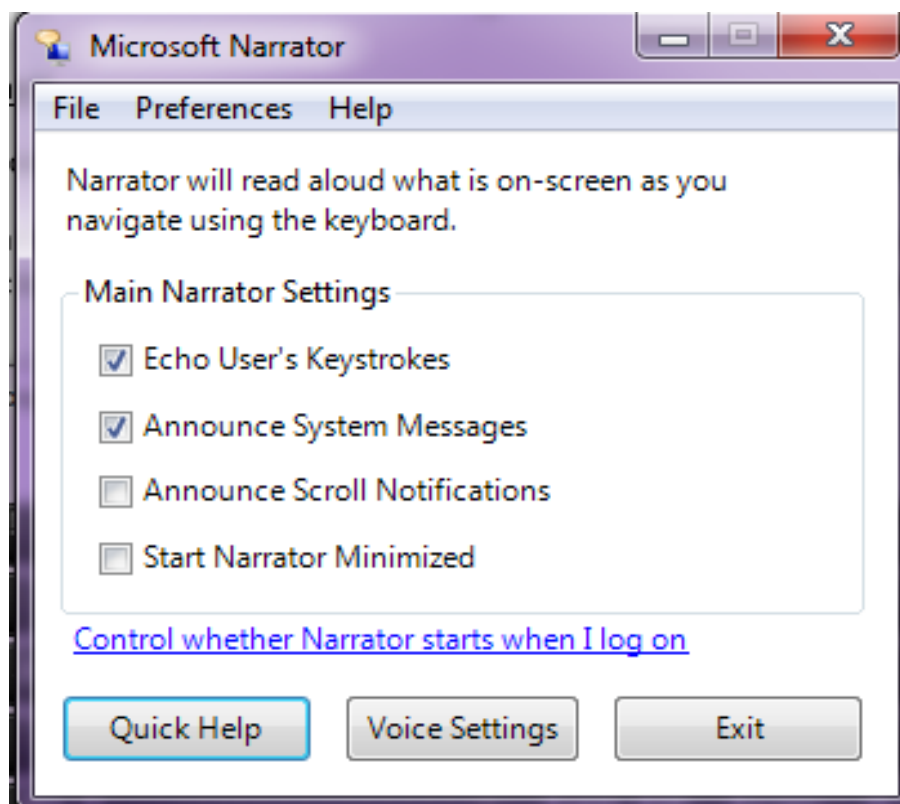
The below keyboard will appear on the screen for customers that only have ability to use the mouse. When done, you click on the box in the right hand corner of the on screen keyboard.



Narrator

Click on Start bottom, in Search box- type Ease of Access Center, Click on Start Narrator.

Choose the settings requested. Click on the red box when done or click on exit.



Explore all settings

When you select these settings, they will automatically start each time you log on.



[Use the computer without a display](#)

Optimize for blindness



[Make the computer easier to see](#)

Optimize visual display



[Use the computer without a mouse or keyboard](#)

Set up alternative input devices



[Make the mouse easier to use](#)

Adjust settings for the mouse or other pointing devices



[Make the keyboard easier to use](#)

Adjust settings for the keyboard



[Use text or visual alternatives for sounds](#)

Set up alternatives for sounds



[Make it easier to focus on tasks](#)

Adjust settings for reading and typing

From: [Gault, Steve](#)
To: [Maxey, Bonnie](#)
Cc: [Long, Jennifer](#)
Subject: FW: Assistive Workstation Training
Date: Friday, May 04, 2018 1:26:01 PM
Attachments: [Accessible Hardware Overview 1 page.pdf](#)
[Accessible Software Overview 1 page.pdf](#)
[DWD 2015 Hardware Quick Reference Guides.pdf](#)
[Jaws Quick Reference.pdf](#)
[Natural Reader Quick Reference.pdf](#)
[Windows Magnifier Quick Reference.pdf](#)
[Windows Speech Recognition Quick Reference.pdf](#)
[YouTube Training Video - workstation.docx](#)
[DWD Field Operations Assistive Work Station Training Survey.xlsx](#)
[Assistive Workstation Equipment and Software.docx](#)

Bonnie,

This is the email we sent with the self-training materials. I've also attached an Excel spreadsheet with the survey results and a Word doc listing of the hardware and software that the workstations contain. Questions, let me know.

Thanks.

From: Gault, Steve
Sent: Friday, December 01, 2017 3:48 PM
To: Angie Crossley (acrossley@workforcenet.org) <acrossley@workforcenet.org>; Deb Waymire (dwaymire@tap.lafayette.in.us) <dwaymire@tap.lafayette.in.us>; Edmond O'Neal (eoneal@neinworks.org) <eoneal@neinworks.org>; Jacqueline James (jjames@workoneregion10.com) <jjames@workoneregion10.com>; Kay Johnson <Kay.Johnson@workonesw.org>; Krystal Levi (klevi@gotoworkone.com) <klevi@gotoworkone.com>; Patricia Griffin (pgriffin@workonecentral.org) <pgriffin@workonecentral.org>; Richard Sewell (richards@workonesoutheast.org) <richards@workonesoutheast.org>; Robyn Minton <rminton@innovativeworkforce.com>; Marie Mackintosh (MMackintosh@EmployIndy.org) <MMackintosh@EmployIndy.org>; Shannon Laurent <slaurent@hotmail.com>; Lisa Price (lprice@asgcorp.org) <lprice@asgcorp.org>
Cc: Davisson, Nancy <ndavisson@dwd.IN.gov>; James, Kalena F <KJames@dwd.IN.gov>; Wray, Connie E <CWray@dwd.IN.gov>; Boyd, Marcus B (MBoyd2@dwd.IN.gov) <MBoyd2@dwd.IN.gov>; Ouattara, Ibrahim <IOuattara@dwd.IN.gov>
Subject: FW: Assistive Workstation Training

All,

Our approach to provide initial training on the Assistive Workstations is to provide the attached video training and product guides for staff to use to train themselves. The advantage of this approach is that it:

- Provides training now,
- Can be used in the future by new staff,
- Serves as a refresher for those trained in the past,
- Provides a reference available when needed,
- Provides hands on training,
- Avoids travel and time out of the office.

These materials were provided by Easter Seals and were used as a part of the training that was provided.

Regional Administrators should appoint at least two staff per WorkOne with an Assistive Workstation to complete this training as soon as practical but no later than January 15, 2018. When the training has been completed, Please provide the names and contact information of the trained staff to Steve Gault, DWD Field Operations. After the training has been completed, we will follow up with a survey on the effectiveness of this training method and whether additional is needed to complete this first round. Note that some WorkOnes may not have the exact hardware or software covered by these guides but a different kind that performs a similar function. In these cases, search the internet for guides and videos that can be used for training and reference or refer to materials that may have been shipped with it. If you need assistance using these materials or have other questions, please contact Steve Gault, sgault@dwd.in.gov or 812.675.2481 for assistance.

We are committed to ensuring staff can be effective and feel comfortable in using the tools of the Assistive Workstations to help customers receive the services they desire and this is a step in doing so.

Thanks.

DWD: DWD Home x +

in.gov/dwd/ Accessibility Settings Language Translation Governor Eric J. Holcomb

IN 90v An official website of the Indiana State Government **ENGLISH**

Accessibility Adjustments

Reset Settings Statement Hide Interface

Unclear content? Search in dictionary...

Choose the right accessibility profile for you

OFF	ON	Seizure Safe Profile Clear flashes & reduces color	
OFF	ON	Vision Impaired Profile Enhances website's visuals	
OFF	ON	ADHD Friendly Profile More focus & fewer distractions	
OFF	ON	Cognitive Disability Profile Assists with reading & focusing	
OFF	ON	Keyboard Navigation (Motor) Use website with the keyboard	
OFF	ON	Blind Users (Screen Reader) Optimize website for screen-readers	

Content Adjustments

Content Scaling +10%

Readable Font

Department of Workforce Development

Book a Virtual Appointment

Upcoming Job Fairs

Attend job fairs in your area!

High School Equivalency

Get your High School Equivalency

Indiana Unemployment

File for Unemployment

Video Vault

Watch Videos about DWD's Services

Web Accessibility Solution By accessiBe

SERVE INDIANA

Element 6: Data and Information Collection and Maintenance

[29 CFR 38.41 through 38.45]

Recipients must collect and maintain records on applicants, registrants, eligible applicants/registrants, participants, terminees, employees, and applicants for employment and must record race/ethnicity, sex, age, and where known, disability status. Beginning on January 3, 2019, each recipient must also record LEP and preferred language. Data collected must be stored in a manner that ensures confidentiality and used only for purposes of recordkeeping and reporting, determining eligibility for WIOA Title I-funded programs or activities, or other uses authorized by law.

Systems

Indiana Career Connect (ICC) is Indiana's job-matching and client tracking system. The web-based system may be accessed online or at terminals in WorkOne offices by both employers and job seekers to facilitate job-matching.⁸⁸ Employers may post job openings and find candidates. Job seekers can register for work, find job openings, and use other services, such as resume drafting, available on the website.

As part of DWD's demand-driven workforce system (DDWS) that provides job-matching, case management, and data collection services, ICC also collects and reports data for the programs administered by DWD. ICC collects data for applicants and participants receiving WIOA career services.⁸⁹ The State EO Officer is able to retrieve and cross-reference Job Service and demographic information from ICC. The collected information is examined during the monitoring process using a participant file review tool.⁹⁰ We continue to expand our efforts in collecting meaningful data.

Uplink is Indiana's portal for filing Unemployment Insurance (UI) claims, and is accessible online and in WorkOne offices. The State EO Officer is currently working with UI management to develop better system integration and enrich the quality and understanding of participant data. As a result, DWD has an assigned UI liaison who will be working closely with the state EO Officer which will expand our efforts in educating UI in the requirements of EO and section 188 of WIOA.

⁸⁸ See <http://www.indianacareerconnect.com>

⁸⁹ Documentation 6.1: WIOA ICC Application

⁹⁰ Documentation 6.2: WIOA Adult Participant File Review Checklist; See Element 7 for further detail on monitoring.

Records and Resources

Demographic information is collected at the [United States Census Bureau](#),⁹¹ which provides [several data tables with a demographic breakdown by counties](#). This is used in conjunction with the ICC reporting system, as outlined in Element 7's monitoring procedures.

Certain participant records, such as those containing medical information, are secured and kept separate from other information to ensure confidentiality.⁹² All participant data collected is retained for a period of three years from the date of application, and for complaints, three years after resolution of the complaint.⁹³

Each LWDA utilizes a formal Complaint Log⁹⁴ to record complaints filed that allege discrimination on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, citizenship status and/or participation in a WIOA Title I-financially assisted program or activity. The Local EO Officers submit the Complaint Log on a quarterly basis (April 5, July 5, October 5 and January 5) to the State EO Officer.

Enforcement

WIOA grant applicants and recipients must notify the State EO Officer of any administrative enforcement actions or lawsuits filed regarding discrimination. Additionally, the Director of CRC will be notified of any administrative enforcement actions and lawsuits against recipients that allege discrimination on one or more of the bases prohibited by WIOA Section 188.

⁹¹ See <https://data.census.gov/cedsci/>

⁹² 29 CFR 38.41. See also DWD Policy 2016-09 (Documentation 1.5) and Documentation 6.3: DWD Policy [2021-10: Safeguarding Protected Information and DWD User Accounts Management](#).

⁹³ 29 CFR 38.43; See Indiana Record Retention guidelines at <https://www.in.gov/iara/files/gr.pdf>.

⁹⁴ Documentation 6.4: Complaint Log

Element 6 Documentation

Documentation 6.1: WIOA ICC Application

Documentation 6.2: WIOA Adult Participant File Review Checklist

Documentation 6.3: DWD Policy 2021-10: Safeguarding Protected Information and DWD User Accounts Management

Documentation 6.4: Complaint Log

General Information				
Application Status: Application Complete, Ready For Enrollment				
Name: TESTERFIVE, FUND		SSN: XXX-XX-1678		
AppID: 4975424		WIA Converted App ID: Not Applicable		
State ID: 15292005		User ID: 3657838		
LWIA: Region 6		Office: WorkOne Muncie (Delaware County) Office of Responsibility: WorkOne Muncie (Delaware County)		
Assigned Case Manager:				
Application Date: 08/05/2021		Login Name: fundtester5@email.com		
Eligibility Dates				
Basic Core Date:	Adult Date: 08/05/2021	Dislocated Worker: 01/21/2022	Youth Date:	Incumbent Worker Date: 09/07/2022
Contact Information				
Current Address: 564 Banana Tree Lane Plymouth, IN 46563 US		County: Marshall County		
Mailing Address: 555 fund test Plymouth, IN 46563 US				
Eligibility Address: 555 fund test Plymouth, IN 46563 US Verified		County: Marshall County		
Primary Phone: (574)654-5456 Phone Type: Cell/Mobile Phone		Alternate Phone: Phone Type:		Fax:
Phone Mode:		Phone Mode:		
Email: fundtester5@email.com				
Demographic Information				
Date of Birth: 09/01/1945 Verified		Age: 75		Gender: Female
Selective Service: Not Applicable Verified		Authorized to work in US: Citizen of U.S. or U.S. Territory Verified		
Selective Service Registration Number: Not Available		Alien Registration Number: Not Available		
Selective Service Registration Date:		Alien Registration Expiration Date: Not Available		
Hispanic: No		Race: I do not wish to answer.		
Spouse or Caregiver of a Military Member				
Are you the spouse of a member of the armed forces who is on active duty? No				
Military Service				
Are you currently in the U.S. Military or a Veteran? Yes				
Are you within 24 months of retirement or 12 months of discharge from the military (Transitioning Service Member)? No				
Veteran Information:				
Most recent Active Duty Begin Date: 03/15/2014		Most recent Active Duty End Date: 07/01/2018		
Do you have prior service dates? No				
Disabled Veteran: No				
Homeless Veteran: Yes		Enrolled in Homeless Veterans' Reintegration Program: No		
Veteran Status: Yes, Eligible Veteran				

WIOA APPLICATION

Indiana Career Connect

Employment Information			
Employment Status: Not Employed Verified		If employed, under-employed: Not Applicable	
Unemployment Eligibility Status: Neither Claimant nor Exhaustee		UI Referred By: Not Applicable	
Claimant has been exempted from work search: No		Date claimant exempted from work search:	
Number of weeks Unemployed: 4		Meets Long Term Unemployed Definition: No	
Current or most recent Hourly Wage: \$23.00		Occupation of Most Recent Employment Prior to WIOA Participation: 15205101 Business Intelligence Analysts	
Termination/Layoff Information			
Reason for Layoff: None of the above. Individual does not meet the definition of Dislocated Worker. Verified			
Is unemployed due to general economic conditions in the community lived in, or worked in, or related to a military installation realignment: Not Provided			
Is unemployed as result of an emergency or natural disaster in the community lived in, or worked in: Not Provided			
Is considered long term unemployed, as defined by the state in the NDWG grant: Not Provided			
Actual Layoff Date:		Projected Layoff Date:	
Dislocation Employer Name: ABC Company		Employer Address: 123 ABC Drive Indianapolis IN 46204	
Dislocation Hourly Wage: \$20.00			
Attended Group Orientation: No			
Most Recent Date Attended Rapid Response Service:		Rapid Response Event:	
Education Information			
School Status: Not attending school; Secondary School Graduate or has a recognized equivalent - Verified			
Highest School Grade Completed: 12th Grade Completed			
High School Diploma or Equivalent received: Yes			
Highest Educational Level Completed: Attained a Bachelor's degree			
Education Partner Services			
Receiving services from Adult Education (WIOA Title II): Did not self-identify			
Receiving services from YouthBuild: Not Applicable		YouthBuild Grant Number:	
Receiving services from Job Corps: Did not self-identify			
Receiving Services from Vocational Education (Carl Perkins): Did not self-identify			
Individualized Education Program Participant: Not Applicable			
Barriers			
English Language Learner: No	Basic Skills Deficient/Low Level of literacy: No	Homeless: No	
	Ex-Offender: No		
Barriers to Employment			
Displaced Homemaker: No		Within 2 years of exhausting TANF lifetime eligibility: No	
Hawaiian Native: No	American Indian/Alaskan Native:		
Cultural barriers: No	Eligible migrant and seasonal farmworker as defined in WIOA Sec. 167(i) : No	Meets Governors special barriers to employment: No	
Eligible Migrant and Eligible Farmworker Status: No		National Farmworker Grant Number:	
Public Assistance			
Temporary Assistance for Needy Families (TANF):No		TANF Recipient:	

WIOA APPLICATION
Indiana Career Connect

General Assistance (GA): No	GA Recipient:
Refugee Cash Assistance (RCA): No	RCA Recipient:
Supplemental Nutrition Assistance Program (SNAP): Yes Verified	Receiving services under SNAP Employment & Training Program: No
Foster Child (state or local payments are made for applicant): No	Youth currently living in high-poverty area: No
Youth currently receives, or is eligible to receive free or reduced lunch under the Richard B. Russell National School Lunch Act : No	Receiving or been notified will receive any Pell Grant Monies: No

Income Information

Annualized Family Income:	Family Size:
----------------------------------	---------------------

Miscellaneous Employment

Prison to employment participant: No

Type of :

Post Release Classification:

Type of supervision:

Eligibility

Applicant meets the definition for Low Income: Yes	Youth applicant meets low income based upon living in a high poverty area or free/reduced school lunch: No
---	---

Dislocated Worker Eligibility: No Adult Eligibility: Yes	Youth Eligibility: Youth exception: Meets the 5% Exception and/or 5% Limitation (checkbox is displayed and is NOT checked)
---	---

WIOA Grant Eligibility

National Dislocated Work Grant NDWG (formerly NEG): Not Applicable	Statewide Adult Eligibility: Yes
Statewide Dislocated Worker Eligibility: Not Applicable	Statewide Youth Eligibility: Not Applicable
Incumbent Worker Eligibility: No	Statewide Rapid Response Additional Assistance: Not Applicable

Non-WIOA Program Eligibility

Non-WIOA Special Grants: Yes

Local Funded Grants: Yes

Grants Attached To This Application

Grant Type	Grant ID	Grant Name	ETA/Local Grant Code	Date Added
National DW Grant (NDWG)	151	R04 Employment Recovery Grant	/	01/21/2022
NonWIOA Special Grant	156	R04 H-1B Rural Healthcare Grant	/	11/16/2021
Statewide Adult	173	R04 PY21 WIOA Adult Performance Support Grant	/	03/11/2022

WIOA Miscellaneous Information

Meets the Additional Priorities established by the Governor and/or Local Board:

Youth of Incarcerated Parent: No

Substance Abuse: No

Lacks Transportation: No

Lacks Child Care: No

Staff Eligibility Information

Comments: usp_capp_save_intro

**WIOA APPLICATION
Indiana Career Connect**

Adult Review: Met Requirements : Not Applicable	Adult Review Date:	Adult Review Staff:
Dislocated Worker Review: Met Requirements : Not Applicable	Dislocated Worker Review Date:	Dislocated Worker Review Staff:
Youth Review: Met Requirements : Not Applicable	Youth Review Date:	Youth Review Staff:

Signatures

Applicant Certification Statement: (Not to be signed and dated until all documentation has been provided.) I certify that the information on this application is accurate to the best of my knowledge. I understand that my willful misstatement of the facts may cause my forfeiture of rights in the WIOA Program and may result in criminal action. I give permission for outside sources to be contacted and for them to disclose any information necessary to verify my eligibility for WIOA. I further understand and agree that my social security number and other information on this application will be provided to other government agencies if required by law.

Applicant Signature

Date

Staff Signature

Date

CONSENT TO RELEASE:

I TESTERFIVE, FUND give the Department of Employment Services (DOES) permission to gather and share information (Oral or Written) on me relating to the design, delivery and receipt of vocational services. I understand that my records are protected under confidentiality laws and information about my family or me cannot be disclosed without my written consent. I authorize employees and representatives of Department of Employment Services (DOES) to gain access to any and all confidential files about myself and/or family which may be in the possession of DC Department of Human Services or any other related party, including the agency which referred me to Department of Employment Services (DOES). I also make the same consent for exchange of information with any training institute I am enrolled in through Department of Employment Services (DOES), and my employer. This consent will include information placed in my records after the date signed below.

This consent will remain in effect for the period of my participation with Department of Employment Services (DOES). Consent may be terminated at any time upon receipt of a ☐Withdrawal of Consent☐ letter to the assigned program manager.

Signature for Confirmation:

I understand that the information obtained, gathered, discussed, and shared to assist me with attaining my vocational goals. I further understand that such actions are part of the development, design, and delivery of vocational services as a participation of the Department of Employment Services (DOES) workforce development program. I hereby certify that I understand this consent and that I have signed it of my own free will.

Applicant Signature

Date

Staff Signature

Date

EQUAL OPPORTUNITY IS THE LAW

It is against the law for agencies affiliated with this site to discriminate on the following basis:

- Against any individual in the United States, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief; and
- Against any beneficiary of programs financially assisted under Title I of the Workforce Innovation and Opportunity Act of 2014 (WIOA), on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his or her participation in any WIOA Title I-financially assisted program or activity.

Additionally, agencies affiliated with this site comply fully with the nondiscrimination and equal opportunity provisions of the following laws:

- Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the basis of race, color, and national origin;
- Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;
- The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age; and
- Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs.

WHAT TO DO IF YOU BELIEVE YOU HAVE EXPERIENCED DISCRIMINATION

If you think that you have been subjected to discrimination, you may file a complaint within 180 days from the date of the alleged violation with either the agency's Equal Opportunity Officer (or the person whom the agency has designated for this purpose); or The Director, Civil Rights Center (CRC), U.S. Department of Labor, 200 Constitution Avenue NW, Room N-4123, Washington, DC 20210.


For more information on filing a discrimination claim, visit the [Equal Employment Opportunity Commission website](#).

The U.S. Department of Labor oversees discrimination and equal opportunity enforcement through its [Civil Rights Center](#).

Auxiliary aids and services are available upon request to individuals with disabilities.

Applicant Signature

Date

 <div> IN DWD Compliance and Policy Division (Compliance Team) Participant File Review Checklist - WIOA Adult PY2021 </div>			
REGION:			
DATE OF REVIEW:			
TIMEFRAME FOR RECORDS PULLED:			
REVIEWER:			
Participant Name			
State ID Number			
Case Managers Name			
WorkOne Office Name			
1. PARTICIPANT ENROLLMENT DOCUMENTS			
Local application signed and dated			
What program(s), if any, is participant co-enrolled?			
Complaint/grievance process signed and dated			
Release of Information signed and dated			
If a veteran, there is a DD-214 or acceptable documentation			
Spouse of veteran			
NOTE: Documentation may exist as paper and/or electronic. NOTE: When reviewing records, be sure the application being reviewed corresponds with the current monitoring time period of the record for review (in case the participant has more than one application).			
COMMENTS			
2. GENERAL ELIGIBILITY CRITERIA			
18 years of age or older			
Eligible to work in the USA			
Registered with the Selective Service (if male born on/after Jan 1, 1960)			
Is the participant disabled?			
Is the participant a prior offender?			
Is the participant a UI claimant?			
Did the assessment process or case manager identify participant's interests/needs/etc.			
Did assessment identify any barriers? If so, how did they shape services received?			
COMMENTS			
3. SPECIFIC ELIGIBILITY REQUIREMENTS			
Documentation/self attestation indicates that participant is:			
EITHER:			
<ul style="list-style-type: none"> Receiving public assistance (lines 28-35), and/or Low income (lines 37-41), and/or Basic Skills Deficient (lines 43-46). 			
OR:			
<ul style="list-style-type: none"> None of the above (line 48) 			
Receiving PUBLIC ASSISTANCE: Participant (or his/her household) is receiving (or has received in the last six months) assistance from one of the following:			
Cash Public Assistance			
TANF			
Living in High Poverty Area			
SNAP			
Free/Reduced Lunch			
SSI			
General Assistance			
Refugee Cash Assistance			
LOW INCOME - Participant meets one of the following criteria:			
Individual receives, or is a member of a family that receives, assistance through one of the program listed above;			
As evidenced by case manager calculations comparing family's income with local standards, individual is in a family with total family income that does not exceed the higher of the poverty line or 70% of the Lower Living Standard Income Level (LLSIL);			
Individual is homeless			
Individual has a disability whose own income meets the income requirements above, but is a member of a family whose total income does not meet this requirement.			
NOTE: Income shown for each family member is documented with allowable sources, and identifies includable income (gross wages, salaries before deductions, non-farm self employment, farm self employment, alimony, etc.) and exclusionary income (SSI, TANF, scholarships, etc). Documentation should be signed and dated by participant.			
BASIC SKILLS DEFICIENT - Participant has one of the following criteria:			
Documentation indicates participant either lacks high school diploma/equivalency			
Scored 8.9 or below on TABE test			
Is enrolled in Adult Ed program or has poor English skills			
Case manager notes indicating observations of deficient functioning			
NONE:			
Documentation indicates that participant is low income, that their family is low income, or that the participant is basic skills deficient			
COMMENTS			
4. PRIORITY OF SERVICE (POS) ELIGIBILITY GROUPS			
Taking into account responses to Section 3 - Specific Eligibility Criteria, participant is in which Priority of Service Group:			
I: Veteran/Veteran Spouse receiving public assistance, low income, or basic skills deficient			
II: Other/Non-Veteran/Non-Veteran Spouse receiving public assistance, low income, or basic skills deficient			
III: Veteran/Veteran Spouse NOT receiving public assistance, low income, or basic skills deficient			
IV: None of the above			
COMMENTS			
5. CAREER SERVICES RECEIVED			
Has participant received career services? (If no, skip the remaining questions in this section.)			
I Basic Services			

1. Eligibility determination			
2. Initial skills assessment			
3. Labor exchange services			
4. Provision of information on program and services			
5. Partner program referrals			
II Individualized Career Services			
1. Comprehensive/specialized skills assessments			
2. Develop individual employment plan			
a. Initial IEP completed and signed by case manager and participant, or ICC case note indicates IEP was developed			
b. Initial IEP Date			
c. Includes employment/training goals			
d. Based on assessment results			
e. Updated as participant's plan changes			
3. Career counseling			
4. Work experience			
III Follow-up Services			
Indication of quarterly follow-up services after being placed in unsubsidized employment for up to 12 months after first day of employment?			
1. Adult mentoring			
2. Labor market information			
3. Financial literacy education			
4. Referral to community resources			
<i>NOTE: Only basic career services can be provided to individuals who are not in one of the Priority of Service groups:</i>			
COMMENTS			
6. TRAINING SERVICES			
Has the participant received training? (If no, skip the remaining questions in this section.)			
<i>NOTE: Training services can only be provided to individuals who are in one of the Priority of Service groups:</i>			
What training was provided?			
Who was the training provider?			
Is training provider on ICC Eligible Training Provider List?			
Were participant's resources (loans, grants, personal funds, etc.) to attend and complete the training were considered			
Has participant completed the training?			
<i>NOTE: If participant is on TAA, WIOA should not be paying for training services. WIOA is payer of last resort.</i>			
COMMENTS			
7. SUPPORTIVE SERVICES			
Has the participant received supportive services?			
What supportive services were provided?			
Were supportive services provided based on any assessment?			
Does case file indicate that participant was referred to other resources?			
What Documentation was provided to validate that supportive services are necessary in order for the individual to participate in WIOA services?			
Has individual received Needs-Related Payments?			
Does individual qualify for UI or TRA payments and therefore does not qualify for Needs-Related Payments?			
COMMENTS			
8. ON THE JOB TRAINING (OJT) & REGISTERED APPRENTICESHIP			
Has the participant received OJT or a registered apprenticeship? Indicate which one. (If no, skip the remaining questions in this section.)			
OJT identified on the IEP.			
<i>Refer to DWD Policy WIOA 1 (134)-P1-Attachment B for all required elements.</i>			
Assessment used to determine OJT training plan.			
What company/provider was used?			
What was the training's start/stop dates?			
What was the reimbursement rate?			
Document of factors used for any reimbursement over 50%.			
<i>NOTE: Justification is needed for reimbursement over 50%.</i>			
What were the start/end dates of contract?			
Participant determined eligible prior to hire date with OJT company?			
Contract signed and dated by all parties before OJT start date?			
What reimbursement docs are in participant file?			
WDB or service provider staff conducted on-site monitoring during the term of the contract?			
COMMENTS			
9. EXIT INFORMATION			
Has the participant exited from services? (If no, skip the remaining questions in the document.)			
Date of exit.			
Exit Reason:			
Employment			
Education - Name of credential and date issued			
Exclusionary exit documented (if applicable). People exited from being counted in performance date (incarcerated, deceased, moved out of area, extended medical leave etc).			
Other (voluntarily stopped participating)			
COMMENTS			
10. FOLLOW-UP INFORMATION			
Date of last direct contact:			
Was the participant offered follow-up services?			
Has the case manager done quarterly follow-ups?			
When was the last quarterly follow-up done?			
COMMENTS			



To: All DWD Staff, Vendors/Contractors and Service Providers

From: Indiana Department of Workforce Development (DWD)

Date: March 8, 2022

Subject: DWD Policy 2021-10
Safeguarding Protected Information and DWD User Accounts Management

Purpose

This policy states the guidelines and requirements for the appropriate access, use, storage, and disposal of confidential or privileged information, including sensitive and non-sensitive Personally Identifiable Information (PII; collectively “protected information”¹), maintained by the Indiana Department of Workforce Development (DWD) or any vendor or contractor providing services to DWD, as well as any entity providing services to or through DWD. This policy also outlines requirements for DWD user accounts management as part of DWD’s overall protection of information strategy. This policy supplements and is not intended to displace other applicable policies, user agreements, or agency guidance² unless otherwise specified.

Rescission

- DWD Policy 2013-03 *Requirements Pertaining to Confidential and Privileged Information*
- DWD Policy 2007-46 *Guidance on the Proper Handling of Social Security Numbers*
- DWD Policy 2003-17 *Computer Use Policy*

References

See Attachment B

Definitions

Confidential Information – Information that has been so designated by statute, promulgated rule, or regulation, based on statutory authority which does not permit public access to, or requires the protection, storage, disposal, and appropriate use of the information for official lawful purposes. Information and records of DWD relating to unemployment tax or the payment of unemployment insurance benefits, SSA Unemployment Insurance Inquiry (UIQ) responses, IRS Federal tax information (FTI), student educational data, medical records, as well as information which may reveal the individual’s

¹ Confidential or privileged information, including sensitive and non-sensitive Personally Identifiable Information (PII) will be referred to as “protected information” throughout this policy.

² Examples include but limited to DWD Memorandum 2020-15, agency contracts, and systems-related agreements such as the ICC’s User Agreement.

or an entity's identity, are confidential pursuant to state and federal laws and regulations governing protected information.

Privileged Information – Privileged information is available only to authorized persons. Authorization is determined by one's position within DWD or through partnership in contractual relationships with the State of Indiana or any subcontracted entity funded in whole or in part by grants or contracts with DWD. Privileged information is not confidential pursuant to the law but is sensitive in nature. Privileged information is subject to the same restrictions and requirements as confidential information for purposes of this policy. All protected information should be handled properly.

Personally Identifiable Information (PII) – Personally identifiable information (PII) is any information that can be used to distinguish or trace an individual's identity, either by itself or when combined with other PII, that is linked or is linkable to an individual. Both confidential and privileged information may contain PII. PII can be further delineated as sensitive PII (protected PII) and non-sensitive PII.³

Sensitive or protected PII includes any information that, if disclosed, could result in harm to the individual whose name or identity is linked to that information. Examples include, but are not limited to, social security numbers, IRS FTI, SSA UIQ response information, driver's license ID information, biological information, email/postal addresses, credit or debit card numbers, bank account numbers, personal telephone numbers, ages, birthdates, marital status, spouse name, educational history, medical history, financial information, and computer usernames and passwords.

Non-sensitive PII is information that, if disclosed by itself, could not reasonably be expected to result in personal harm to the individual whose name or identity is linked to that information. Examples include, but are not limited to, first and last names, general education, credentials, gender, or race. However, depending on the circumstances, a combination of non-sensitive PII could potentially be categorized as sensitive PII.⁴

Information that has been properly aggregated and suppressed is outside the scope of this policy and is not considered "protected information." For the purposes of providing aggregated and suppressed data, no cell can have a count of fewer than ten (10). In addition to this primary suppression, cells must also be secondarily suppressed. Secondary suppression ensures that for a given set of data, it is not possible to derive the value of any cell with fewer than ten (10) cases from the aggregated data (such as subtracting the unsuppressed value from the total). Questions regarding proper aggregation and suppression procedures should be directed to DWD's Data Officer.

State Property – All information, including but not limited to documents, software, files, data, faxes, phone call recordings, and emails created, accessed, transmitted, or stored electronically or in paper form, related to the nature of the contractual relationship while employed by, or partnered in, a contractual relationship with the State of Indiana or any of its subcontracted entities shall be considered the exclusive property of the State of Indiana.

³ TEGL 39-11 https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7872.

⁴ TEGL 39-11 page 2.

Content

All individuals and organizations with authorized access to protected information are obligated to ensure the protection and appropriate use of the information. State employees and those who have a business relationship⁵ with DWD are subject to State and Federal requirements for safeguarding protected information, which applies to any entity, organization, or individual providing services connected to or through DWD or the WorkOne American Job Center (WorkOne/AJC) workforce system. Those subject to the State and Federal safeguards are prohibited from divulging or benefitting from, or permitting any person to benefit from, protected information.⁶

Universal Requirements for DWD Staff, Vendors/Contractors, and/or Service Providers

Accessing Protected Information

DWD staff, vendors/contractors, and service providers may only access protected information to the extent they have permission or authority. The individual accessing the data must have a bona fide business reason at the time the data is accessed.

The accessing, processing, or storing of any protected information on personally owned equipment, at an off-site location (e.g., an employee's home), or on non-grantee managed IT service is strictly prohibited unless approved by DWD.

Sharing, Sending, and Receiving Protected Information

All exchanges of protected information require an Information Exchange Agreement (IEA)⁷ that includes content on safeguarding protected information.

The sharing of protected information requires appropriate approvals by both the sending and receiving parties, which is done via a Data Sharing Agreement (DSA). Protected information sourced from one entity cannot be shared without the express approval of the entity that provided the protected information.

If protected information is unexpectedly received, encountered, or sent to an unintended recipient by DWD staff, vendors/contractors, or service providers, the incident is to be reported to your direct supervisor, the DWD Chief Information Officer (CIO) and the DWD General Counsel.⁸

Storage, Retention, and Destruction of Protected Information

DWD staff, vendors/contractors, and service providers are responsible for ensuring that protected information is properly filed and stored when their workspace is unattended. Documents containing this type of information must never be left unattended and must be stored in a secure location when not in use. Additionally, all work computers, laptops, cellphones, and other devices must be locked when unattended in accordance with the IOT IRUA to prevent unauthorized access.

⁵ The definition of "business relationship" in IC 4-2-6-1(a)(5) includes the dealings a person has with an agency seeking, obtaining, establishing, maintaining, or implementing a pecuniary interest in a contract (including a grant agreement) with an agency.

⁶ Indiana State Code of Ethics <https://www.in.gov/ig/ethics-code/> and IAC 1-5-1.0 and 11.

⁷ Generally, IEA are required for data extracts and are not required for normal business exchanges.

⁸ See the *Security Breach* section of this policy for contact information for the CIO and General Counsel.

It is not permissible to email, fax, copy, print, export, store, discuss over the phone, dispose of, or electronically transfer protected information without proper permission or authority from your supervisor. Additionally, upon approval, all protected information containing personally identifiable information transmitted via file transfer protocol, voice⁹, email, or stored on CDs, DVDs, USB storage devices, or any other mobile or portable storage devices, must be encrypted using a Federal Information Processing Standards (FIPS) 140-2 compliant and National Institute of Standards and Technology (NIST) validated cryptographic module. However, staff are prohibited from emailing unencrypted protected information that contains sensitive personally identifiable information to any person or entity.¹⁰

The storage of non-business-related content or unapproved software on State-issued devices is not permitted.

DWD staff must use the secure email process made available by State of Indiana IOT or other encrypted email methods to send emails that contain protected information.

All protected information must be retained and destroyed in accordance with the Record Retention schedule administered by the Indiana Archives and Records Administration (IARA).¹¹ Indiana Code 5-15-5.1-13,¹² requires that confidential records must be destroyed in such a manner that they cannot be “read, interpreted, or reconstructed.” Large retention and/or record destruction requests must be made according to IARA standards.¹³

Records, printouts, notes, and documents, that have reached the end of their required retention period and are no longer needed and that contain protected information, must be securely shredded. Electronic media and hardware must be disposed of according to IARA and IOT procedures.

Photographs and Video Recordings

The unauthorized use of cameras, including cell phone cameras or video cameras, by DWD staff, vendors/contactors, or service providers is prohibited while on WorkOne/AJC, DWD, or remote work premises. Cameras that are used for business reasons or to document special occasions, such as retirement, birthday, or award celebrations, must only be used with the immediate supervisor’s approval and all photographs or video recordings must be limited to the subject area.

Social Media

DWD staff, vendors/contactors, and service providers are prohibited from posting any protected information on any social media platform.

Required Staff Training

DWD staff and vendors/contractors that use State of Indiana technology tools and resources are required to complete IOT’s Information Resources Use Agreement (IRUA) when they are hired or receive their vendor or State contractor account and then every two (2) years thereafter.

⁹ The term “voice” includes voicemail and other unencrypted digital, electronic, and analog recordings.

¹⁰ TEGL 39-11 https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=7872

¹¹ IARA Record Retention Schedules for DWD <https://www.in.gov/iara/3276.htm>

¹² Indiana Code 2020 Session IC 5-15-5.1-13 <http://iga.in.gov/legislative/laws/2019/ic/titles/005#5-15>

¹³ IARA Destroying Records <https://www.in.gov/iara/3210.htm>, IARA Policy 20-01, Electronic Records Retention and Disposition <https://www.in.gov/iara/files/policy-20-01-erecords-retentionanddisposition.pdf>, and Electronic Records Technical Standards IARA Policy 20-02 <https://www.in.gov/iara/files/policy-20-02-erecords-technicalstandards.pdf>.

DWD staff, vendors/contractors, and service providers are required to adhere to the following:

- Security safeguards set forth in this DWD agency policy; and
- All IOT and DWD policies and procedures as published within Archer,¹⁴ the State's governance, risk, and compliance tracking system.

Additionally, all DWD staff are required to adhere to the State Employee Handbook and must complete all IOT's monthly cyber security training modules by the specified deadline.

Accessing State Facilities

- All DWD staff are required to wear State ID badges visibly, on their person.
- When entering a secure area via the scanning of your badge, do not allow others without a visible, valid badge to enter (piggyback) immediately behind you. Notify security and/or the DWD Director of Facilities if this happens.
 - For the Indiana Government Center, notify State's Security Control:
 - (317) 234-4838 (unless it becomes an emergency, which would then be 911)
 - For other locations:
 - Please follow the location's standard procedures
- Visitors to DWD offices in state facilities must sign in and be given a visitor's badge (where available). Visitors should be escorted within state facilities.

Access to the State Network Outside of the U.S.¹⁵

- State devices that can connect to the State network via a wired, wireless, or remote VPN connection are not permitted to be taken outside the United States.
- DWD staff and vendors/contractors are **not** permitted to access the State network from outside the United States via non-State issued devices.

Security Breach

A security breach is the unauthorized acquisition of protected information that compromises the security, confidentiality, or integrity of that information. DWD staff, vendors/contractors, and service providers who become aware of any security breach resulting from the inadvertent or intentional disclosure of any protected information shall immediately inform, in person or via phone, the following:

- Their direct supervisor;
- The DWD Chief Information Officer (CIO), (317) 234-8371; and
- The DWD General Counsel, (317) 234-8451.

Notification via an email or text is not sufficient but can be used as follow-up to the phone call and/or in person notification.

Violation of Data Security Requirements

DWD staff, vendors/contractors, and service providers who fail to abide by the security requirements and appropriate use standards for protected information contained herein may be subject to disciplinary action up to and including termination of employment.

¹⁴ <https://grc.iot.in.gov/RSAarcher/apps/ArcherApp/Home.aspx>.

¹⁵ Exceptions may apply but will require the approval of the DWD IT CIO and/or the DWD Security Officer, DWDServiceDesk@dwd.in.gov, and will be limited in duration.

DWD staff, vendors/contractors, and service providers who access or use protected information beyond the scope of authority granted to them or without a legitimate business will be subject to disciplinary action up to and including termination of employment.

A person who knowingly or intentionally exerts unauthorized control over the property of another commits criminal conversion, a Class A misdemeanor under Indiana Code 35-43-4-3(a).¹⁶ Therefore, DWD staff, vendors/contractors, and service providers who use State property, including documents, records, or data for personal reasons and without a legitimate business reason can be charged with criminal conversion. Additionally, the unauthorized use of data related to a federal program can be subject to additional federal criminal prosecution and civil enforcement actions that may result in a fine and/or imprisonment.

As reflected in the IRUA, agreed upon by DWD staff and vendors/contractors, anyone knowingly or intentionally accessing State of Indiana or U.S. government information resources without authorization can have their employment or contract terminated, be prosecuted where applicable, and face fines/imprisonment if found guilty.

Additional DWD Staff-Specific Requirements

DWD Staff Account Access

DWD supervisors are required to submit a request to the DWD Service Desk¹⁷ whenever:

- A subordinate needs access to a computer, network, server, directory folder, application, or database, that processes or stores protected information.
- Creating, modifying, disabling, or deleting an account (network/application/database).
 - Requests to disable/terminate account access for staff that will no longer be working for the agency must be submitted in a timely manner.
- Supervisors are also required to ensure staff have the appropriate level of training on safeguarding protected information before submitting an access-related account request.

FTI and UIQ Response Requirements

The following applies to specific DWD staff that have a business reason to access FTI and UIQ response data:

- DWD staff having access to IRS FTI is required to complete the following:
 - Annual Treasury Offset Program Security (TOPS) role training modules; and
 - DWD's specific FTI handling role training module.
- Security Background Checks
 - DWD staff having authorized access or potential access to IRS FTI are required to be fingerprinted and submit to an enhanced background check by the FBI.
- It is not permissible to email, fax, copy, screenshot, print, or save IRS FTI or SSA UIQ response data to any storage media, other than within the Uplink and/or Contact Center applications.
 - If IRS FTI and/or SSA UIQ response data is inadvertently mishandled, direct supervisor, the DWD Chief Information Officer (CIO) and the DWD General Counsel.¹⁸

¹⁶ Indiana Code 2020 Session IC 35-43-4-3(a) <http://iga.in.gov/legislative/laws/2019/ic/titles/035#35-43-4-3>

¹⁷ Send requests to <https://www.in.gov/dwd/intranet/dwd-service-desk/>.

¹⁸ See the *Security Breach* section of this policy for contact information for the CIO and General Counsel.

- DWD supervisors and Account Control administrators are required to adhere to DWD Policy 2017-08 Suitability Standards for Department of Workforce Development Employee and Contractor Access to Federal Taxpayer Information when requesting, authorizing, and granting access to IRS FTI.
- If IRS FTI is inadvertently printed, it must be shredded and logged. To log the incident, please notify the DWD Security Officer.¹⁹

Universal Acknowledgement Requirement

All DWD staff, vendors/contractors, and service providers shall read, acknowledge, and abide by this and all applicable agency policies, state and federal regulations, and state and federal statutes governing the access, use, and distribution of protected information.²⁰ All DWD staff, vendors/contractors, and service providers shall agree to access protected information for authorized business purposes only and to abide by all other requirements and terms contained therein. This policy supplements and is not intended to displace other applicable policies, user agreements, or agency guidance unless otherwise specified.

Action

All DWD staff, vendors/contractors, and service providers shall be made aware of and agree to adhere to the requirements of this policy.

Contents of this policy will be part of routine DWD monitoring.

Effective Date

Immediately.

Ending Date

Upon rescission.

Attachments

Attachment A - DWD User Accounts Management

Attachment B - References

Additional Information

Questions regarding the content of this publication should be directed to DWD Policy: policy@dwd.in.gov.

¹⁹ Notifications are to be sent via email to DWDServiceDesk@dwd.in.gov and jmcquiston@dwd.in.gov.

²⁰ Examples include but are not limited to IC 4-1-6, TEGL 39-11, this policy, DWD Memorandum 2020-15, and all systems-related agreements such as ICC's User Agreement, and IOT's IURA.

Attachment A

DWD User Accounts Management

DWD Account Access Types

Types of access accounts requiring security compliance oversight (described further below), include but are not limited to:

- State network account access for individuals
- Contractor account
- Temporary account (temps, interns, vendors, service providers, ...)
- Elevated privileged administrator accounts
- Service accounts

Types of access privileges to State resources requiring security compliance oversight (described further below), include but are not limited to:

- State applications such as Email, PeopleSoft, remote VPN, RightFax, SharePoint, ...
- DWD applications such as Uplink, COMPAS, Bomgar, ICC, CRM, ...
- DWD application access roles/levels such as Admin, SuperUser, TOP_INTERCEPT, ROLE_TOP_HOLD, Tax_Clearance,
- Individual's home directory access
- Shared directory access
- Remote access

DWD Account Access Maintenance Security Safeguards

To create, modify, disable, or remove account access to State resources, by employees, contractors, temps, interns, vendors or service providers, staff are required to adhere to the following security safeguards:

- "New Hire" employee/contractor/temp/intern computer/network account creations require authorization by the hiring manager.
- Temporary network account creations for short term technical support by a vendor/contractor/service provider require authorization by the system owner.
- Isolated elevated privileged account creations solely for administrator duties requires authorization by the system owner.
- Service accounts creations require authorization by the system owner.
- Intra-agency position transfers require authorization by department managers.
- Modifying, disabling, or removing a computer/network account of a voluntary or involuntary terminated employee requires authorization by a department manager.
- Reassignment/disablement/removal of objects tied to an account (email, home directory, application work items, ...) require authorization by a department manager or authorized designee.
- Application account role/level access maintenance requires authorization by a department manager or authorized designee.
- File directory permissions maintenance requires authorization by a department manager or authorized designee.
- VPN remote access requires authorization by a department manager or authorized designee.

- Database user account maintenance requires authorization by a DWD IT manager.
- Database application account maintenance requires authorization by the DWD IT system owner.
- DWD Account Control will ensure contractor accounts do not have access to IRS FTI or SSA UIQ response data via an application account/role or file directory permissions.
- DWD DBAs will ensure contractor database accounts do not have access to IRS FTI or SSA UIQ response data.
- DWD Account Control is not permitted to initiate account maintenance without an authorizing supervisor's request and approval.²¹
- To perform the actual account maintenance, DWD Account Control reviews a supervisor's request²² for security compliance and then submits a ticket request to IOT to execute the account maintenance.
- IOT staff are not permitted to initiate account maintenance without DWD Account Control's authorizing ticket request.
- Exemptions to the following default settings may be requested²³ and authorized by a manager:
 - Enable the disabling of exporting data from a State workstation's USB port.
 - Enable a DWD worker access to a prohibited internet site.
 - Enable a DWD IT administrator to install non-whitelisted software on a State device
 - Enable storage to a 3rd party storage service provider (e.g., GoogleDrive, DropBox, ...).

DWD Account Access Monitoring/Logging Oversight

- DWD Account Control reviews the status of accounts monthly for inactivity and will disable or remove accounts/roles/access as necessary.
- Access to servers is monitored via the QRadar network activity logging tool, with access being reviewed weekly by the DWD Security team.
- Access to SSA UIQ response information via the Uplink application is logged and is reviewed weekly by the DWD Benefits Payment and/or DWD Security teams.
- Access to the IRS FTI database schema via Oracle accounts is logged and is reviewed weekly by the DWD Security team and the DWD lead DBA.
- Access to IRS FTI via the Uplink application is logged and is reviewed weekly by the DWD Security team.
- Unauthorized access attempts to the IRS FTI database schema are systematically captured and reported immediately to the DWD IT security officer and appropriate IT management and are immediately investigated.
- State workstations and servers are scanned every 6 hours for software vulnerabilities and reported to a central collector. Other devices are scanned monthly. Owners of the most vulnerable workstations and servers are notified periodically of their situation. Identified workstations having malicious software are either rectified or disabled and reimaged.
- Requests, approvals, and maintenance related to account access maintenance are retained for at least 7 years, both by DWD's Service Desk Ticketing application and IOT's vFire HelpDesk ticketing tracking system.
- DWD DBAs ensure DWD contractors do not have access to IRS FTI schema logs.

²¹ Requests are to be emailed to DWDServiceDesk@dwd.in.gov.

²² Requests are to be emailed to DWDServiceDesk@dwd.in.gov.

²³ Requests are to be emailed to DWDServiceDesk@dwd.in.gov.

DWD/SPD Human Resources Oversight

- Account control management of PeopleSoft Time and Labor.

DWD Accounting Oversight

- Account control management of PeopleSoft Financials (EnCompass).

Attachment B References

- Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g, 34 CFR 99
- Federal Information Security Management Act of 2002 (FISMA)
- Privacy Act of 1974
- Social Security Act of 1935
- Computer Security Act of 1987
- 26 U.S.C. § 3304(a)(16) and 6103
- 29 U.S.C. § 3341
- 42 U.S.C. § 503 and 654a(d)(1)-(5)
- 20 CFR 603
- I.C 4-1-6
- I.C. 4-1-8
- I.C. 4-1-10
- I.C. 4-1-11
- I.C. 4-3-26
- I.C. 5-14-3-6.5
- I.C. 22-4-19-6
- I.C. 24-4.9
- TEGL 39-11 *Guidance on the Handling and Protection of Personally Identifiable Information (PII)*
- IRS Publication 1075
- NIST Special Publication (SP) 800
- SSA Technical Systems Security Requirements (TSSR) version 8.0, 12/2017
- OMB Circular A-130 (revised) *Managing Information as a Strategic Resource*
- IARA Policy 20-01 *Electronic Records Retention and Disposition*²⁴
- IARA Policy 20-02 *Electronic Records Technical Standards*²⁵
- DWD Policy 2017-08 *Suitability Standards for Department of Workforce Development Employee and Contractor Access to Federal Taxpayer Information*

²⁴ <https://www.in.gov/iara/files/policy-20-01-erecords-retentionanddisposition.pdf>

²⁵ <https://www.in.gov/iara/files/policy-20-02-erecords-technicalstandards.pdf>



COMPLAINT LOG

State Form 46001 (R3 / 4-16)

INDIANA DEPARTMENT OF WORKFORCE DEVELOPMENT

[illegible]

242

Element 7: Monitor Recipients for Compliance

[29 CFR 38.51 and 38.53]

Monitoring in the form of desk reviews, on-site reviews, and data analysis contribute to continued, robust implementation of WIOA Section 188 and 29 CFR Part 38. The coordinated efforts of the State and Local EO Officers and the DWD Compliance and Policy Workforce Division Monitoring Unit ensure monitoring and compliance of the Local Areas.

Monitoring

Each of the twelve LWDAs are reviewed annually for compliance with the nondiscrimination and EO requirements of WIOA Section 188 and 29 CFR Part 38 through a combination of desk review, on-site monitoring, and data analysis. If the review reveals disparities in services rendered, the State and/or Local EO Officer will conduct a follow-up investigation to determine if the differences are due to discrimination. This will be done through a variety of techniques such as interviews and records review.⁹⁵

Monitoring is based on:

- Desk reviews;
- On-site reviews;
- Complaint records;
- The review and analysis of data output reports from the ICC System and the **United States Census Bureau**;⁹⁶ and
- Reports from DWD Oversight Program Monitors or other interested parties

At the regional level, Local EO Officers are responsible for monitoring in their respective LWDAs. In addition to the training powerpoints, the State EO Officer disseminated an optional sample Local Monitoring Tool to the Local EO Officers to help guide their monitoring and provide a framework for their efforts.⁹⁷

Desk Review

The state-level annual EO monitoring process begins with desk review, where each LWDA completes a pre-monitoring tool and submits relevant documentation to the Compliance and

⁹⁵ Documentation 7.1 Excerpt from Local EO Officer NDP Training Element 7 PowerPoint

⁹⁶ Documentation 7.2: ICC Reports; Documentation 7.3 United State Census Bureau Reports

⁹⁷ Documentation 7.4: Local EO Monitoring Tool

Policy Workforce Division Monitoring Unit and State EO Officer.⁹⁸ LWDA's submit information such as:

- Local EO policies
- Job description of the Local EO Officer
- EO Notice requirements
- Complaint procedures
- Contracts, training agreements, and Memoranda of Understanding (to review for required nondiscrimination language)

The State EO Officer reviews the survey responses on the pre-monitoring tool along with the document assessment and data review to make an initial evaluation of compliance and prepare for on-site reviews.

On-site Reviews

The State EO Officer conducts annual on-site reviews concurrently with the Compliance and Policy Workforce Division monitoring team to ensure compliance with the equal opportunity and nondiscrimination provisions of Section 188 and 29 CFR Part 38.⁹⁹ These reviews consist of interviews with the Local EO Officer as well as assessments of the WorkOne offices **and interviews with WIOA case managers.**

The interviews are guided largely by the EO Monitoring Tool, which is modeled after the nine elements of this NDP and 29 CFR Part 38.¹⁰⁰ On-site structural accessibility, parking for individuals with disabilities, designated restrooms, appropriate notice and signage, program accessibility, and effective communication with persons with disabilities are some of the elements monitored by the State EO Officer and/or Compliance and Policy Workforce Division Monitoring staff.

Data Analysis

The State EO Officer has utilized two different types of data analyses during each LWDA monitoring, which allowed for examination of different types of data to understand potential sources of discrimination or lack of outreach. An adverse impact data analysis was completed on each LWDA's WIOA participant demographics.¹⁰¹ The data analysis included race, gender, and disability status and analyzed if there is potential discrimination in basic career services, individualized career services, and training services for WIOA participants. A standard deviation analysis was completed on each LWDA's WIOA participant demographics in comparison to

⁹⁸ Documentation 7.5: DWD EO Pre-Monitoring Tool

⁹⁹ Documentation 7.6: PY **2022-23** LWDA Monitoring Schedule

¹⁰⁰ Documentation 7.7: DWD EO Monitoring Tool

¹⁰¹ **Documentation 7.8: Adverse Impact Data Analysis Example**

United States Census labor force population for that LWDA.¹⁰² The data analysis included race, gender, disability status, age, LEP status, and ethnicity. The State EO Officer plans to run either or both analyses in future monitoring as well as monitoring each LWDA for completing their own data analysis, interpretation and investigation of the results, and implementation of potential plans for resolving discrepancies their data analysis exposed. Both data analyses have been presented to the Local EO Officers during quarterly conference calls and during annual monitoring.¹⁰³ Additional individual training from the State EO Officer has been offered.

Findings & Resolution

A formal monitoring report is issued to each LWDA following the annual monitoring review process. The State EO Officer collaborates with Compliance and Policy Workforce Division Monitoring staff to incorporate an EO segment into each report. The monitoring reports recognize best practices, areas of concern, and compliance findings that require corrective action.¹⁰⁴ All findings are detailed and tracked through report close-out utilizing a formal resolution process.¹⁰⁵

¹⁰² Documentation 7.9: Standard Deviation Data Analysis Example

¹⁰³ See Documentation 1.13

¹⁰⁴ Documentation 7.10: Sample Monitoring Report

¹⁰⁵ See Element 9, Documentation 9.1

Element 7 Documentation

Documentation 7.1: Excerpt from Local EO Officer NDP Training Element 7 PowerPoint

Documentation 7.2: ICC Reports

Documentation 7.3: United States Census Bureau Reports

Documentation 7.4: Local EO Monitoring Tool

Documentation 7.5: DWD EO Pre-Monitoring Tool

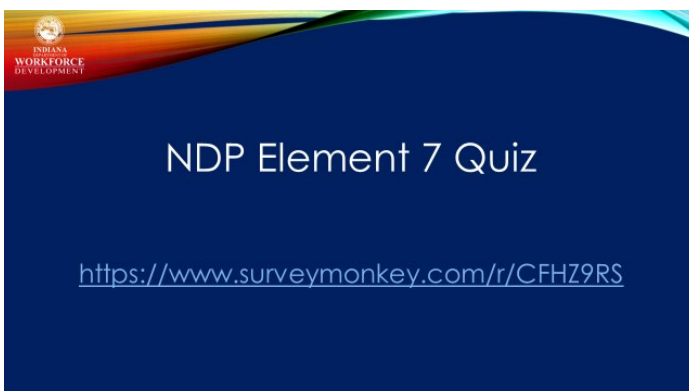
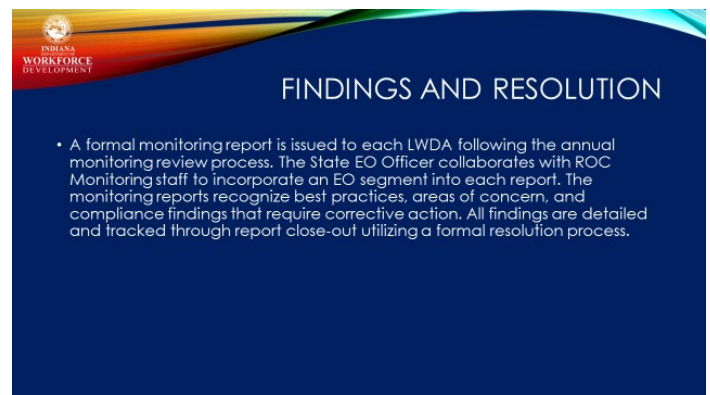
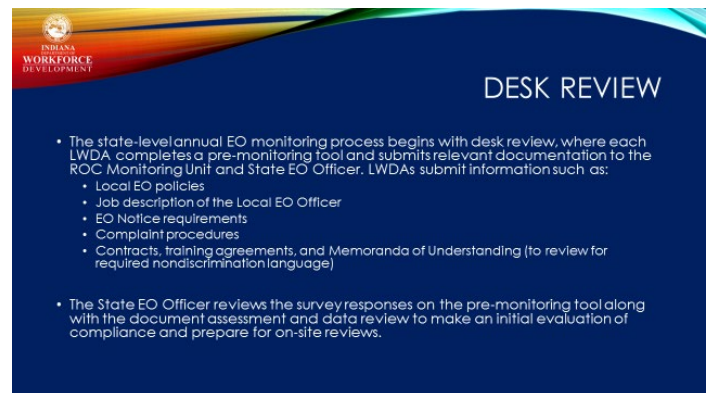
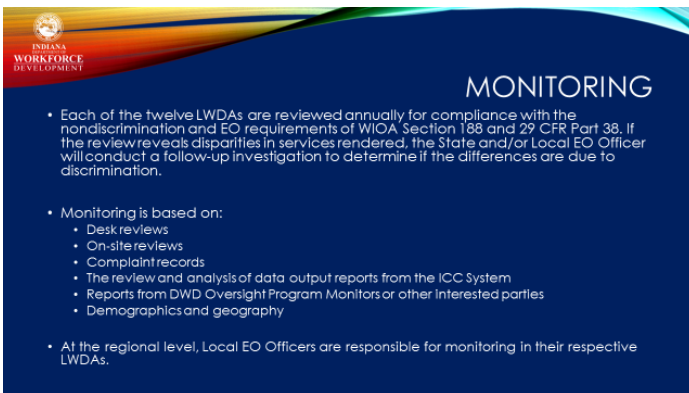
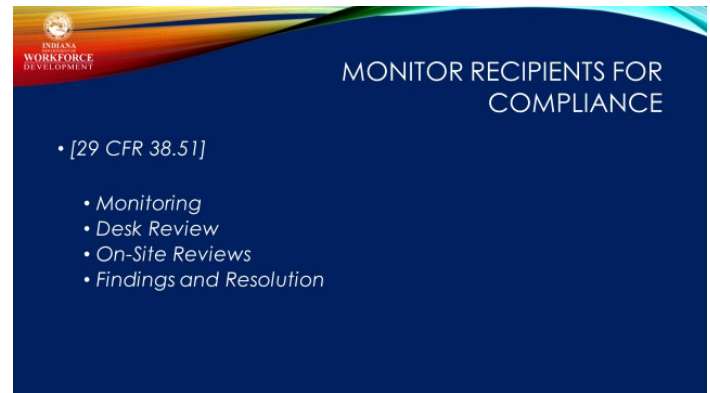
Documentation 7.6: PY 2022-23 LWDA Monitoring Schedule

Documentation 7.7: DWD EO Monitoring Tool

Documentation 7.8: Adverse Impact Data Analysis Example

Documentation 7.9: Standard Deviation Data Analysis Example

Documentation 7.10: Sample Monitoring Report



Indiana Career Connect - Reports

indianacareerconnect.com/vosnet/Reports/ReportMenu.aspx?ml=2&rid=&nav=3&grp=8&cat=&subcat=

workoneworks.com

Menu Home Accessibility My Dashboard Sign Out Services for Individuals Services for Employers Quick Search

Reports displaying the most common assessment results for a particular area or region.

- ▶ **Background Information**
Information from data provided by registered individuals to the system through the Background Wizard, including drivers license type and endorsements, desired salary, education, and work experience.
- ▶ **Contact**
Reports listing contact information to assist staff members in contacting individuals.
- ▼ **Enrolled Individual**
View reports on enrolled individuals by various criteria, such as age, education and work status, with filters by program, subprogram, type, county, or veteran status, among others.
 - ▼ **Enrolled**
 - [by Age](#)
 - [by Cookie Location](#)
 - [by Desired Occupation](#)
 - [by Educational Achievement](#)
 - [by Gender](#)
 - [by Hispanic Ethnicity](#)
 - [by NEG Grant](#)
 - [by Race](#)
 - [by Registration Source](#)
 - [by Staff Assigned](#)
 - [by Ward/Borough/Township](#)
 - [by WIOA 15 Percent Grant](#)
 - [by Work Status](#)
 - [by WP Special Program](#)
 - [List](#)
 - [by Attending School Status](#)
 - [by County/Parish](#)
 - [by Disability Status](#)
 - [by Employment Status at Participation](#)
 - [by Grant by Zip Code](#)
 - [by Migrant/Seasonal Farm Worker Types](#)
 - [by One Stop Office](#)
 - [by Region/LWIA](#)
 - [by Selective Service Registration](#)
 - [by Unemployment Status](#)
 - [by Web Site Access Location](#)
 - [by WIOA Partner Program](#)
 - [by Working in Agricultural ONET Occupation Code Status](#)
 - [by Zip Code](#)
 - ▼ **Summary**
 - [Repeat Customer](#)
 - ▼ **Veteran**
 - [by Discharge Status](#)
 - [by Potential Eligibility for Veteran Benefits](#)
 - [by Veteran Disability Status](#)
 - [by Veteran Significant Barrier to Employment \(SBE\)](#)
 - [by Veteran Transitional Service Member](#)
 - [by Military Spouse/Dependent Status](#)
 - [by Veteran Campaign Status](#)
 - [by Veteran Eligible Person](#)
 - [by Veteran Status](#)
- ▶ **Registered Individual**
Report data from information entered into the system by individuals during registration.
- ▶ **Résumé**
Reports detailing information on the résumés created by individuals in the system.
- ▶ **Provider Reports**
Reports displaying information about provider institutions, their programs, and contacts.
- ▶ **Services Reports**
View reports providing data on staff-provided services to either individuals or employers.
- ▶ **Staff Efficiency & Tracking Reports**

http://www.indianacareerconnect.com/vosnet/Reports/ReportMenu.aspx?ml=2&rid=&nav=3&grp=8&cat=&subcat=

Indiana Career Connect - Reports

indianacareerconnect.com/vosnet/Reports/ReportMenu.aspx?ml=2&rid=8&nav=3&grp=8&cat=8&subcat=

workoneworks.com

Menu Home Accessibility My Dashboard Sign Out Services for Individuals Services for Employers Quick Search

[Repeat Customer](#)

- ▼ Veteran
 - [by Discharge Status](#)
 - [by Potential Eligibility for Veteran Benefits](#)
 - [by Veteran Disability Status](#)
 - [by Veteran Significant Barrier to Employment \(SBE\)](#)
 - [by Veteran Transitional Service Member](#)
 - [by Military Spouse/Dependent Status](#)
 - [by Veteran Campaign Status](#)
 - [by Veteran Eligible Person](#)
 - [by Veteran Status](#)
- ▼ Registered Individual

Report data from information entered into the system by individuals during registration.

 - ▼ Characteristics
 - [Participant Profile](#)
 - ▼ Registered
 - [by Age](#)
 - [by Cookie Location](#)
 - [by Disability Status](#)
 - [by Employment Status](#)
 - [by Hispanic Ethnicity](#)
 - [by Migrant Farmer Worker Types](#)
 - [by No Virtual Recruiter](#)
 - [by ONET Occupation Group](#)
 - [by Race](#)
 - [by Registration Source](#)
 - [by Unemployment Status](#)
 - [by Website Access Location](#)
 - [by Zip Code](#)
 - [by Attending School Status](#)
 - [by County/Parish](#)
 - [by Education Achievement](#)
 - [by Gender](#)
 - [by IP Location](#)
 - [by Military Spouse/Dependent Status](#)
 - [by Office](#)
 - [by Preferred Language](#)
 - [by Region/LWDB](#)
 - [by UI Update Date](#)
 - [by Ward/Borough/Township](#)
 - [by Works in Agricultural ONET Occupation List](#)
 - ▼ Veteran
 - [by Disabled Veteran Status](#)
 - [by Transitioning Service Members](#)
 - [by Veteran Eligible Person](#)
 - [by Potential Eligibility for Veteran Benefits](#)
 - [by Veteran Discharge Status](#)
 - [by Veteran Status](#)
- Résumé

Reports detailing information on the résumés created by individuals in the system.
- Provider Reports

Reports displaying information about provider institutions, their programs, and contacts.
- Services Reports

View reports providing data on staff-provided services to either individuals or employers.
- Staff Efficiency & Tracking Reports

Track services associated with events, system measures, messaging, and survey results.
- Custom Reports

Create, edit and share custom reports with your team, department or even other states. Select this option to view reports developed for specific states.
- ▼ Federal Reports

Indiana Career Connect - Reports
indianacareerconnect.com/vosnet/Reports/ReportMenu.aspx?ml=2&rid=8&nav=3&grp=8&cat=8&subcat=
workoneworks.com

Home
Accessibility
My Dashboard
Sign Out
Services for Individuals
Services for Employers
Quick Search

Provider Reports
Reports displaying information about provider institutions, their programs, and contacts.

Services Reports
View reports providing data on staff-provided services to either individuals or employers.

Services Provided Employer
View reports displaying information on the services provided by staff to employers.

Services Provided Individual
View reports displaying information, by program, on the services provided by staff to individuals.

Staff Efficiency & Tracking Reports
Track services associated with events, system measures, messaging, and survey results.

Custom Reports
Create, edit and share custom reports with your team, department or even other states. Select this option to view reports developed for specific states.

Federal Reports
Federally mandated reports for EEO, WIOA performance measures, and more.

Eligible Training Providers
Reports on provider institution programs and contacts for WIOA-eligible training providers and all providers.

Equal Employment Opportunities
Display Federal Equal Employment Opportunities Reports.

[Service Types - Adult and Dislocated Worker](#)

[Wagner Peyser - Age and Disability Status](#)

[WIOA Youth Program - Detailed](#)

[WP Participant Services by Race, Ethnicity and Gender](#)

[Program Participations - Adult and Dislocated Worker](#)

[Wagner Peyser - Ethnicity and Race](#)

[WIOA Youth Program - Summary](#)

Foreign Labor Certification
Display Foreign Labor Certification Reports

Veteran Priority of Service

WIA Performance Legacy
Display WIA Performance Legacy Reports.

WIOA Performance
WIOA performance reports, including performance summary reports, performance measures for WIOA participants, and PIRL reporting and data analytics tools.

Live Data
Live updating data visualizations for Registrations, Job Orders, Resumes UI Certifications and Claims. Automatic refresh settings and full screen display options make these reports perfect for large displays.

We value your input, did you find what you were looking for?
Submit

About
Sign Out
Home
Site Map

Settings
Accessibility Statement
Preferred Settings
Page Preferences

Services
For Individuals
For Employers
Labor Market

Mobile App

Legal
Privacy Statement
Terms of Use
Disclaimer
EEO

Resources
Protect Yourself
Feedback
Assistance

Indiana Career Connect
Contact Us

250

An official website of the United States government [Here's how you know](#)

Census Bureau

× 🔍 Advanced Search

[All](#)
[Tables](#)
[Maps](#)
[Pages](#)

[Microdata](#)
[Help](#)
[FAQ](#)
[Feedback](#)

Filters

Results

1 Filter

S2301

Clear search

Find a Filter

Search

Codes

Geography

Surveys

Topics

Years

1 Result

View: 10 | 25 | 50

Download Table Data

American Community Survey

S2301 | EMPLOYMENT STATUS

View All 21 Products

American Community Survey

S2301 | EMPLOYMENT STATUS

2020: ACS 5-Year Estimates Subject Tables

Notes

Geos

Years

Topics

Surveys

Codes

Hide

Transpose

Margin of Error

Restore

Excel

CSV

ZIP

More Tools

		United States	
		Total	Label
Label		Estimate	Margin of Error
Population 16 years and over		261,649,873	±16,002
AGE			
16 to 19 years		16,992,661	±16,829
20 to 24 years		21,820,378	±8,525
25 to 29 years		23,262,155	±6,733
30 to 34 years		22,223,010	±6,502
35 to 44 years		41,346,677	±9,849
45 to 54 years		41,540,736	±8,672
55 to 59 years		21,785,721	±24,028
60 to 64 years		20,315,718	±24,652
65 to 74 years		30,547,950	±4,981
75 years and over		21,814,867	±3,739
RACE AND HISPANIC OR LATINO ORIGIN			
White alone		188,451,879	±68,558
Black or African American alone		32,216,289	±20,399
American Indian and Alaska Native alone		2,063,520	±9,997
Asian alone		15,130,729	±12,651
Native Hawaiian and Other Pacific Islander alone		474,409	±3,572
Some other race alone		12,522,020	±67,022
Two or more races		10,791,027	±38,002
Hispanic or Latino origin (of any race)		42,883,077	±8,075
White alone, not Hispanic or Latino		164,077,952	±24,494
Population 20 to 64 years		192,294,395	±10,081
SEX			



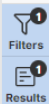
C18120



Advanced Search

All **Tables** Maps Pages

Microdata Help FAQ Feedback



1 Filter ?

C18120

Clear search

Find a Filter

Search

Codes >

Geography >

Surveys >

Topics >

Years >

1 Result

View: 10 | 25 | 50

[Download Table Data](#)

American Community Survey

C18120 | EMPLOYMENT STATUS BY DISABILITY STATUS

[View All 19 Products](#)

American Community Survey

C18120 | EMPLOYMENT STATUS BY DISABILITY STATUS

2020: ACS 5-Year Estimates Detailed Tables | Universe: Civilian noninstitutionalized population 18 to 64 years

Notes Geos Years Topics Surveys Codes Hide Transpose **Margin of Error** Restore Excel CSV ZIP More Tools

United States		
Label	Estimate	Margin of Error
▼ Total:	197,289,696	±9,407
▼ In the labor force:	153,022,839	±119,739
▼ Employed:	144,877,904	±135,796
With a disability	7,703,360	±22,515
No disability	137,174,544	±134,506
▼ Unemployed:	8,144,935	±32,277
With a disability	1,036,876	±9,820
No disability	7,108,059	±30,858
▼ Not in labor force:	44,266,857	±120,445
With a disability	11,490,981	±49,482
No disability	32,775,876	±83,010

Columns
Cell/Column Notes

LOCAL EQUAL OPPORTUNITY AND NONDISCRIMINATION MONITORING TOOL

Region:

Contact/Name:

Address:

Phone:

Date:

REFERENCES

- **Section 188 of the Workforce Innovation and Opportunity Act**
<https://www.dol.gov/crc/188rule/>
- **Ensuring Equal Access to the Nation's Workforce Development System *Final Rule to promote nondiscrimination and equal opportunity in WIOA Title I—financially assisted programs and activities FACT SHEET*** (WIOA Section 188 Nondiscrimination and Equal Opportunity, 29 CFR Part 38) <https://www.dol.gov/crc/188rule/fact-sheet.htm>

Monitoring Review Instrument

Action: Please type in your answers. Be as detailed as possible in your response. If you have any questions or need technical assistance in Elements 1 through 9, please state as such.

Element 1: Designation of Equal Opportunity (EO) Officers

Reference: 29 CFR Part §38.28; §38.29-.33 and DWD Policy 2016-09

1. Name of Local EO Officer:
2. To whom does the Local EO Officer report?
3. For the Local EO Officer, describe any non-EO related job functions that may create a conflict of interest or the appearance of a conflict of interest.
4. On what internal and external communications concerning the region's nondiscrimination and equal opportunity programs does the Local EO Officer's identity and contact information appear?

5.	Does the Local EO Officer:	Y	N
	Process complaints?		
	Review participant reports for equity of service?		
	Conduct on-site visits to service providers and contractors or review monitoring reports to ensure that the region and its contractors are not violating their nondiscrimination obligations?		
	Provide EO training to staff and contractors?		
	Review written policies to make sure they are nondiscriminatory?		
	Develop and publish discrimination complaint procedures?		

6. What equal opportunity training has been provided to staff within the region? (Please specify dates and locations)
7. What training has been provided to service providers and contractors? (Please be specific)
8. What professional training has the Local EO Officer attended? Identify the training received and dates:

9. Describe staffing support for the Local EO Officer, if any. For example, is any staff trained to receive a discrimination complaint as well as complete the complaint information form and customer service record log?

Element 2: Notice and Communication

Reference: 29 CFR §38.34 – §38.39; DWD Policy 2016-09

10. Where are the WIOA “Equal Opportunity is the Law” posters displayed? Are they posted in reasonable numbers and places and located in plain sight?

10a. which versions are displayed?

☐ English

☐ Spanish

☐ Other (please list language(s):

11. How is it ensured that participants are notified of their rights to file a complaint? Does the form include the required WIOA “Equal Opportunity is the Law” language?

11a. where paper files are maintained, is the notice included in the participant's file? Yes____ No____

11b. during each presentation to orient new participants, new employees, and/or the general public to its WIOA Title I-financially assisted program or activity, how does the region include a discussion of rights under the nondiscrimination and equal opportunity provisions of WIOA, including the right to file a complaint of discrimination with the region or the Director of the U.S. DOL CRC? For example, is this done in WorkOne orientation sessions?

12. What steps are taken to see that continuing notice is provided in the appropriate language when a significant number or proportion of the population eligible to be served, or likely to be directly affected, need services or information in a language other than English?

13. Is the tagline: *This WIOA Title I-financially assisted program is an “equal opportunity employer/program,” and that “auxiliary aids and services are available upon request to individuals with disabilities”* included in all of the region's publications, brochures, flyers, announcements, websites, and broadcast and print mass media?

14. How has the region communicated the requirement not to discriminate on the basis of disability and the obligation to provide reasonable accommodations to its sub recipients?
15. What efforts does the region make to ensure that communications with individuals with disabilities are just as effective as communications with others?
16. In all communications indicating that the recipient/Agency may be contacted by telephone, is the telephone number for the TDD/TTY or relay service provided?
17. How is the Equal Opportunity Notice provided in alternate formats for individuals with visual impairments?

Element 3: Assurances

Reference: 29 CFR §38.25 – 38.27; DWD Policy 2016-09

18. Does the region include a written equal opportunity/nondiscrimination assurance in each grant, agreement, contract or other WIOA Title I-financial assistance application? Yes____ No____

Element 4: Affirmative Outreach

Reference: §38.40; DWD Policy 2016-09

19. Describe local outreach efforts to provide universal access to persons of various racial/ethnic groups, persons with disabilities, minority groups and persons of different age groups to broaden the applicant pool.
20. Does the region review Labor Market, Census or other statistical data to develop outreach strategies to job seekers and employers? Yes_____ No_____
21. What reasonable steps has the region taken to ensure services and other information is provided to Limited English Proficient persons?
22. In what languages is information within the region provided, other than English?
23. What documents have been determined "vital" and translated into languages designated as essential?

Element 5: Compliance with Section 504

Reference: §38.72 – 38.73; DWD Policy 2016-09

24. Have WorkOne offices within the region been assessed to ensure they are physically accessible to persons with disabilities? Yes_____ No_____
- 24a. List the offices that have been surveyed within the last two program years and the date the surveys took place.
25. Have contractor facilities within the region been assessed to ensure it is physically accessible to persons with disabilities? Yes_____ No_____

26. For necessary modifications or corrections, have corrective measures been put in place to ensure the changes will be made? Yes_____ No_____

Please see attached table for corrective measures. (ADA Surveys)

27. Are contractor and service provider sites accessible to individuals with disabilities? Yes_____ No_____

27a. is there at least one entrance to the buildings that are wheel chair accessible? If no, explain.

- If yes, does it have the international symbol for accessibility for individuals with disabilities posted? If no, explain.

27b. Do inaccessible entrances have signs indicating the location of the nearest accessible entrance? Explain.

27c. are there designated restrooms with appropriate signage available for individuals with disabilities? Explain.

27d. Are TTY/TDD or Relay Services available for use? Explain.

27e. how often are contractor's facilities monitored to ensure accessibility?

28. Does the region have any programs or resources designed specifically to assist persons with disabilities? Yes_____ No_____

29. Describe efforts to prohibit discrimination on the basis of disability in employment practices by the region and its partners.

- Requiring the provision of reasonable accommodations in employment, when appropriate

- Reviewing job qualifications to ensure that it does not use selection criteria that screen out or tend to screen out an individual with a disability on the basis of that disability unless the criteria is job related for the position in question and consistent with business necessity.
- Prohibiting pre-employment inquiries regarding disability except to ask for the individual to self-identify himself or herself as a person with a disability on a voluntary basis for reporting purposes and will be maintained confidentially.

30. How does the region insure that programs and activities are administered in the most integrated settings possible?

31. How does the region insure that an individual with a disability is not required to accept an accommodation, aid, benefit, service, training, or opportunity that the individual chooses not to accept?

32. Please describe the availability of assistive equipment for individuals with disabilities.

33. Please describe the region's web site in regards to its ADA accessibility.

34. Please describe any reasonable accommodations that have been provided for applicants, participants, or employees with disabilities.

35. How are reasonable accommodations provided regarding the registration for, and the provision of, aid, benefits, services or training--including core and intensive training--and support services to qualified individuals with disabilities?

36. Does the region have a written reasonable accommodation policy? Yes_____ No_____

37. Describe how medical condition information is maintained separate from other files and secured.

Element 6: Data and Information Collection and Maintenance

Reference: §38.41 – 38.45; DWD Policy 2016-09

38. How is staff made aware that data must be collected on race, sex, age, disability, etc.?
39. Does the Local EO officer maintain a discrimination complaint log/file? Yes_____ No_____

Element 7: Monitor Recipients for Compliance

Reference: §38.51 – 38.53; DWD Policy 2016-09

40. Does the region monitor service providers for compliance with WIOA equal opportunity and nondiscrimination regulations? Yes_____ No_____
41. Describe the EO and general monitoring process.
42. List the Local EO Officer monitoring visits conducted for WorkOne Comprehensive, Affiliates and service providers within the last two program years.
- .
43. How often is on-site monitoring conducted?

Element 8: Complaint Processing Procedures

Reference: §38.60 – 38.73; DWD Policy 2016-09

44. What discrimination complaint policies and procedures are used in the region?
45. Explain how customers and employees obtain a copy of the discrimination complaint policy and procedures and/or discrimination complaint form?

46.

Does the discrimination complaint log for complaints include:	Y	N
Name and address		
Basis of complaint		
Brief description of complaint		
Date filed		
Disposition		

47. Please list any formal complaints that have been filed with the last two program years.

48.

Please respond to the following concerning each complaint:	Y	N
Was the complaint filed within 180 days?		
Was the complainant provided a written notification of receipt of the complaint?		
Was the complainant provided a written statement of each of the issues raised in the complaint and whether you would accept or reject each issue?		
Was the complainant sent a written notice of lack of jurisdiction when the region determined that it did not have jurisdiction over a complaint?		
Was the complainant notified that they have the right to representation in the complaint process?		
Was the complainant offered Alternative Dispute Resolution as an effort to resolve the complaint?		
Was the complainant provided a written Notice of Final Action within 90 days of the date the complaint was filed?		
Did the Notice of Final Action contain your decision on each issue and an explanation of the reason underlying the decision?		
Did the Notice of Final Action inform the complainant that he/she has a right to file a complaint with CRC within 30 days of the date in which the Notice of Final Action is issued if he/she is dissatisfied with your final action on the complaint?		
Has the State EO Officer been advised of the complaint?		

49. How is an individual protected from discharge, intimidation, retaliation, threat or coercion when s/he:
- Filed a complaint;
 - Opposed a practice prohibited by the nondiscrimination and equal opportunity provisions of WIOA; or
 - Assisted or participated in any manner in an investigation?
50. Describe the region's policy for handling discrimination complaints from contractors regarding participants.

Element 9: Corrective Actions/Sanctions

Reference: §38.72 – 38.73; DWD Policy 2016-09

51. Describe the region's procedures for obtaining voluntary compliance when equal opportunity violations are found.
52. What is the follow up policy for violations?
53. Describe any corrective actions/sanctions taken against contractors within the last two program years.

Indiana Department of Workforce Development - DWD Compliance and Policy Division (Compliance Team)
Equal Opportunity Pre-Monitoring Survey
PY2022-23

LWDA:	
Local EO Officer:	Date:
Email:	Phone:

Directions & Interview Preparation

- Review the **“Benchmarks”** and mark the box “☒” for each benchmark your LWDA has achieved successfully.
- Add additional information as applicable within the **“Additional Comments”** section.
- Submit the completed survey via email to oversight@dwd.IN.gov by the due date.
- The State EO Officer will schedule the specific review time with the Local EO Officer during the week of the monitoring visit to review this survey and discuss your LWDA’s overall EO compliance.

This survey is used as a pre-monitoring review tool and is NOT all-inclusive or limiting. For questions or concerns while completing the survey, please contact the State EO Officer at EO@dwd.in.gov.

Local Equal Opportunity Officer: 38.28 - 38.31**Is the Local EO Officer ready to provide support?****Benchmarks:**

<input type="checkbox"/>	Recipient has designated a Local EO Officer
<input type="checkbox"/>	Local EO Officer's name, title/position, address, and telephone number have been made public at the local level (including on web-site); contact info appears on internal and external communications regarding nondiscrimination programs
<input type="checkbox"/>	Local EO Officer is a senior level employee of the recipient
<input type="checkbox"/>	Local EO Officer does not have other responsibilities that create a conflict or the appearance of a conflict with the responsibilities of an EO Officer
<input type="checkbox"/>	Local EO Officer has sufficient staff and resources to carry out the EO requirements
<input type="checkbox"/>	Local EO Officer has a solid knowledge of the EO Regulations (29 CFR Part 38)
<input type="checkbox"/>	Local EO Officer undergoes mandatory training to maintain competency with WIOA Section 188 and its EO Regulations

Comments:**Does the Local EO Officer understand their roles and responsibilities?****Benchmarks:**

<input type="checkbox"/>	The Local EO Officer reviews the recipient's written policies to make sure that those policies are nondiscriminatory
<input type="checkbox"/>	The Local EO Officer monitors and investigates the recipients and entities that receive WIOA Title I funds to ensure compliance
<input type="checkbox"/>	The Local EO Officer tracks discrimination complaints filed against the recipient
<input type="checkbox"/>	The Local EO Officer provides local area staff with EO training

Comments:**Notice and Communication: 38.34 - 38.40****What action has the recipient taken to follow notice and communication requirements in 38.34?****Benchmarks:**

<input type="checkbox"/>	"EO is the Law" poster is posted prominently, in reasonable numbers and conspicuous places, on recipient's Web site pages, and in employee and participant handbooks
<input type="checkbox"/>	The EO tagline is printed in recruitment brochures and other materials that are distributed or communicated with participants and staff that describe requirements for participation
<input type="checkbox"/>	All orientation sessions for new employees, new participants, and/or the general public include a discussion of rights and responsibilities of the nondiscrimination and equal opportunity provisions of WIOA and the EO Regulations
<input type="checkbox"/>	Babel Notices written in multiple languages are included with vital documents
<input type="checkbox"/>	Auxiliary aids or services are available in alternate formats (to ensure communication with individuals with disabilities or LEP individuals is as effective as communications with others)

Comments:

Assurance: 38.25

Does the grantee provide a “Written Assurance” that complies with the recipient’s obligation of WIOA Section 188?

Benchmarks:

<input type="checkbox"/>	Recipient is aware of its obligations and has the ability to comply with the nondiscrimination and equal opportunity provisions for the duration of the grant contract
<input type="checkbox"/>	Recipient maintains a policy that describes how EO Regulations will be carried out
<input type="checkbox"/>	The required assurance language of 29 CFR Part 38.25, or a reference to it, is provided on all grant applications, agreements, and contracts
<input type="checkbox"/>	Local staff have reviewed and are aware of the current DWD EO policies and regional policies

Comments:

Affirmative Outreach: 38.40

Has the recipient taken appropriate steps to ensure that they are providing equal access to their WIOA Title I-financially assisted programs and activities?

Benchmarks:

<input type="checkbox"/>	The recipient conducts affirmative outreach to certain target groups
<input type="checkbox"/>	The recipient advertises its programs and/or activities that specifically target various populations in the media, such as newspapers or radio programs
<input type="checkbox"/>	The recipient sends appropriate notices about openings in its programs and/or activities to schools or community service groups that serve various populations
<input type="checkbox"/>	The recipient consults with appropriate community service groups about ways to improve its outreach and service to various populations

Comments:

Accessibility: 38.13

Is the recipient meeting its physical and programmatic accessibility obligations for individuals with disabilities?

Benchmarks:

<input type="checkbox"/>	Individuals with disabilities have adequate parking spaces
<input type="checkbox"/>	Individuals with disabilities have appropriate wheelchair accessibility (doors, space allowances, ramps, access routes)
<input type="checkbox"/>	Individuals with disabilities have appropriate restroom accommodations
<input type="checkbox"/>	Individuals with disabilities are afforded the opportunity to participate in services or training that is equal to or as effective as provided to non-disabled participants
<input type="checkbox"/>	Individuals with disabilities have been provided adequate working assistive technology, as needed
<input type="checkbox"/>	Staff has been trained on use of the assistive technology to properly assist participants
<input type="checkbox"/>	Meaningful accommodations are provided regarding registration for the provision of aid, benefits, services or training, including core and intensive training and support services, to individuals with disabilities

Comments:

Data and Information Collection/Maintenance: 38.41

Does the region collect and maintain data and other information securely to ensure compliance with the nondiscrimination and equal opportunity provisions of WIOA?

Benchmarks:

<input type="checkbox"/>	Regional staff tracks applicants, registrants, eligible applicants, eligible registrants, participants, exited participants, employees, and applicants for employment
<input type="checkbox"/>	Regional staff tracks race/ethnicity, sex, age, and where known, disability status, of every applicant, registrant, participant, exited participant, applicant for employment, and employee
<input type="checkbox"/>	Regional staff tracks limited English proficiency and preferred language of each applicant, registrant, participant, and exited participants
<input type="checkbox"/>	Beneficiaries/participants files are free of subjective and/or inappropriate remarks and comments such as on medical and disability information
<input type="checkbox"/>	All medical or disability-related information, whether in hard copy, electronic, or both, is maintained in a SEPARATE file and treated as confidential
<input type="checkbox"/>	Beneficiaries/participants sign the state's program application/enrollment form (i.e., client application for ICC); acknowledgment of EO notice
<input type="checkbox"/>	Beneficiaries/participants files are retained for at least three (3) years after close of the applicable program year
<input type="checkbox"/>	Such information above is used only for the purposes of recordkeeping, reporting, and determining eligibility where appropriate
<input type="checkbox"/>	The recipient ensures that eligibility criteria that can screen out or tend to screen out an individual with a disability is not being utilized unless such criteria can be shown as necessary

Comments:

Monitoring Recipients for Compliance: 29 CFR 38.51 and 38.53

Does the region conduct local monitoring to ensure compliance with the nondiscrimination and equal opportunity provisions of WIOA?

Benchmarks:

<input type="checkbox"/>	The recipient conducts annual reviews
<input type="checkbox"/>	The recipient conducts data analysis
<input type="checkbox"/>	The recipient investigates any significant different identified from the data analysis to see if the differences appear to be caused by discrimination

Comments:

Complaint Records: 38.69 – 38.72**Has Recipient addressed and logged complaints in accordance with EO Regulations?****Benchmarks:**



<input type="checkbox"/>	The recipient has published procedures for processing complaints in accordance with 29 CFR Part 38
<input type="checkbox"/>	The Local EO Officer maintains a log of complaints for the entire region
<input type="checkbox"/>	The Local EO Officer submits a copy of the log for their region to DWD every quarter
<input type="checkbox"/>	Complaints of discrimination are retained for a period of no less than three (3) years after resolution
<input type="checkbox"/>	Each Notice of Final Action was issued within 90 days of the date the complaint was filed

Comments:**Are there any areas of concern or findings from last monitoring visit you wish to discuss?**


Additional Comments:

Revised August 2020

Final PY2022 DWD Monitoring Schedule	
Week	Region
26-Sep-2022	1
17-Oct-2022	10
14-Nov-2022	11
5-Dec-2022	8
9-Jan-2023	5
30-Jan-2023	12
20-Feb-2023	4
13-Mar-2023	7
10-Apr-2023	6
1-May-2023	9
22-May-2023	3
12-Jun-2023	2

IN DWD Compliance and Policy Division (Compliance Team) Office Review Checklist - EO PY2022					
<div>  <div> <div>REGION:</div> <div>OFFICE:</div> <div>DATES OF REVIEW:</div> <div>REVIEWER:</div> </div> </div>					
<div> <div>INSTRUCTIONS:</div> <div>Office Review Checklist</div> </div>					
	Reviewer 1 Notes	Reviewer 2 Notes	Best Practices/Noteworthy Actions/Areas of Concern/Findings/Recommendations	Requirements	Authorities
<div>a. Signage</div> <div>  </div> <div>at primary entrance</div>				<div>international symbol for accessibility must be used at each primary entrance of an accessible facility</div>	<div>29 CFR 38.15 Communications with individuals with disabilities</div> <div>(c) Information and signage.</div> <div>(2)</div> <div>(i) The international symbol for accessibility must be used at each primary entrance of an accessible facility.</div>
<div>EO is the Law Notices in English and Spanish near the front desk, in training/computer labs</div>					<div>29 CFR 38.36 Recipients' obligations to publish equal opportunity notice.</div> <div>(a) At a minimum, the Equal Opportunity Notice required by §§ 38.34 and 38.35 must be:</div> <div>(1) Posted prominently, in reasonable numbers and places, in available and conspicuous physical locations and on the recipient's Web site pages;</div>
<div>Babel Notice near the front desk and accessible for case managers</div>					<div>29 CFR 38.9(g)(3)</div> <div>(g) With regard to vital information:</div> <div>(3) Recipients must include a "babel notice," indicating in appropriate languages that language assistance is available, in all communications of vital information, such as hard copy letters or decisions or those communications posted on Web sites.</div>
b. Physical Accessibility					
<div> <div>Activate any assistive technology in the WorkOne office to make sure in operable condition.</div> <div>Are there staff members trained to assist clients using this equipment?</div> <div>Are instructions for using the equipment easily accessible?</div> <div>How often is the equipment utilized?</div> </div>					<div>29 CFR 38.13 Accessibility requirements.</div> <div>(a) Physical accessibility. No qualified individual with a disability may be excluded from participation in, or be denied the benefits of a recipient's service, program, or activity or be subjected to discrimination by any recipient because a recipient's facilities are inaccessible or unusable by individuals with disabilities. Recipients that are subject to Title II of the ADA must also ensure that new facilities or alterations of facilities that began construction after January 26, 1992, comply with the applicable federal accessible design standards, such as the ADA Standards for Accessible Design (1991 or 2010) or the Uniform Federal Accessibility Standards. In addition, recipients that receive federal financial assistance must meet their accessibility obligations under Section 504 of the Rehabilitation Act and the implementing regulations at 29 CFR part 32. Some recipients may be subject to additional accessibility requirements under other statutory authority, including Title III of the ADA, that is not enforced by CRC. As indicated in § 38.3(d)(10), compliance with this part does not affect a recipient's obligation to comply with the applicable ADA Standards for Accessible Design.</div> <div>(b) Programmatic accessibility. All WIOA Title I financially assisted programs and activities must be programmatic accessible, which includes providing reasonable accommodations for individuals with disabilities, making reasonable modifications to policies, practices, and procedures, administering programs in the most integrated setting appropriate, communicating with persons with disabilities as effectively as with others, and providing appropriate auxiliary aids or services, including assistive technology devices and services, where necessary to afford individuals with disabilities an equal opportunity to participate in, and enjoy the benefits of, the program or activity.</div>
<div>If there is no assistive technology station, check for raised tables for wheelchairs or other physically accommodating equipment.</div>					<div>see above</div>
c. Publications and other communications					
<div>Check any publications, advertisements, information sheets, etc. for the EO tagline</div>					<div>29 CFR 38.38 Publications, broadcasts, and other communications.</div> <div>(a) Recipients must indicate that the WIOA Title I financially assisted program or activity in question is an "equal opportunity employer/program," and that "auxiliary aids and services are available upon request to individuals with disabilities," in recruitment brochures and other materials that are ordinarily distributed or communicated in written and/or oral form, electronically and/or on paper, to staff, clients, or the public at large, to describe programs financially assisted under Title I of WIOA or the requirements for participation by recipients and participants. Where such materials indicate that the recipient may be reached by voice telephone, the materials must also prominently provide the telephone number of the text telephone (TTY) or equally effective telecommunications system, such as a relay service, videophone, or captioned telephone used by the recipient, as required by § 38.15(b).</div>

Year	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Q1	10.5	11.2	12.0	12.8	13.5	14.2	15.0	15.8	16.5	17.2	18.0
Q2	11.0	11.8	12.5	13.2	14.0	14.8	15.5	16.2	17.0	17.8	18.5
Q3	11.5	12.2	13.0	13.8	14.5	15.2	16.0	16.8	17.5	18.2	19.0
Q4	12.0	12.8	13.5	14.2	15.0	15.8	16.5	17.2	18.0	18.8	19.5
Q5	12.5	13.2	14.0	14.8	15.5	16.2	17.0	17.8	18.5	19.2	20.0
Q6	13.0	13.8	14.5	15.2	16.0	16.8	17.5	18.2	19.0	19.8	20.5
Q7	13.5	14.2	15.0	15.8	16.5	17.2	18.0	18.8	19.5	20.2	21.0
Q8	14.0	14.8	15.5	16.2	17.0	17.8	18.5	19.2	20.0	20.8	21.5
Q9	14.5	15.2	16.0	16.8	17.5	18.2	19.0	19.8	20.5	21.2	22.0
Q10	15.0	15.8	16.5	17.2	18.0	18.8	19.5	20.2	21.0	21.8	22.5
Q11	15.5	16.2	17.0	17.8	18.5	19.2	20.0	20.8	21.5	22.2	23.0
Q12	16.0	16.8	17.5	18.2	19.0	19.8	20.5	21.2	22.0	22.8	23.5
Q13	16.5	17.2	18.0	18.8	19.5	20.2	21.0	21.8	22.5	23.2	24.0
Q14	17.0	17.8	18.5	19.2	20.0	20.8	21.5	22.2	23.0	23.8	24.5
Q15	17.5	18.2	19.0	19.8	20.5	21.2	22.0	22.8	23.5	24.2	25.0
Q16	18.0	18.8	19.5	20.2	21.0	21.8	22.5	23.2	24.0	24.8	25.5
Q17	18.5	19.2	20.0	20.8	21.5	22.2	23.0	23.8	24.5	25.2	26.0
Q18	19.0	19.8	20.5	21.2	22.0	22.8	23.5	24.2	25.0	25.8	26.5
Q19	19.5	20.2	21.0	21.8	22.5	23.2	24.0	24.8	25.5	26.2	27.0
Q20	20.0	20.8	21.5	22.2	23.0	23.8	24.5	25.2	26.0	26.8	27.5
Q21	20.5	21.2	22.0	22.8	23.5	24.2	25.0	25.8	26.5	27.2	28.0
Q22	21.0	21.8	22.5	23.2	24.0	24.8	25.5	26.2	27.0	27.8	28.5
Q23	21.5	22.2	23.0	23.8	24.5	25.2	26.0	26.8	27.5	28.2	29.0
Q24	22.0	22.8	23.5	24.2	25.0	25.8	26.5	27.2	28.0	28.8	29.5
Q25	22.5	23.2	24.0	24.8	25.5	26.2	27.0	27.8	28.5	29.2	30.0
Q26	23.0	23.8	24.5	25.2	26.0	26.8	27.5	28.2	29.0	29.8	30.5
Q27	23.5	24.2	25.0	25.8	26.5	27.2	28.0	28.8	29.5	30.2	31.0
Q28	24.0	24.8	25.5	26.2	27.0	27.8	28.5	29.2	30.0	30.8	31.5
Q29	24.5	25.2	26.0	26.8	27.5	28.2	29.0	29.8	30.5	31.2	32.0
Q30	25.0	25.8	26.5	27.2	28.0	28.8	29.5	30.2	31.0	31.8	32.5
Q31	25.5	26.2	27.0	27.8	28.5	29.2	30.0	30.8	31.5	32.2	33.0
Q32	26.0	26.8	27.5	28.2	29.0	29.8	30.5	31.2	32.0	32.8	33.5

 IN DWD Compliance and Policy Division (Compliance Team) Website Review Checklist - EO PY2022		
REGION:		
DATE OF REVIEW:		
REVIEWER:		
Purpose: The purpose of the Website tool is to facilitate the review of all applicable items in accordance with the website as it relates to services being delivered.		
INSTRUCTIONS: Review the region's website for all pertinent information. Indicate whether the website has met the criteria listed below.		
WEBSITE ADDRESS:		
Item	Notes	Authorities
EO Notice is posted prominently in English and Spanish		29 CFR 38.36, DWD Policy 2016-09
EO tagline is posted prominently		29 CFR 38.38, DWD Policy 2016-09
WEBSITE ADDRESS:		
Item	Notes	Authorities
EO Notice is posted prominently in English and Spanish		29 CFR 38.36, DWD Policy 2016-09
EO tagline is posted prominently		29 CFR 38.38, DWD Policy 2016-09
SOCIAL MEDIA ADDRESS:		
Item	Notes	Authorities
EO tagline is posted prominently		29 CFR 38.38, DWD Policy 2016-09
SOCIAL MEDIA ADDRESS:		
Item	Notes	Authorities
EO tagline is posted prominently		29 CFR 38.38, DWD Policy 2016-09
SOCIAL MEDIA ADDRESS:		
Item	Notes	Authorities
EO tagline is posted prominently		29 CFR 38.38, DWD Policy 2016-09
SOCIAL MEDIA ADDRESS:		
Item	Notes	Authorities
EO tagline is posted prominently		29 CFR 38.38, DWD Policy 2016-09

PY19 EO ANALYSIS - Region 11

WIOA Adult

Client Group	Total Clients	Individualized Career Services	Training Services	ICS Rate	Adverse Impact	TS Rate	Adverse Impact
All Gender	784	666	118	84.95%		15.05%	
Male	415	359	56	86.51%	Best	13.49%	80.31%
Female	369	307	62	83.20%	96.18%	16.80%	Best
All Race	767	650	117	84.75%		15.25%	
Hispanic/Latino	11	7	4	N/A	N/A	N/A	N/A
American Indian	3	3	0	N/A	N/A	N/A	N/A
Asian	5	4	1	N/A	N/A	N/A	N/A
Black or African /	103	86	17	83.50%	97.79%	16.50%	Best
Native Hawaiian	2	1	1	N/A	NA	N/A	N/A
White	643	549	94	85.38%	Best	14.62%	88.60%
More Than One f	3	3	0	N/A	NA	N/A	NA
All Disability	784	666	118	84.95%		15.05%	
Disabled	49	38	11	77.55%	90.76%	22.45%	Best
Not Disabled	735	628	107	85.44%	Best	14.56%	64.85%

PY19 EO ANALYSIS - Region 11

WIOA DW

Client Group	Total Clients	Individualized		ICS Rate	Adverse Impact	TS Rate	Adverse Impact
		Career Services	Training Services				
All Gender	411	379	32	92.21%		7.79%	
Male	200	186	14	93.00%	Best	7.00%	82.06%
Female	211	193	18	91.47%	98.35%	8.53%	Best
All Race	393	361	32	91.86%		8.14%	
Hispanic/Latino	3	2	1	N/A	N/A	N/A	N/A
American Indian or Alaskan Native	3	3	0	N/A	N/A	N/A	N/A
Asian	1	1	0	N/A	N/A	N/A	N/A
Black or African American	36	33	3	91.67%	99.64%	8.33%	Best
Native Hawaiian or Other Pacific Islander	0	0	0	N/A	N/A	N/A	N/A
White	350	322	28	92.00%	Best	8.00%	96.00%
More Than One Race	0	0	0	N/A	N/A	N/A	N/A
All Disability	411	379	32	92.21%		7.79%	
Disabled	13	12	1	N/A	N/A	N/A	N/A
Not Disabled	398	367	31	92.21%	Best	7.79%	Best

PY19 EO ANALYSIS - Region 11

WIOA Youth

Client Group	Total Clients	Individualized Career Services	Training Services	ICS Rate	Adverse Impact	TS Rate	Adverse Impact
All Gender	305	280	25	91.80%		8.20%	
Male	142	129	13	90.85%	98.06%	9.15%	Best
Female	163	151	12	92.64%	Best	7.36%	80.42%
All Race	337	311	26	92.28%		7.72%	
Hispanic/Latino	30	29	1	96.67%	Best	3.33%	40.90%
American Indian or Alaskan Native	2	1	1	N/A	N/A	N/A	N/A
Asian	1	1	0	N/A	N/A	N/A	N/A
Black or African American	68	63	5	92.65%	95.84%	7.35%	90.22%
Native Hawaiian or Other Pacific Islander	3	3	0	N/A	N/A	N/A	N/A
White	233	214	19	91.85%	95.01%	8.15%	Best
More Than One Race	12	11	1	N/A	N/A	N/A	N/A
All Disability	305	280	25	91.80%		8.20%	
Disabled	54	51	3	94.44%	Best	5.56%	63.38%
Not Disabled	251	229	22	91.24%	96.60%	8.76%	Best

Population Served Analysis - By Race

Favored Group	Category	
White	Population Demographic	155089
White	Population Served	129
White	Not Enrolled	154960
Unfavored Group		
Black or African A	Population Demographic	1798
Black or African A	Population Served	8
Black or African A	Not Enrolled	1790

Calculate 1 Standard Error

P = Overall Rate getting Enrolled	0.0009
1 - P	0.9991
nF = Number of Favored Group	155089
1 / n _F	0.00000645
nNF = Number of Non Favored Group	1798
1 / n _{NF}	0.00055617
1 Standard Error	
<small>a technical term that I always used to call the standard deviation</small>	0.0701%

Calculate Difference in Rates of Getting to Point B

Rate for Favored	0.08%
Rate for Unfavored	0.44%
difference	-0.36%

Calculate Number of Standard Deviations	-5.16
--	--------------

Notes about Standard Deviations

1. The standard deviation analysis looks at the probability that the difference in rates is due to chance.

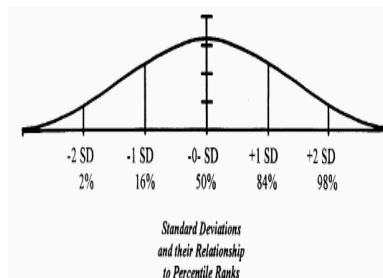
2. Technically, this is a two independent sample binomial test

3. Differences **greater than 2.0 standard deviations** is generally what suggests possible discrimination

4. The 2.0 standard deviation represents a less than 5.0% chance that the difference in rates is due to chance.

5. Another way to think about it is that if the SD is greater than 2.0, there is something that is controlling the process because there is less than 5% chance that the difference was caused by chance.

Analysis Summary	
Region	9
Counties	Bartholomew, Dearborn, Decatur, Franklin,
Data Source	US Census Fact Finder - Employment Status 2019 ACS 5 year estimates (S2301) - 5 year estimates; & ICC Enrolled Individuals - Race WIOA PY20 by Participation Date (Age 16+)
Purpose of Report	Compare population demographic of a favored group and unfavored group to the population served by favored and unfavored group by race to determine if there is any indication of discrimination.
Summary of Report	



$$\sqrt{p \times (1 - p) \times \left\{ \frac{1}{n_F} + \frac{1}{n_{NF}} \right\}}$$

Population Served Analysis - By Race

Favored Group	Category	
White	Population Demographic	155089
White	Population Served	129
White	Not Enrolled	154960
Unfavored Group		
Other	Population Demographic	2406
Other	Population Served	4
Other	Not Enrolled	2402

Calculate 1 Standard Error

P = Overall Rate getting Enrolled	0.0008
1 - P	0.9992
nF = Number of Favored Group	155089
1 / n _F	0.00000645
nNF = Number of Non Favored Group	2406
1 / n _{NF}	0.00041563
1 Standard Error	
<small>a technical term that I always used to call the standard deviation</small>	0.0597%

Calculate Difference in Rates of Getting to Point B

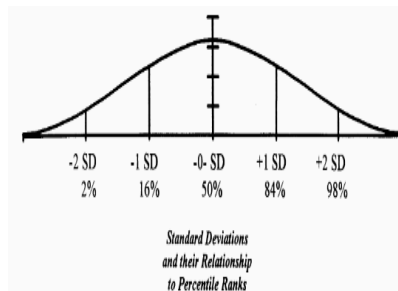
Rate for Favored	0.08%
Rate for Unfavored	0.17%
difference	-0.08%

Calculate Number of Standard Deviations	-1.39
--	--------------

Notes about Standard Deviations

1. The standard deviation analysis looks at the probability that the difference in rates is due to chance.
2. Technically, this is a two independent sample binomial test
3. Differences **greater than 2.0 standard deviations** is generally what suggests possible discrimination
4. The 2.0 standard deviation represents a less than 5.0% chance that the difference in rates is due to chance.
5. Another way to think about it is that if the SD is greater than 2.0, there is something that is controlling the process because there is less than 5% chance that the difference was caused by chance.

Analysis Summary	
Region	9
Counties	Bartholomew, Dearborn, Decatur, Franklin,
Data Source	US Census Fact Finder - Employment Status 2019 ACS 5 year estimates (S2301) - 5 year estimates; & ICC Enrolled Individuals - Race WIOA PY20 by Participation Date (Age 16+)
Purpose of Report	Compare population demographic of a favored group and unfavored group to the population served by favored and unfavored group by race to determine if there is any indication of discrimination.
Summary of Report	



$$\sqrt{p \times (1 - p) \times \left\{ \frac{1}{n_F} + \frac{1}{n_{NF}} \right\}}$$

Population Served Analysis - By Race

Favored Group	Category	
White	Population Demographic	155089
White	Population Served	129
White	Not Enrolled	154960
Unfavored Group		
Asian	Population Demographic	5109
Asian	Population Served	0
Asian	Not Enrolled	5109

Calculate 1 Standard Error

P = Overall Rate getting Enrolled	0.0008
1 - P	0.9992
nF = Number of Favored Group	155089
1 / n _F	0.00000645
nNF = Number of Non Favored Group	5109
1 / n _{NF}	0.00019573
1 Standard Error	
<small>a technical term that I always used to call the standard deviation</small>	0.0403%

Calculate Difference in Rates of Getting to Point B

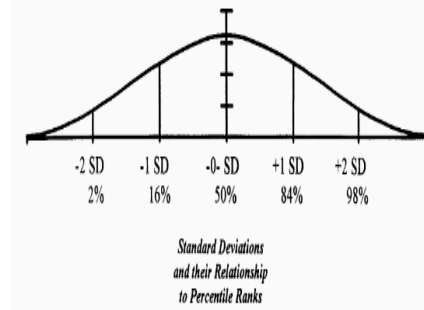
Rate for Favored	0.08%
Rate for Unfavored	0.00%
difference	0.08%

Calculate Number of Standard Deviations	2.06
--	-------------

Notes about Standard Deviations

1. The standard deviation analysis looks at the probability that the difference in rates is due to chance.
2. Technically, this is a two independent sample binomial test
3. Differences **greater than 2.0 standard deviations** is generally what suggests possible discrimination
4. The 2.0 standard deviation represents a less than 5.0% chance that the difference in rates is due to chance.
5. Another way to think about it is that if the SD is greater than 2.0, there is something that is controlling the process because there is less than 5% chance that the difference was caused by chance.

Analysis Summary	
Region	9
Counties	Bartholomew, Dearborn, Decatur, Franklin, Jackson
Data Source	US Census Fact Finder - Employment Status 2019 ACS 5 year estimates (S2301) - 5 year estimates; & ICC Enrolled Individuals - Race WIOA PY20 by Participation Date (Age 16+)
Purpose of Report	Compare population demographic of a favored group and unfavored group to the population served by favored and unfavored group by race to determine if there is any indication of discrimination.
Summary of Report	



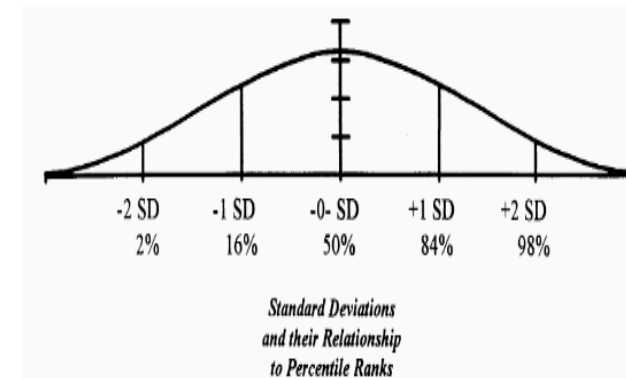
$$\sqrt{p \times (1 - p) \times \left\{ \frac{1}{n_F} + \frac{1}{n_{NF}} \right\}}$$

	A	B	C	D	E	F	G	H	I	J					
1	Population Served Analysis - By Ethnicity														
2	Favored Group	Category			Analysis Summary										
3	White, not Hispan	Population Demographic	152341		Region	9									
4	White, not Hispan	Population Served	102		Counties	Bartholomew, Dearborn, Decatur, Franklin, Jackson									
5	White, not Hispan	Not Enrolled	152239		Data Source	US Census Fact Finder - Employment Status 2019 ACS 5 year estimates (S2301) - 5 year estimates; & ICC Enrolled Individuals - Ethnicity WIOA PY20 by Participation Date (Age 16+)									
6					Purpose of Report	Compare population demographic of a favored group and unfavored group to the population served by favored and unfavored group by race to determine if there is any indication of discrimination.									
7	Unfavored Group				Summary of Report										
8	Hispanic or Latino	Population Demographic	5347												
9	Hispanic or Latino	Population Served	6												
10	Hispanic or Latino	Not Enrolled	5341												
11															
12		Calculate 1 Standard Error													
13		P = Overall Rate getting Enrolled	0.0007												
14		1 - P	0.9993												
15		nF = Number of Favored Group	152341												
16		1 / n _F	0.00000656												
17		nNF = Number of Non Favored Group	5347												
18		1 / n _{NF}	0.00018702												
19		1 Standard Error	0.0364%												
20		<i>a technical term that I always used to call the standard deviation</i>													
21		Calculate Difference in Rates of Getting to Point B													
22		Rate for Favored	0.07%												
23		Rate for Unfavored	0.11%												
24		difference	-0.05%												
25															
26		Calculate Number of Standard Deviations	-1.24												
27															
28		Notes about Standard Deviations													
29		1. The standard deviation analysis looks at the probability that the difference in rates is due to chance.													
30		2. Technically, this is a two independent sample binomial test													
31		3. Differences greater than 2.0 standard deviations is generally what suggests possible discrimination													
32		4. The 2.0 standard deviation represents a less than 5.0% chance that the difference in rates is due to chance.													
33		5. Another way to think about it is that if the SD is greater than 2.0, there is something that is controlling the process because there is less than 5% chance that the difference was caused by chance.													

Region	9
Counties	Bartholomew, Dearborn, Decatur, Franklin, Jackson
Data Source	US Census Fact Finder - Employment Status 2019 ACS 5 year estimates (S2301) - 5 year estimates; & ICC Enrolled Individuals - Ethnicity WIOA PY20 by Participation Date (Age 16+)
Purpose of Report	Compare population demographic of a favored group and unfavored group to the population served by favored and unfavored group by race to determine if there is any indication of discrimination.
Summary of Report	

Standard Deviations
and their Relationship
to Percentile Ranks

$$\sqrt{p \times (1 - p) \times \left\{ \frac{1}{n_F} + \frac{1}{n_{NF}} \right\}}$$

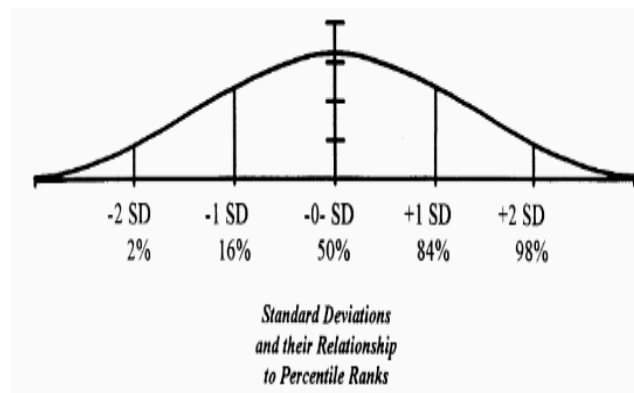


$$\sqrt{p \times (1 - p) \times \left\{ \frac{1}{n_F} + \frac{1}{n_{NF}} \right\}}$$

	A	B	C	D	E	F	G	H	I	J												
1	Population Served Analysis - By Age																					
2	Favored Group	Category			<table><tr><th colspan="2">Analysis Summary</th></tr><tr><td>Region</td><td>9</td></tr><tr><td>Counties</td><td>Bartholomew, Dearborn, Decatur, Franklin, Jackson</td></tr><tr><td>Data Source</td><td>US Census Fact Finder - Employment Status 2019 ACS 5 year estimates (S2301) - 5 year estimates; & ICC Enrolled Individuals - Age WIOA PY20 by Participation Date (Age 16+).</td></tr><tr><td>Purpose of Report</td><td>Compare population demographic of a favored group and unfavored group to the population served by favored and unfavored group by age to determine if there is any indication of discrimination.</td></tr><tr><td>Summary of Report</td><td></td></tr></table>						Analysis Summary		Region	9	Counties	Bartholomew, Dearborn, Decatur, Franklin, Jackson	Data Source	US Census Fact Finder - Employment Status 2019 ACS 5 year estimates (S2301) - 5 year estimates; & ICC Enrolled Individuals - Age WIOA PY20 by Participation Date (Age 16+).	Purpose of Report	Compare population demographic of a favored group and unfavored group to the population served by favored and unfavored group by age to determine if there is any indication of discrimination.	Summary of Report	
Analysis Summary																						
Region	9																					
Counties	Bartholomew, Dearborn, Decatur, Franklin, Jackson																					
Data Source	US Census Fact Finder - Employment Status 2019 ACS 5 year estimates (S2301) - 5 year estimates; & ICC Enrolled Individuals - Age WIOA PY20 by Participation Date (Age 16+).																					
Purpose of Report	Compare population demographic of a favored group and unfavored group to the population served by favored and unfavored group by age to determine if there is any indication of discrimination.																					
Summary of Report																						
3	16-54	Population Demographic	126843																			
4	16-54	Population Served	131																			
5	16-54	Not Enrolled	126712																			
6																						
7	Unfavored Group																					
8	55+	Population Demographic	39739																			
9	55+	Population Served	11																			
10	55+	Not Enrolled	39728																			
11																						
12	Calculate 1 Standard Error																					
13	P = Overall Rate getting Enrolled		0.0009																			
14	1 - P		0.9991																			
15	nF = Number of Favored Group		126843																			
16	1 / n _F		0.00000788																			
17	nNF = Number of Non Favored Group		39739																			
18	1 / n _{NF}		0.00002516																			
19	1 Standard Error																					
20	<i>a technical term that I always used to call the standard deviation</i>		0.0168%																			
21																						
22	Calculate Difference in Rates of Getting to Point B																					
23	Rate for Favored		0.10%																			
24	Rate for Unfavored		0.03%																			
25	difference		0.08%																			
26	Calculate Number of Standard Deviations			4.51																		
27																						
28	Notes about Standard Deviations																					
29	1. The standard deviation analysis looks at the probability that the difference in rates is due to chance.																					
30	2. Technically, this is a two independent sample binomial test																					
31	3. Differences greater than 2.0 standard deviations is generally what suggests possible discrimination																					
32	4. The 2.0 standard deviation represents a less than 5.0% chance that the difference in rates is due to chance.																					
33	5. Another way to think about it is that if the SD is greater than 2.0, there is something that is controlling the process because there is less than 5% chance that the difference was caused by chance																					

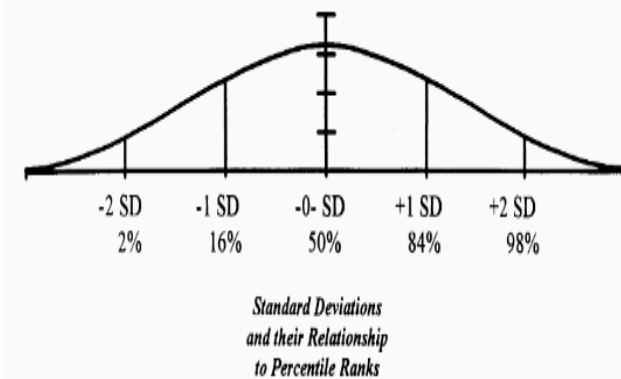
Standard Deviations and their Relationship to Percentile Ranks

$$\sqrt{p \times (1 - p) \times \left\{ \frac{1}{n_F} + \frac{1}{n_{NF}} \right\}}$$



$$\sqrt{p \times (1 - p) \times \left\{ \frac{1}{n_F} + \frac{1}{n_{NF}} \right\}}$$

	A	B	C	D	E	F	G	H	I	J												
1	Population Served Analysis - By Disability																					
2	Favored Group	Category			<table><tr><th colspan="2">Analysis Summary</th></tr><tr><td>Region</td><td>9</td></tr><tr><td>Counties</td><td>Bartholomew, Dearborn, Decatur, Franklin, Jackson, Jefferson, Jenn</td></tr><tr><td>Data Source</td><td>US Census Fact Finder - Employment Status by Disability Status 2019 ACS 5 year estimates (C18120) - 5 year estimates; & ICC Enrolled Individuals - Disability Status WIOA PY20 by Participation Date</td></tr><tr><td>Purpose of Report</td><td>Compare population demographic of a favored group and unfavored group to the population served by favored and unfavored group by disability to determine if there is any indication of discrimination.</td></tr><tr><td>Summary of Report</td><td></td></tr></table>						Analysis Summary		Region	9	Counties	Bartholomew, Dearborn, Decatur, Franklin, Jackson, Jefferson, Jenn	Data Source	US Census Fact Finder - Employment Status by Disability Status 2019 ACS 5 year estimates (C18120) - 5 year estimates; & ICC Enrolled Individuals - Disability Status WIOA PY20 by Participation Date	Purpose of Report	Compare population demographic of a favored group and unfavored group to the population served by favored and unfavored group by disability to determine if there is any indication of discrimination.	Summary of Report	
Analysis Summary																						
Region	9																					
Counties	Bartholomew, Dearborn, Decatur, Franklin, Jackson, Jefferson, Jenn																					
Data Source	US Census Fact Finder - Employment Status by Disability Status 2019 ACS 5 year estimates (C18120) - 5 year estimates; & ICC Enrolled Individuals - Disability Status WIOA PY20 by Participation Date																					
Purpose of Report	Compare population demographic of a favored group and unfavored group to the population served by favored and unfavored group by disability to determine if there is any indication of discrimination.																					
Summary of Report																						
3	No	Population Demographic	144043																			
4	No	Population Served	125																			
5	No	Not Enrolled	143918																			
6																						
7	Unfavored Group																					
8	Yes	Population Demographic	9677																			
9	Yes	Population Served	12																			
10	Yes	Not Enrolled	9665																			
11																						
12	Calculate 1 Standard Error																					
13	P = Overall Rate getting Enrolled		0.0009																			
14	1 - P		0.9991																			
15	nF = Number of Favored Group		144043																			
16	1 / n _F		0.00000694																			
17	nNF = Number of Non Favored Group		9677																			
18	1 / n _{NF}		0.00010334																			
19	1 Standard Error																					
20	<i>a technical term that I always used to call the standard deviation</i>		0.0313%																			
21																						
22	Calculate Difference in Rates of Getting to Point B																					
23	Rate for Favored		0.09%																			
24	Rate for Unfavored		0.12%																			
25	difference		-0.04%																			
26	Calculate Number of Standard Deviations		-1.19																			
27																						
28	Notes about Standard Deviations																					
29	1. The standard deviation analysis looks at the probability that the difference in rates is due to chance.																					
30	2. Technically, this is a two independent sample binomial test																					
31	3. Differences greater than 2.0 standard deviations is generally what suggests possible discrimination																					
32	4. The 2.0 standard deviation represents a less than 5.0% chance that the difference in rates is due to chance.																					
33	5. Another way to think about it is that if the SD is greater than 2.0, there is something that is controlling the process because there is less than 5% chance that the difference was caused by chance																					



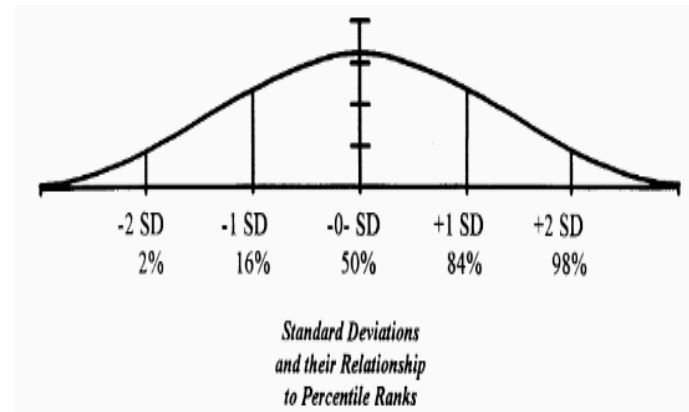
$$\sqrt{p \times (1 - p) \times \left\{ \frac{1}{n_F} + \frac{1}{n_{NF}} \right\}}$$

$$\sqrt{p \times (1 - p) \times \left\{ \frac{1}{n_F} + \frac{1}{n_{NF}} \right\}}$$

	A	B	C	D	E	F	G	H	I	J												
1	Population Served Analysis - By Gender																					
2	Favored Group	Category			<table><tr><th colspan="2">Analysis Summary</th></tr><tr><td>Region</td><td>9</td></tr><tr><td>Counties</td><td>Bartholomew, Dearborn, Decatur, Franklin, Jackso</td></tr><tr><td>Data Source</td><td>US Census Fact Finder - Employment Status 2019 ACS 5 year estimates (S2301) - 5 year estimates; & ICC Enrolled Individuals - Gender WIOA PY20 by Participation Date (Age 20-64)</td></tr><tr><td>Purpose of Report</td><td>Compare population demographic of a favored group and unfavored group to the population served by favored and unfavored group by gender to determine if there is any indication of discrimination.</td></tr><tr><td>Summary of Report</td><td></td></tr></table>						Analysis Summary		Region	9	Counties	Bartholomew, Dearborn, Decatur, Franklin, Jackso	Data Source	US Census Fact Finder - Employment Status 2019 ACS 5 year estimates (S2301) - 5 year estimates; & ICC Enrolled Individuals - Gender WIOA PY20 by Participation Date (Age 20-64)	Purpose of Report	Compare population demographic of a favored group and unfavored group to the population served by favored and unfavored group by gender to determine if there is any indication of discrimination.	Summary of Report	
Analysis Summary																						
Region	9																					
Counties	Bartholomew, Dearborn, Decatur, Franklin, Jackso																					
Data Source	US Census Fact Finder - Employment Status 2019 ACS 5 year estimates (S2301) - 5 year estimates; & ICC Enrolled Individuals - Gender WIOA PY20 by Participation Date (Age 20-64)																					
Purpose of Report	Compare population demographic of a favored group and unfavored group to the population served by favored and unfavored group by gender to determine if there is any indication of discrimination.																					
Summary of Report																						
3	Male 20-64	Population Demographic	80876																			
4	Male 20-64	Population Served	68																			
5	Male 20-64	Not Enrolled	80808																			
6																						
7	Unfavored Group																					
8	Female 20-64	Population Demographic	68307																			
9	Female 20-64	Population Served	73																			
10	Female 20-64	Not Enrolled	68234																			
11																						
12		Calculate 1 Standard Error																				
13		P = Overall Rate getting Enrolled	0.0009																			
14		1 - P	0.9991																			
15		nF = Number of Favored Group	80876																			
16		1 / n _F	0.00001236																			
17		nNF = Number of Non Favored Group	68307																			
18		1 / n _{NF}	0.00001464																			
19		1 Standard Error																				
20		<i>a technical term that I always used to call the standard deviation</i>	0.0160%																			
21		Calculate Difference in Rates of Getting to Point B																				
22		Rate for Favored	0.08%																			
23		Rate for Unfavored	0.11%																			
24			difference	-0.02%																		
25																						
26		Calculate Number of Standard Deviations		-1.43																		
27																						
28		Notes about Standard Deviations																				
29		1. The standard deviation analysis looks at the probability that the difference in rates is due to chance.																				
30		2. Technically, this is a two independent sample binomial test																				
31		3. Differences greater than 2.0 standard deviations is generally what suggests possible discrimination																				
32		4. The 2.0 standard deviation represents a less than 5.0% chance that the difference in rates is due to chance.																				
33		5. Another way to think about it is that if the SD is greater than 2.0, there is something that is controlling the process because there is less than 5% chance that the difference was caused by chance.																				

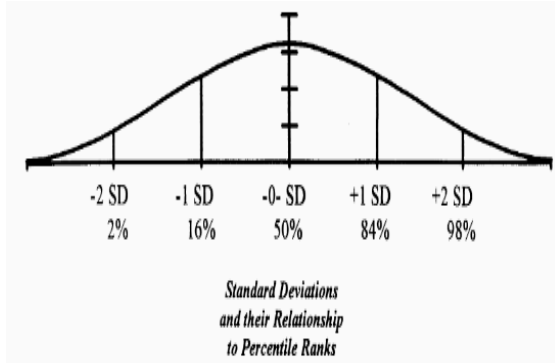
Standard Deviations
and their Relationship
to Percentile Ranks

$$\sqrt{p \times (1 - p) \times \left\{ \frac{1}{n_F} + \frac{1}{n_{NF}} \right\}}$$



$$\sqrt{p \times (1 - p) \times \left\{ \frac{1}{n_F} + \frac{1}{n_{NF}} \right\}}$$

	A	B	C	D	E	F	G	H	I	J												
1	Population Served Analysis - By LEP																					
2	Favored Group	Category		<table><tr><th colspan="2">Analysis Summary</th></tr><tr><td>Region</td><td>9</td></tr><tr><td>Counties</td><td>Bartholomew</td></tr><tr><td>Data Source</td><td>US Census Factfinder - NATIVITY BY LANGUAGE OF BORN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER 2019 ACS 5 year estimates (B16005) - 5 year estimates; & ICC Enrolled Individuals WIOA PY20 by Participation Date Filter English Language</td></tr><tr><td>Purpose of Report</td><td>To determine if there is any indication of discrimination with serving LEP participants.</td></tr><tr><td>Summary of Report</td><td></td></tr></table>							Analysis Summary		Region	9	Counties	Bartholomew	Data Source	US Census Factfinder - NATIVITY BY LANGUAGE OF BORN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER 2019 ACS 5 year estimates (B16005) - 5 year estimates; & ICC Enrolled Individuals WIOA PY20 by Participation Date Filter English Language	Purpose of Report	To determine if there is any indication of discrimination with serving LEP participants.	Summary of Report	
Analysis Summary																						
Region	9																					
Counties	Bartholomew																					
Data Source	US Census Factfinder - NATIVITY BY LANGUAGE OF BORN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER 2019 ACS 5 year estimates (B16005) - 5 year estimates; & ICC Enrolled Individuals WIOA PY20 by Participation Date Filter English Language																					
Purpose of Report	To determine if there is any indication of discrimination with serving LEP participants.																					
Summary of Report																						
3	Non LEP	Population Demographic	307251																			
4	Non LEP	Population Served	142																			
5	Non LEP	Not Enrolled	307109																			
6																						
7	Unfavored Group																					
8	LEP	Population Demographic	2624																			
9	LEP	Population Served	0																			
10	LEP	Not Enrolled	2624																			
11																						
12	Calculate 1 Standard Error																					
13	P = Overall Rate getting Enrolled		0.0005																			
14	1 - P		0.9995																			
15	nF = Number of Favored Group		307251																			
16	1 / n _F		0.00000325																			
17	nNF = Number of Non Favored Group		2624																			
18	1 / n _{NF}		0.00038110																			
19	1 Standard Error <i>a technical term that I always used to call the standard deviation</i>		0.0420%																			
20																						
21	Calculate Difference in Rates of Getting to Point B																					
22	Rate for Favored		0.05%																			
23	Rate for Unfavored		0.00%																			
24	difference		0.05%																			
25																						
26	Calculate Number of Standard Deviations		1.10																			
27																						
28	Notes about Standard Deviations																					
29	1. The standard deviation analysis looks at the probability that the difference in rates is due to chance.																					
30	2. Technically, this is a two independent sample binomial test																					
31	3. Differences greater than 2.0 standard deviations is generally what suggests possible discrimination																					
32	4. The 2.0 standard deviation represents a less than 5.0% chance that the difference in rates is due to chance.																					
33	5. Another way to think about it is that if the SD is greater than 2.0, there is something that is controlling the process because there is less than 5% chance that the difference was caused by chance.																					



Standard Deviations
and their Relationship
to Percentile Ranks

$$\sqrt{p \times (1 - p) \times \left\{ \frac{1}{n_F} + \frac{1}{n_{NF}} \right\}}$$

Analysis Summary			
Region	9		
Counties	Bartholomew, Dearborn, Decatur, Franklin, Jackson, Jefferson, Jennings, Ohio, Ripley, and Switz		
Summary of Standard Deviation Analysis - Population Demographic - Population Served. 2 or greater indicates a probability of discrimination			
Category	Deviation	Probability of Discrimination	Notes
Race #1	-5.16	No	
Race #2	-1.39	No	
Race #3	2.06	Yes	
Ethnicity	-1.24	No	
Age	4.51	Yes	
Disability	-1.19	No	
Gender	-1.43	No	
LEP	1.10	No	



Comprehensive Monitoring Report

Program Year 2021-2022

Local Workforce Development Area 1
 2804 Boilermaker Court, Suite E
 Valparaiso, IN 46383

REVIEW SUMMARY

Review Week:	October 25, 2021 – October 29, 2021
Review Period:	September 2020 – October 2021
Grant Recipient:	The Center of Workforce Innovations, Inc. (CWI)
Staff to the Board:	CWI
Fiscal Agent:	CWI
One Stop Operator:	CWI
Service Provider(s):	CWI (A/DW) Goodwill (OOSY) Jobworks (ISY & OOSY)
Prior Monitoring Findings:	No prior year findings
PY 2020-21 Assessed Risk:	Low Risk
PY2021-22 Assessed Risk:	Low Risk
Programs Reviewed:	WIOA A/DW/Y Dislocated Worker Grant – Disaster Recovery (DWG-DR) Dislocated Worker Grant – Employment Recovery (DWG-ER) Workforce Ready Grant – Rapid Recovery (WRG-RR)

Local Workforce Development Area (LWDA or Local Area) American Job Center (AJC) WorkOne Locations Visited:

Comprehensive Sites

Hammond | Lake County
 Portage | Porter County

Affiliate Sites

Gary | Lake County
 Michigan City | LaPorte County
 LaPorte | LaPorte County

Together, the Indiana Department of Workforce Development (DWD) Compliance and Policy Division (Compliance Team) and LWDA 1, determined that due to the need for COVID-19 safety precautions, this year's review would take place remotely. On October 25, 2021, the DWD Compliance Team began the LWDA 1 review with an entrance conference via Microsoft Teams. Subsequent interviews with program, fiscal, and Equal Opportunity (EO) staff took place via Microsoft Teams and conference calls throughout the week. In addition, the Compliance Team conducted virtual tours of the WorkOne offices listed above. At the end of the monitoring week the Compliance Team had an exit conference call where it presented a summary of the week's activities, including a non-exhaustive list of potential findings, areas of concern, and best practices. Information within this report summarizes the Compliance Team's overall evaluation of the LWDA relative to the Review Areas described herein.

SCOPE OF REVIEW

The Indiana Department of Workforce Development (DWD) Compliance and Policy Division (Compliance Team) conducts annual monitoring of each LWDA to examine compliance with statutory, regulatory, and policy-driven requirements, and identify areas in need of administrative, financial management, programmatic, and/or systemic improvement. For this

year, DWD’s reviews are focusing on, but not limited to, the Workforce Innovation and Opportunity Act (WIOA) Title I and the Dislocated Worker Grants (DWGs) that have been awarded to each region.

The Compliance Team begins its monitoring of each Local Area by gathering LWDA-specific feedback from DWD Program Directors and Subject Matter Experts, reviewing previously requested policy and procedure and other documents submitted by the LWDA, and conducting a risk assessment using DWD’s Risk Assessment Tool. The Risk Assessment Tool is completed using the above information and generates a risk score (i.e., low, medium, high) that informs the monitoring review. Information reviewed is categorized into the following three review areas: Administrative & Financial Management; Workforce Development Programs; and Equal Opportunity & Nondiscrimination.

The attached appendix includes definitions of report terminology, grant performance information, fiscal performance information, and compliance team staff who contributed to this report.

ANALYSIS

Administrative/Financial Management

The Compliance Team’s review included analyzing: contracts and agreements; prior monitoring and audit findings; subrecipient monitoring and audit oversight; property leases; administrative and financial policies and procedures; required local reporting to various DWD programs; internal and budget controls; cash draws, cash management and reconciliations; general ledgers and disbursements; cost classification and allocation; record retention; WDB structure and governance; implementation of the Local Plan; and compliance with other applicable regulations, policies, and guidance.

Compliance Findings:

There were no fiscal or administrative compliance findings identified within the scope of this review.

Areas of Concern:

Area of Concern #1: Agreement Needed for CWI’s Multiple Roles

CWI serves LWDA 1 as board staff, the OSO, service provider, and fiscal agent which provides a unified structure that simplifies WIOA program management and allows for greater control of costs. However, operating with this structure requires internal controls and safeguards to mitigate potential conflicts of interest with the same entity performing multiple functions.

Requirements for Local WDBs providing career and training services and serving as the OSO, also pertain to staff of the Local WDB. (See 20 CFR 679.410(d)). Therefore, in Region’s 1 case, because CWI is staff to the board, OSO, and career service provider, Governor-level approval is needed. DOL has recently indicated that local WDBs operating in multiple roles in the WIOA service delivery system is an area of concern with other DOL Region 5 states. DWD is developing guidance around this requirement and intends to issue more information and technical assistance on this topic in the future.

Workforce Development Programs

The Compliance Team examined a computer-generated, randomly selected sample of 30 participant files. The sample included Adult, Dislocated Workers (DW), In-School Youth (ISY), Out-of-School Youth (OSY), Veterans, Low-Income

Individuals, On-the-Job Training (OJT) participants, WRG-RR participants and participants receiving DWG services. The sample consisted of participants who were active or exited during the current program year. The Compliance Team used desk reviews and interviews to evaluate overall compliance with applicable regulations, policies, and guidance. Compliance Team staff also conducted virtual visits of WorkOne centers within the LWDA and interviewed WorkOne management, case managers, an adult participant, and a WDB member.

Compliance Findings:

There were no programmatic compliance findings identified within the scope of this review.

Areas of Concern:

Area of Concern #2: Contact Type Not Entered into Indiana Career Connect (ICC)

During the participant file review, the Compliance Team determined that case managers frequently do not select a “contact type.” This causes ICC to default to “not applicable” (N/A) and thus, the method of communication between the case manager and participant is unknown. Case managers must ensure that all pertinent facts have been recorded in the participant’s case file. Detailed case notes that include the method of communication between the case manager and participant support the development of comprehensive service plans to help participants meet their employment and education goals. Additionally, should a participant change their case managers, this information may help make the transition be more seamless if the new case manager is aware of how the participant communicated with their previous case manager. The Compliance Team encourages LWDA 1 to instruct staff on the proper completion of case notes which includes “contact type” and to encourage its service providers to add “contact type” to the tool it uses to review participant records.

Noteworthy Efforts:

Noteworthy Action #1: Training Program Promotes More Effective Participant Support

In response to a climate/culture survey seeking opportunities for improvement, Region 1 staff identified a need for more consistent training. To address this concern, CWI developed a formal three-phase training program to provide a broad overview of the CWI organization before drilling down to focus on position-specific needed knowledge and skills. This training program provides staff opportunities to talk with individuals in all CWI departments, 1-on-1 training and mentoring, and the chance to demonstrate new skills learned. The LWDA’s plan is for this training to be available to all new CWI, subrecipient, and DWD staff working in the region.

At the time of the Compliance Team’s review CWI had just completed phase two of this program which involved all new staff being in Valparaiso for a multi-day training. Besides being an excellent example of how CWI is responsive to its staff identified needs, providing comprehensive staff training increases LWDA 1 participants’ ability to receive consistent services, regardless of which office or staff person they work with.

Noteworthy Action #2: Unique Staff Positions to Best Serve Participants

To better serve participants and manage its staffing resources CWI created unique positions to provide more individualized services to participants transitioning out of services, and to better support its Career Advisors. As individuals complete their training and/or career services they are moved from working with their Career Advisors to a Transition Career Advisor. This relatively new position is responsible for maintaining routine contact with individuals to help problem solve and address any issues that may have evolved since services were completed or that have the potential to jeopardize the individual’s current employment. At the same time this allows Career Advisors to be more available to the participants on their active current caseloads. As a result, both current and exited participants in LWDA 1 can receive more thorough, individualized services.

Another relatively new position in LWDA 1 is the Skill Training Manager. This position is responsible for training Career Advisors to ensure proper administration of special grants. The volume of special grants and their varying eligibility requirements can be overwhelming to keep track of in addition to all the other workforce and other programs' requirements. This position eases that burden for staff and helps ensure that participants who can benefit from multiple programs are able to take advantage of these resources.

Equal Opportunity & Nondiscrimination

The Compliance Team's evaluation of the Local Area's progress in implementing and administering EO and Nondiscrimination programs included: conducting case manager interviews and virtual WorkOne site visits as well as reviewing the Local EO Officer designation and performance; local EO policy and procedures; required notices and communications (e.g., posters, Babel notices, taglines, relay services, etc.); orientations; service delivery for individuals with disabilities and individuals with limited English proficient (LEP); physical and programmatic accessibility; complaint processing procedures; affirmative outreach; data and information collection and maintenance; and overall compliance with applicable regulations, policies, guidance, and the LWDA's implementation of Indiana's Nondiscrimination Plan.

Per 29 CFR 38.51(b), WIOA grant recipients are required to conduct an analysis of data and subsequent investigation of significant differences in populations receiving services. The goal is to determine if such differences may be due to discrimination.

As the State EO Officer discussed in the interview with the Local EO Officer, the Compliance Team used a formula developed by the National Association of State Workforce Agencies' (NASWA) EO Subcommittee to compare PY2020 ICC data on the LWDA's WIOA participants' gender, race, ethnicity, age, and limited English proficiency (LEP) with recent U.S. Census data for people in the LWDA's counties.¹ The purpose of this analysis was to identify if the LWDA is serving protected groups in its population to the level expected given the demographics of the communities it serves. The expectation is that the LWDA will investigate if the analysis identifies a large difference between numbers of people accessing WIOA Individualized Career Services (ICS) or Training Services (TS) in the LWDA's WorkOne offices, and numbers in the community.

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

For example, according to the below chart which shows the results of this analysis, the LWDA has a 15.42 SD for the older worker (55+) population. This suggests that the LWDA may not have provided services to older workers in their communities. This was confirmed through review of LWDA 1 ICC and U.S. Census data. With a SD over 2.0, DWD expects the LWDA to investigate to determine why this might be the case. This investigation could include looking at additional data, business processes, and outreach efforts.

¹ Census data provided by the 2019 American Community Survey 5 Year estimates

LWDA 1 EO-Related Data Analysis Summary

Category	Standard Deviation	Need for LWDA Investigation
Race #1 – Black/African American	-28.72	No
Race #2 - Other	2.94	Yes
Race #3 - Asian	1.54	No
Ethnicity	-2.21	No
Age	15.42	Yes
Disability	-4.42	No
Gender	-3.18	No
LEP	4.18	Yes

Lines in bold indicate the following based on Region 1 counties' census data:

1. Black/African Americans are participating in WIOA ICS and TS at a higher rate than expected.
2. "Other" races are participating in WIOA at a lesser rate than expected.
3. Older labor force population (55+) are participating in WIOA at a lesser rate than expected.
4. LEP individuals are participating in WIOA services at a lesser rate than expected.

DWD encourages Local EO Officers to conduct similar reviews to determine how its internal business practices and outreach efforts may be impacting different protected groups and to identify if corrective measures may be necessary. The State EO Officer and DOL reference materials are great resources to learn more about how data analysis can be conducted.

Compliance Findings:

There were no EO or nondiscrimination findings found within the scope of this review.

Areas of Concern:

Area of Concern #3: Lack of EO Training for WorkOne Staff

According to 29 CFR 38.31 and DWD Policy 2016-09, the Local EO Officer is required to provide training to LWDA staff and service providers. However the State EO Officer's discussions with staff indicated a potential lack of training on the various components of EO as they specifically relate to WIOA Section 188 and 29 CFR 38.

The Urban League training that LWDA staff participated in recently was an excellent opportunity to learn about diversity, equity, and inclusion and aligns well with the spirit of the EO regulations; however, it did not provide the operational procedures for how staff fulfill their EO-related day to day activities. Staff were unable to answer questions or discuss EO related topics regarding their offices including the availability of Microsoft accessibility tools on their computers, the Local EO Officer's name, and the purpose of a Babel Notice.

The Compliance Team strongly suggests that the LWDA strengthen its staff training related to the EO regulations and office procedures. Additionally, the Compliance Team suggests that the Local EO Officer attends or presents EO trainings to all staff to increase their presence in the LWDA. The State EO officer is available to provide guidance and technical assistance as needed.

Area of Concern #4: Incorrect EO Complaint Procedure Information in Presentation Slides

According to 29 CFR 38.39, during any presentation that orients new participants, new employees, or the public to WIOA Title I programs or activities, the LWDA “must include a discussion of rights and responsibilities under the nondiscrimination and equal opportunity provisions of WIOA.” This presentation must also include information on the right to file a complaint of discrimination with the LWDA or the US Department of Labor Civil Rights Center.

During the review, the LWDA provided the State EO Officer with a PowerPoint presentation titled “WOW! WorkOne Can Help You!” that the LWDA uses for its virtual workshops. In this presentation on slide 17, general information about filing a complaint was included and directed customers to file a complaint with their “local Human Rights Commission Office.” According to 29 CFR 38.69 and the LWDA’s complaint procedures, this is not the most accurate procedure for filing a complaint. Additionally, the presentation did not include the Local EO Officer’s information.

The Compliance Team suggests that the LWDA revise the identified slide in its PowerPoint presentation to reflect the accurate discrimination complaint procedures including the name and contact information of their Local EO Officer.

Noteworthy Efforts:

Noteworthy Action #3: New Teletypewriter (TTY) Software Available

The LWDA replaced their existing TTY machines with a software-based TTY program called IpTTY. The new software was installed on a designated public computer in the LWDA resource areas and allows customers who are deaf or hard of hearing to make and receive phone calls. As a result, participants with disabilities have the auxiliary communication aide to receive necessary services in their community.

COMPREHENSIVE MONITORING SUMMARY

This report provides an objective analysis of the Local Area’s compliance with federal, state, and local regulations, policies, and guidance for the Review Period of September 2020 – October 2021. The results contained in this Report are believed to be true and accurate based on the files inspected, samples tested, and interviews conducted.



Approved By: _____

Becky Paul, Director of Monitoring & Quality, Division of Compliance & Policy

APPENDIX

Report Terminology

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

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

Noteworthy Efforts. New, unique, significant, or innovative initiatives and results, and/or notable or exemplary practices shall be classified as Noteworthy Efforts.

Standard Deviation. A quantity calculated to indicate the extent of deviation for a group as a whole. It is a way to measure to see how likely an outcome is due to random chance. DWD would expect the breakdown of who LWDA serve to be representative of the breakdown of individuals that live in the LWDA's communities.

Fiscal Performance Information

The below table shows the active grants for the LWDA during the current program year (PY21) along with a 3-year history of WIOA grants for the LWDA.

Grant Name	Program Name	Start Date	End Date	Allocation	\$ Expended as of 8/31/21	% Expended as of 8/31/21
WIOA901	WIOA PY19 - ADULT ADMIN	7/1/2019	12/31/2021	\$346,910.00	\$346,910.00	100.00%
WIOA901	WIOA PY19 - DW ADMIN	7/1/2019	12/31/2021	\$137,162.00	\$137,162.00	100.00%
WIOA901	WIOA PY19 - YT ADMIN	7/1/2019	12/31/2021	\$375,087.00	\$375,087.00	100.00%
WIOA901	WIOA PY19 - ADULT	7/1/2019	12/31/2021	\$3,122,190.00	\$3,122,190.00	100.00%
WIOA901	WIOA PY19 - DISLOC WRKR	7/1/2019	12/31/2021	\$1,234,467.00	\$1,234,467.00	100.00%
WIOA901	WIOA PY19 - YOUTH	7/1/2019	12/31/2021	\$3,375,786.00	\$3,375,786.00	100.00%
WIOA PY19 TOTAL				\$8,591,602.00	\$8,591,602.00	100.00%
WIOA2001	WIOA PY20 - ADULT ADMIN	7/1/2020	6/30/2022	\$401,919.00	\$219,519.00	54.62%
WIOA2001	WIOA PY20 - DW ADMIN	7/1/2020	6/30/2022	\$134,920.00	\$0.00	0.00%
WIOA2001	WIOA PY20 - YT ADMIN	7/1/2020	6/30/2022	\$436,328.00	\$0.00	0.00%
WIOA2001	WIOA PY20 - DISLOC WRKR	7/1/2020	6/30/2022	\$850,000.00	\$0.00	0.00%
WIOA2001	WIOA PY20 - ADULT	7/1/2020	6/30/2022	\$3,617,275.00	\$3,583,372.00	99.06%
WIOA2001	WIOA PY20 - DISLOC WRKR	7/1/2020	6/30/2022	\$364,275.00	\$364,275.00	100.00%
WIOA2001	WIOA PY20 - YOUTH	7/1/2020	6/30/2022	\$3,926,954.00	\$469,661.00	11.96%
WIOA PY20 TOTAL				\$9,731,671.00	\$4,636,827.00	47.65%

WIOA2101	WIOA PY21 - ADULT ADMIN	7/1/2021	6/30/2023	\$81,914.00	\$0.00	0.00%
WIOA2101	WIOA PY21 - DW ADMIN	7/1/2021	6/30/2023	\$30,134.00	\$0.00	0.00%
WIOA2101	WIOA PY21 - YT ADMIN	7/1/2021	6/30/2023	\$507,061.00	\$0.00	0.00%
WIOA2101	WIOA PY21 - ADULT	7/1/2021	6/30/2023	\$737,232.00	\$0.00	0.00%
WIOA2101	WIOA PY21 - DISLOC WRKR	7/1/2021	6/30/2023	\$271,207.00	\$43,085.00	15.89%
WIOA2101	WIOA PY21 - YOUTH	7/1/2021	6/30/2023	\$4,563,551.00	\$0.00	0.00%
WIOA PY21 TOTAL				\$11,334,044.00	\$43,085.00	0.38%
AE2101	Adult Education PY21	7/1/2021	6/30/2022	\$ 1,274,281.00	\$0.00	0.00%
BC2101	Business Consultant PY21	7/1/2021	6/30/2022	\$ 120,000.00	\$117,805.07	98.17%
AE2101	Adult Basic Education & Literacy PY21	7/1/2021	6/30/2022	\$ 66,502.00	\$0.00	0.00%
JAG2101	Jobs for Americas Graduates PY21	7/1/2021	12/31/2022	\$ 355,000.00	\$0.00	0.00%
NLIJETG2101	Next Level Jobs - Employer Training Grant PY21	5/1/2021	6/30/2022	\$ 420,000.00	\$0.00	0.00%
RESEA2101	Re-Employment Services and Eligibility Assessment PY21	1/1/2021	9/30/2022	\$ 599,500.00	\$0.00	0.00%
RRCOVID2101	RAPID RESPONSE	6/1/2021	3/31/2022	100,000.00	\$19,282.00	19.28%
WRGCARES2101	Workforce Ready Grant - Rapid Recovery PY21	3/1/2020	12/31/2021	\$ 201,988.00	\$66,498.05	32.92%

Dislocated Worker Grant Performance Information

	Planned Total for Grant Period	Actual Total as of 9/30/21	Percent of Planned Participants Served as of 9/30/21	Percent of Total Award Expended as of 9/30/21
DWG – DR	20	3	15%	46.6%
DWG – ER	73	11	15%	21.5%

Compliance Team Staff

Compliance Team Contact:

Becky Paul, Director of Monitoring & Quality, BPaul@dwd.in.gov
 General Inquiries, Oversight@dwd.in.gov

Compliance Team Members Contributing to this Review:

Equal Opportunity

Jennifer Long, State EO Officer
Jennifer Greimann, Compliance Specialist

Fiscal & Administration

Larry Upchurch, Senior Fiscal Monitor
Melanie Cervantes Rico, Fiscal Monitor

Program

Kassandra Vaught, Fiscal Monitor

Blayze Damron, Senior Program Monitor

Scott Ooley, Program Monitor

Element 8: Complaint Processing Procedures

[29 CFR 38.69 through 38.85]

DWD published EO complaint processing procedures mirroring those found in 29 CFR Part 38 via the DWD EO Policy.¹⁰⁶ These procedures provide a complainant with the option to file a complaint with the LWDA's Local EO Officer or directly with the CRC Director. Local EO Notices provide filing instructions, the Local EO Officer's name and contact information, as well as CRC contact information.¹⁰⁷ Additionally, DWD published and distributed a technical assistance guide to further provide guidance regarding requirements and best practices for processing discrimination complaints under 29 CFR Part 38.¹⁰⁸

Complaints

Applicants, registrants, eligible applicants/registrants, participants, employees and applicants for employment are notified of their right to the complaint process by way of posters and notices in the WorkOne offices with the prescribed language from 29 CFR Part 38. The "Equal Opportunity is the Law" notice communicates that any person who believes that she/he, or any specific class of individuals, has been or is being subjected to discrimination prohibited by WIOA, may file a written complaint within 180 days of the alleged discrimination.

A complainant may file a complaint by completing and submitting a LWDA developed form or CRC's Complaint Information and Privacy Act Consent Forms, which may be obtained either from the Local/State EO Officer or from CRC. The forms are available on CRC's website at <https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/external/how-to-file-complaint>. Complaints must be filed in writing, either electronically or in hard copy, and must contain the following information:

- Complainant's name, mailing address, and if available, email address (or other means of contact);
- Identity of respondent;
- Description of allegations;
- Written or electronic signature of the complainant or complainant's representative.

Complaint Processing

- Whether a complaint is filed locally with a recipient's Local EO Officer or directly with CRC, established complaint processing procedures must be followed.¹⁰⁹ DWD Policy

¹⁰⁶ DWD Policy 2016-09 (See Documentation 1.5)

¹⁰⁷ Documentation 8.1: Sample Local EO Notice

¹⁰⁸ Documentation 8.2: DWD Technical Assistance 2021-07: Complaint Procedures for WIOA Nondiscrimination and Equal Opportunity Provisions

¹⁰⁹ Documentation 8.3: Excerpt from Local EO Officer NDP Training Element 8 PowerPoint

2016-09 outlines the procedures that must be followed by recipients. Those procedures including technical assistance on Complaint Procedures for WIOA Nondiscrimination and Equal Opportunity Provisions must include, at a minimum, the following elements:

- Initial, written notice to complainant acknowledging receipt of complaint, notice of complainant's right to representation, notice of rights contained in the EO poster, and notice that the complainant has the right to request and receive, at no cost, auxiliary aids and services, language assistance services, and that the notice will be translated as required;
- Written statement of the issue(s), provided to complainant, that includes a list of issues raised in the complaint and whether the recipient will accept or reject each issue;
- Stated period for fact-finding or investigation;
- Stated period for attempt to resolve complaint, including provision for alternative dispute resolution (ADR);
- Written Notice of Final Action (NFA) provided to complainant within 90 days of filing date.

Notice of Final Action

Recipients must issue the NFA to the complainant within 90 days of the date on which the complaint was filed. The NFA informs the complainant of the ruling for the issue(s) raised in the initial complaint and an explanation of each decision, or a description of the way the parties resolved the issue. The NFA also advises the complainant of the right to **file a complaint with the CRC within 30 days of receiving the NFA if dissatisfied with the recipient's decision.**

If, by the end of 90 days from the filing date, the Recipient has failed to issue a NFA, the complainant may file a complaint with the CRC within 30 days of the expiration of the 90-day period (i.e., within 120 days of the filing date).

Alternative Dispute Resolution

At any point after complaint filing, but before issuance of the NFA, the parties may request the use of an ADR process such as mediation.¹¹⁰ Election whether to use ADR is a decision of the complainant. Should an agreement reached under ADR be breached, the non-breaching party may file a complaint directly with CRC within 30 days of the date on which the non-breaching party learns of the alleged breach. If the CRC Director determines that the agreement has been breached, the complaint will be reinstated and processed in accordance with the recipient's procedures.

¹¹⁰ Documentation 8.4: Sample Mediation Agreement Form from ICRC

If the parties are unable to reach an agreement through ADR, **the recipient will continue the investigation or** the complainant may file the complaint directly with CRC as described in 29 CFR 38.69 – 38.72.

Element 8 Documentation

Documentation 8.1: Sample Local EO Notice

Documentation 8.2: DWD Technical Assistance 2021-07: Complaint Procedures for WIOA
Nondiscrimination and Equal Opportunity Provisions

Documentation 8.3: Excerpt from Local EO Officer NDP Training Element 8 PowerPoint

Documentation 8.4: Sample Mediation Agreement Form from ICRC

EQUAL OPPORTUNITY IS THE LAW

It is against the law for this recipient of Federal financial assistance to discriminate on the following bases: against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I—financially assisted program or activity.

The recipient must not discriminate in any of the following areas: deciding who will be admitted, or have access, to any WIOA Title I—financially assisted program or activity; providing opportunities in, or treating any person with regard to, such a program or activity; or making employment decisions in the administration of, or in connection with, such a program or activity.

Recipients of federal financial assistance must take reasonable steps to ensure that communications with individuals with disabilities are as effective as communications with others. This means that, upon request and at no cost to the individual, recipients are required to provide appropriate auxiliary aids and services to qualified individuals with disabilities.

WHAT TO DO IF YOU BELIEVE YOU HAVE EXPERIENCED DISCRIMINATION

If you think that you have been subjected to discrimination under a WIOA Title I—financially assisted program or activity, you may file a complaint within 180 days from the date of the alleged violation with either: the recipient's Equal Opportunity Officer (or the person whom the recipient has designated for this purpose);

Mellisa Leaming, Equal Opportunity Officer; Region 4 Workforce Board; 976 Mezzanine Drive, Suite C; Lafayette, IN 47905 or electronically at mleaming@tap.lafayette.in.us.

or

Director, Civil Rights Center (CRC), U.S. Department of Labor 200 Constitution Avenue NW, Room N-4123, Washington, DC 20210 or electronically as directed on the CRC website at www.dol.gov/crc.

If you file your complaint with the recipient, you must wait either until the recipient issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center (see address above). If the recipient does not give you a written Notice of Final Action within 90 days of the day on which you filed your complaint, you may file a complaint with CRC before receiving that Notice. However, you must file your CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which you filed your complaint with the recipient). If the recipient does give you a written Notice of Final Action on your complaint, but you are dissatisfied with the decision or resolution, you may file a complaint with CRC. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action.



- ☒ Mandatory
☐ Informational
☐ Best Practice
☐ Other

TECHNICAL ASSISTANCE

Date: 01/26/2022
Contact: eo@dwd.in.gov
Program: Workforce Innovation and Opportunity Act (WIOA) Equal Opportunity
Subject: DWD Technical Assistance 2021-07
 Complaint Procedures for WIOA Nondiscrimination and Equal Opportunity Provisions

Purpose

To provide guidance regarding the requirement that recipients¹ develop and publish complaint processing procedures in accordance with the equal opportunity and nondiscrimination provisions within WIOA Section 188 and its implementing regulations at 29 CFR Part 38. This guidance provides minimum requirements and procedural guidance to local workforce development boards (local WDBs or LWDBs), subrecipients of WIOA Title I grant funds, service providers, and WorkOne American Job Centers (AJCs) regarding the development, maintenance, and implementation of local-level discrimination complaint processing procedures. This guidance is primarily intended to assist Local Equal Opportunity Officers (Local EO Officers) in processing locally received complaints.

References

- WIOA Section 188
- 29 CFR Part 38
- DWD Policy 2016-09 *Equal Opportunity and Nondiscrimination Guidance Letter*

Content

All grant recipients/program providers under Title I of WIOA are responsible for complying with the discrimination complaint procedures consistent with 29 CFR Part 38, as outlined in this technical guidance. Any person who believes that he or she, or any specific class of individuals, has been or is being subjected to discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, or related medical conditions, gender identity, and transgender status), national origin (including limited English proficiency), age, disability, political affiliation or belief, and for beneficiaries only, citizenship or participation in WIOA Title I has the right to file a complaint within 180 calendar days of the alleged discrimination. The filing period may be extended for good cause in some limited circumstances. However, only the Director of the CRC may extend the filing time.

¹ See 29 CFR 38.4(zz). A recipient is any entity that receives financial assistance under WIOA Title I, either directly from the US Department of Labor or through the Governor or another recipient. American Job Center Partners are considered recipients to the extent that they participate in the one-stop delivery system.

The WIOA nondiscrimination regulations prohibit discrimination in all aspects of the administration, management, and operation of WIOA programs, services, and activities. DWD has adopted the following procedures for processing complaints alleging violations of the nondiscrimination and equal opportunity provisions of WIOA Title I-funded programs.

Responsibilities of the LWDB/Local Area

Recipients, such as local WDBs, must develop and publish complaint processing procedures for use by their service providers. Procedures must state that a Notice of Final Action (NFA) will be issued within **90 days** of the complaint filing date. At a minimum, the procedures must also include the elements listed below.²

- a. An initial written notice to complainant that:
 - i. Acknowledges receiving the complaint;
 - ii. Provides notice that complainant has right to be represented in the complaint process;
 - iii. Provides notice of rights contained in 29 CFR 38.35; and
 - iv. Provides notice that complainant has right to request and receive, at no cost, auxiliary aids and services, language assistance services, and that this notice will be translated into the non-English languages.³
- b. A written statement of the issue(s) to complainant that includes:
 - i. A list of the issues raised in the complaint; and
 - ii. For each issue, a statement whether recipients will accept issue for investigation or reject, and reasons for each rejection.⁴
- c. Stated period⁵ for fact-finding/investigation of the circumstances of the complaint.
- d. Stated period⁶ that recipient attempts to resolve complaint, including alternative dispute resolution (ADR).⁷
- e. Written NFA provided to complainant within **90 days** of the date on which the complaint was filed. The NFA must include for each issue in the complaint:
 1. Either the decision on the issue and explanation of reason of that decision or description on how issue was resolved; and
 2. Notice that the complainant has the right to file a complaint with the US Department of Labor's Civil Rights Center (CRC) within **30 days** from date the NFA is received if complainant is dissatisfied.⁸
 3. Must provide for ADR, which may be attempted at any time between the filing date of the complaint and the issue of the NFA and only the complainant can decide whether to use ADR or follow customary process. If parties do not reach an agreement under ADR, complainant may file complaint with CRC.⁹

² 29 CFR 38.73.

³ As required in 29 CFR 38.4(h) and (i), 38.34, and 38.36.

⁴ See Attachment B *Example: Initial Written Notice of Receipt*.

⁵ Locally defined. Must meet 90-day requirement.

⁶ Locally defined. Must meet 90-day requirement.

⁷ In ADR, a neutral party is used to resolve issues between complainant and respondent. ADR may be attempted any time between the filing date of the complaint and the issuance of the notice of final action (NFA). Only the complainant can decide whether to use ADR or to follow customary process.

⁸ See Attachment C *Example: Notice of Final Action*.

⁹ As described in 29 CFR 38.69 – 38.71.

Local EO Officers are primarily responsible for complaint processing in their respective local areas and must ensure that procedures are followed. See the *Discrimination Complaint Process* section below for additional information and steps to be followed by Local EO Officers.

Each local area, through their designated Local EO Officer, must track and process all local discrimination complaints per their local complaint processing procedures. The Local EO Officer must inform and keep the State EO Officer updated of all complaints, including forwarding a copy of the filed discrimination complaint to the State EO Officer. Local EO Officers must complete and submit a Quarterly Complaint Log¹⁰ to the State EO Officer via email to the DWD Equal Opportunity inbox (EO@dwd.in.gov) on April 5th, July 5th, October 5th, and January 5th.

Discrimination Complaint Process

Step 1: Filing a Complaint

A complainant or complainant representative files a discrimination complaint with the local area by completing the CRC Discrimination Complaint Form¹¹ or by using a locally developed form¹² or they can file directly with the CRC.¹³ These forms are available from the Local EO Officer, the State EO Officer, or from the CRC. Filing a complaint with the local area does not affect a complainant's right to file with the CRC if complainant is not satisfied with the resolution provided by the local area. Regardless of with whom the complainant files the discrimination complaint, the following information must be provided by complainant:¹⁴

- The complainant's name, mailing address, e-mail address, if available, and telephone number (or another means of contacting the complainant).
- The identity of the respondent (the individual or entity that the complainant alleged is responsible for the discrimination).
- A description of the complainant's allegations. This description must include enough detail to allow the local area, the DWD, or the CRC to decide whether:
 - Local, State, or the CRC, as applicable, has jurisdiction over the complaint;
 - The complaint was timely filed (within **180 days**); and
 - The complaint has merit; in other words, whether the complainant's allegations, if true, would violate any of the nondiscrimination and equal opportunity provisions of Section 188 of the WIOA. Completing and submitting either local, State, or the CRC Complaint Form may provide the information required by this paragraph.
- The complainant's written or electronic signature, or the written or electronic signature of the complainant's authorized representative.

¹⁰ State Form 46001.

¹¹ Please visit: <https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/external/how-to-file-complaint> to obtain the CRC Discrimination Complaint Form.

¹² Any locally developed form must contain all the necessary and relevant complaint information as outlined in the CRC's form and this guidance. Existing forms should be examined to make sure they align with these expectations and are modified if needed.

¹³ Although 29 CFR 38 outlines the federal complaint processing procedures, sometimes complainants elect to file through other means (e.g., the Indiana Civil Rights Commission). If this occurs, the Local EO Officer should immediately notify the State EO Officer of notification from ICRC.

¹⁴ 29 CFR 38.70.

Complainants with disabilities must be provided, upon request and at no cost to them, appropriate accommodations, auxiliary aids, and services to file their complaint. Customers who are limited English proficient (LEP) must be provided, upon request and at no cost to them, language assistance services, including oral interpretation and/or written translation to file their complaint.

Step 2: Jurisdiction

Upon receipt of a discrimination complaint, the Local EO Officer must log the complaint on the Quarterly Complaint Log and, if necessary, confer with the State EO Officer prior to determining jurisdiction over the complaint. If it is determined that another entity has jurisdiction, the Local EO Officer must promptly refer the discrimination complaint to the State EO Officer and notify the complainant in writing and include the reasons for the referral. If it is under the jurisdiction of the local area, the Local EO Officer must issue a letter to the complainant acknowledging receipt of the complaint, outline the issues identified, and include that the complainant has the right to file a complaint with the Director of the CRC within **30 calendar days** of the date on which the complainant received the notice.

If the discrimination complaint contains insufficient information or is missing requirements, the Local EO Officer should attempt to obtain information from the complainant. If complainant fails to provide information, the local area can reject the complaint.

If the complaint is a state level complaint, the State EO Officer will work with the program point of contact to follow the steps for their particular program.

If the discrimination complaint is sent directly to the State EO Officer, and it falls under the jurisdiction of the local level, the State EO Officer will contact the Local EO Officer to address the complaint locally.

Step 3: Notice of Receipt Letter¹⁵

The Local EO Officer must issue an initial written Notice of Receipt letter to complainants that contains the following information:

- Acknowledgement of receipt of the discrimination complaint;
- Notice that the complainant has the right to be represented in the discrimination complaint process;
- Equal Opportunity is the Law notice;
- Notice that the complainant has the right to request and receive, at no cost, auxiliary aids and services, language assistance services, and that the notice will be translated into the appropriate non-English language;¹⁶

The following information needs to be provided in a written statement to the complainant and it is suggested to include them in the Notice of Receipt Letter:

- A list of each issue raised in the discrimination complaint and, for each issue, a statement that the issue is accepted for investigation or is not accepted. The reason(s) must be provided for rejection; and

¹⁵ See Attachment B *Example: Initial Written Notice of Receipt*.

¹⁶ As required in 29 CFR Part 38.34, 29 CFR Part 38.36, and 29 CFR Part 38.9.

- The complainant must be given an invitation to participate in ADR.¹⁷

Step 4: Begin the Investigation

The Local EO Officer must begin an investigation of the discrimination complaint immediately after issuance of the Notice of Receipt.

The total time allowed for processing the discrimination complaint is **90 calendar days** from the date on which the complaint was filed. If by the end of the **90 days** from the filing date, the recipient has failed to issue a Notice of Final Action, the complainant may file a complaint with the CRC Director within 30 days of the expiration of the 90-day period (i.e., within **120 days** of filing date).

If the complainant elects to file with the CRC, the complainant must be informed that the local area has **90 calendar days** to process the discrimination complaint and that CRC will not investigate the complaint until the **90 calendar-day** period has expired.

Step 5: Alternative Dispute Resolution

If the complainant chooses to participate in ADR to mediate the complaint, they or their designee must respond in writing and it must be dated, signed by the complainant, and include the relief sought. Complainants may request ADR at any time after they have filed a written complaint, but before they have received NFA. The choice whether to use ADR or the customary investigative process rests with the complainant. If the complainant chooses ADR, the respondent will be notified, and a mediator will be assigned. Each LWDB should assign a designated mediator. Mediators must be neutral, third-party individuals who can assist the complainant and respondent in communicating concerns and reaching mutual agreement to resolve the dispute. The mediator does not rule as who is right or wrong, take sides or advocate for one side or another, or impose a decision on the parties. Rather, mediators work to turn points of agreement into a fair result for both parties. Mediation procedures are as follows:

1. Parties will receive notice of where and when the mediation will be conducted. If the parties do not reach an agreement, a notice will be issued outlining the facts or circumstances relevant to the attempt to settle the issues. Notice will be given that the complaint has been referred for investigation. If mediation was used successfully, a description of the resolution will be provided. A copy of the agreement will be provided to the complainant and respondent from the conclusion of the mediation session and the agreement will contain the following:
 - a. Signatures of mediator, complainant, and respondent;
 - b. Description of the settlement of the issues; and
 - c. If the parties do not reach an agreement under mediation, the complaint will be referred for investigation.
2. If possible, the ADR process should be completed within **30 calendar days** of receipt of the discrimination complaint. This will assist in keeping within the **90 calendar-day** timeframe of the written NFA if the ADR is not successful.

¹⁷ For more information, see the *Alternative Dispute Resolution (ADR) Process* section below.

3. If resolution is reached under ADR, the agreement will be in writing. A copy of the signed agreement will be sent to the State-Level EO Officer. If an agreement is reached under ADR but a party to the agreement believes the agreement has been breached, the non-breaching party may file a complaint with the CRC within **30 calendar days** of the date on which the non-breaching party learns of the alleged breach.
4. If the parties do not reach resolution under ADR, the Local EO Officer will continue with the investigation, or the complainant may file a complaint with the CRC.

Step 6 Provide a written Notice of Final Action¹⁸

After the Local EO Officer investigates the discrimination complaint and/or participates in ADR, a written NFA must be provided to the complainant within **90 days** of the date on which the complaint was filed. The notice will contain, for each issue raised in the complaint, a statement of either:

- The recipient's decision on the issue and an explanation of the reasons underlying the decision; or
- A description of the way the parties resolved the issue; and
- A statement that the NFA is issued during the **90-day** period, and the complainant is dissatisfied with the decision. The complainant, or his or her representative, has a right to file a complaint with the Civil Rights Center within **30 days** of the date on which the complainant receives the NFA. Only the Director of the Civil Rights Center may extend the **30-day** time limit for good cause. The complainant has the burden of proving, to the Director of the Civil Rights Center, that the time limit should be extended.

If, by the end of the **90 days** from the date on which the complainant filed the complaint, the Local EO Officer has not completed its processing of the complaint or failed to issue a NFA, the complainant, or the complainant's representative, may file a complaint with the Civil Rights Center within **30 days** of the expiration of the **90-day period**. In other words, the complaint must be filed with the Civil Rights Center within **120 days** of the date on which the Local EO Officer received the complaint.

Action

Local areas must develop discrimination complaint procedures as required in 29 CFR 38.72 and 29 CFR 38.73.

Attachments

Attachment A - Discrimination Complaint Process Flowchart

Attachment B - Example: Initial Written Notice of Receipt Letter

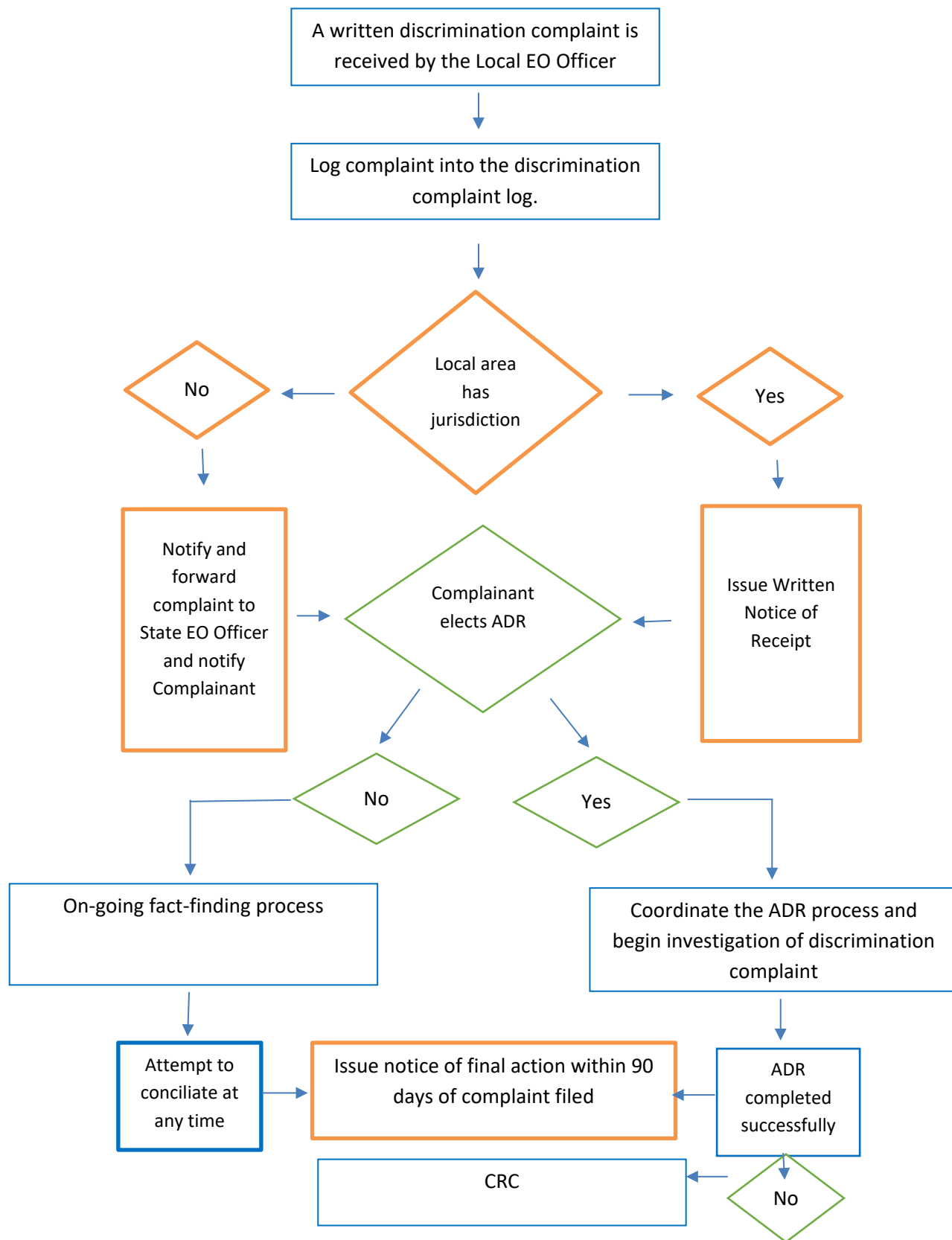
Attachment C - Example: Notice of Final Action Letter

Additional Information

Questions regarding the content of this publication should be directed to eo@dwd.in.gov.

¹⁸ See Attachment C *Example: Notice of Final Action*.

Attachment A Discrimination Complaint Process



Attachment B
Example: Initial Written Notice of Receipt Letter

NOTICE OF RECEIPT

Date:

Attorney or Complainant Name
Attorney or Complainant Address
Attorney or Complainant City, State, Zip

Re: WIOA Complaint by (name of complainant)

Dear

The (recipient) received the discrimination complaint ("Complaint") dated XXXXXX, submitted by name of complainant ("Complainant") by counsel XXXXXXX.

Notices required by 29 CFR § 38.72(b)(1)

Pursuant to 29 CFR §38.72(b)(1)(i), the Department acknowledges that the Complaint has been received.

Pursuant to 29 CFR §§ 38.71 and 38.72(b)(1)(ii), Complainant has the right to be represented by an attorney or other individual of their choice.

Pursuant to 29 CFR § 38.72(b)(1)(iii), find enclosed a notice of rights.

Pursuant to 29 CFR § 38.72(b)(1)(iv), Complainant has the right to request and receive, at no cost, auxiliary aids and services, language assistance services, and this notice will be translated into the non-English languages as required in 29 CFR §§ 38.4(h) and (i), 38.34, and 38.36.

The Complaint

The Complaint alleges the (Recipient) discriminated against Complainant due to Complainant's xxxxxx. Specifically, the Complaint alleges the following:

Issue #1 – On (date), at the (location), xxxxxxxx.

Acceptance of Issues for Investigation & Procedure

The (recipient) accepts the issue in the Complaint for investigation.

The (recipient) will conduct a 60-day fact finding and attempt a satisfactory resolution with Complainant, by counsel. At any point within those 60 days, any party can request the use of an Alternative Dispute Resolution (ADR) process, such as mediation.

The (recipient) will issue a Notice of Final Action on the complaint within 90 days of the date the Complaint was filed. Therefore, the (recipient) may issue a Notice of Final Action in this matter on or before **(date)**. If Complainant is dissatisfied with the (recipient's) decision or resolution, the Complainant may file a complaint with the Director of the Civil Rights Center (CRC) for the U.S. Department of Labor at <https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/external/how-to-file-complaint>. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action.

If the Department does not give you a written Notice of Final Action within 90 days of the day on which you filed your complaint, you may file a complaint with CRC before receiving that Notice. However, you must file your CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which you filed your complaint with the recipient).

Sincerely,

(Name of Local EO Officer)
Equal Opportunity Officer
Address:
Phone:
(email)
(web)

Attachment C
Example: Notice of Final Action Letter

Complainant or Representing Attorney

Date:

Name and Address

Re: WIOA Complaint by (complainant)

Dear (Complainant or representing attorney):

Notice of Final Action (NFA)

By Notice of Acceptance dated (enter date), the parties were notified of an accepted complaint of discrimination filed by (Name of Complainant”), against the (recipient’s name).

The Complainant alleges that the (recipient) discriminated against the Complainant on the basis of XXXXX, in violation of Section 188 of the Workforce Innovation and Opportunity Act (“WIOA”). The complaint was filed timely, and all other jurisdictional requirements are met.

Issues Accepted

The following issues were accepted for investigation in the Notice of Acceptance and are the subject of this Notice of Final Action:

Issue #1 – On (date), at the (location of complaint), XXXXXXXX.

Findings of Fact

Based on documentation during the investigation, the (recipient) makes the following findings of fact:

1. XXXXXXXX.

Conclusion

Regarding the Issues Accepted for this investigation, and based on the foregoing Findings of Fact, it is concluded that XXXXXXXX.

Remedies

The (recipient) is committed to providing equal opportunity and equal access to all individuals in programs and activities funded by Title I of the Workforce Innovation and Opportunity Act (WIOA) (29 USC 3248) and its implementing Regulations (Final Rule, 29 CFR Part 38). Based on our investigation, the following actions have been or will be taken to ensure those remedies are addressed.

XXXXXXXXXX

Notice of Right to File with Civil Rights Center

If the Complainant is dissatisfied with this Notice of Final Action, you may file a complaint with the Civil Rights Center, U.S. Department of Labor, 200 Constitution Avenue, Washington, DC 20210.¹⁹ The complaint must be filed within 30 days of the date on which you receive this Notice of Final Action.

Sincerely,

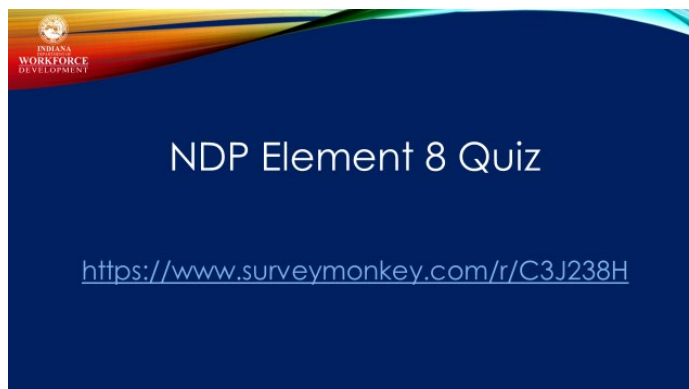
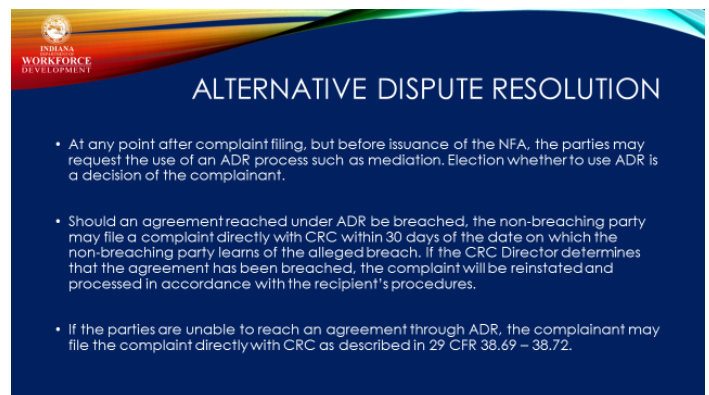
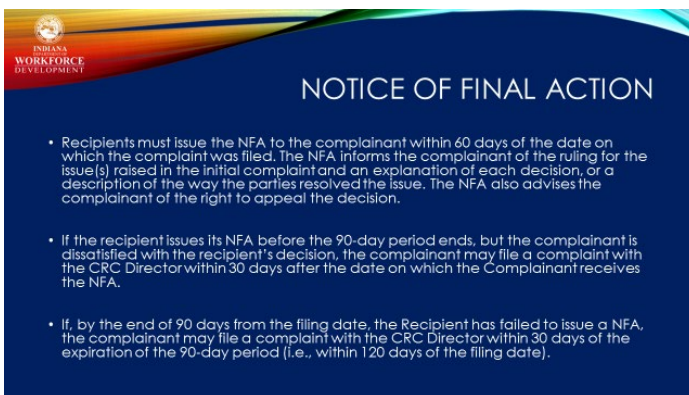
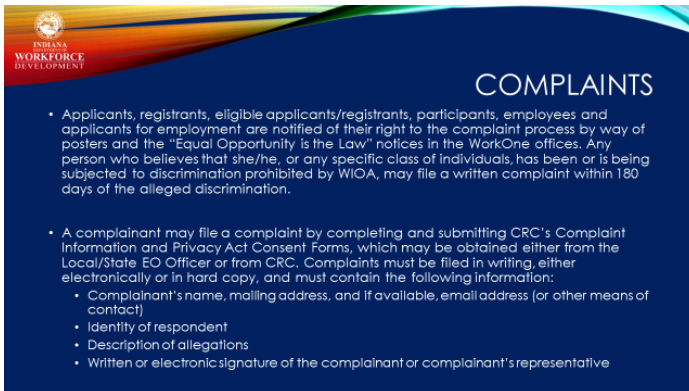
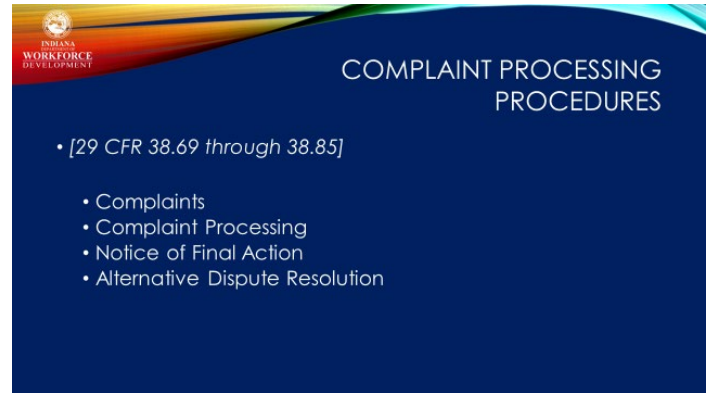
(Name of EO Officer)

Equal Opportunity Officer

(Name of Recipient)

(Recipient address, phone, email,
and web address)

¹⁹ See <https://www.dol.gov/agencies/oasam/centers-offices/civil-rights-center/external/how-to-file-complaint>.





Sample Mediation Agreement Form from ICRC

ERIC HOLCOMB, Governor

GREGORY WILSON, Executive Director

RESPONDENT'S AGREEMENT TO BEGIN MEDIATION

ICRC No.: [REDACTED]

EEOC/HUD No: [REDACTED]

I, Lyndsey Hellem, agree to enter into voluntary mediation and agree to the following:

- Abide by the ground rules established by the mediator;
- Be willing to listen respectfully, sincerely try to understand the other person's needs and interests and work at a reasonable resolution;
- Keep information shared in the mediation session in confidence;
- Come with an open mind, understanding that this is a process where there are no admissions, but rather where negotiations are made to reach a fair solution for all parties;
- To stay away from establishing hard positions, but instead express the outcomes we wish to realize;
- Understand that the mediator will make NO binding determination and the Complainant's right to proceed legally will not be affected in the event that no agreement is reached
- To be polite and respectful of all the parties participating in the mediation and to actively participate in an orderly manner. There will be no blame or attack, refraining from unproductive arguing, venting, or narration, and agree at all times to use our time in mediation to work toward what we perceive to be our fairest and most constructive agreement possible.

Signature:

Phone Number:

[REDACTED]

Date:

1/25/2018

Email:

[REDACTED]

*A mediator will contact you as soon as the form is received.



100 NORTH SENATE AVENUE, Room N300 | INDIANAPOLIS, INDIANA 46204

317.232.2600 office | 317.232.6580 facsimile | 800.628.2909 toll free | WWW.IN.GOV/ICRC

Element 9: Corrective Actions/ Sanctions

[29 CFR 38.86 through 38.115]

If voluntary efforts in seeking compliance fail, corrective actions, or sanctions, may be imposed for violations of EO/Nondiscrimination requirements per 29 CFR Part 38. Sanctions are imposed as a last resort, with technical assistance, guidance, and corrective action opportunities offered first.

Corrective Actions

Corrective actions must be designed to completely address each violation and may result from an annual monitoring review, a discrimination complaint, or both. Recipients must have procedures in place for obtaining prompt corrective action. Local EO Officers must notify the State EO Officer of violations discovered, corrective actions implemented, and timeframes for completion.

If the State EO Officer determines a violation has occurred, the recipient will be notified and corrective action, including anticipated resolution timelines, will be required.¹¹¹ The State EO Officer and/or Compliance and Policy Workforce Division Monitoring Resolution staff will provide technical guidance and thoroughly track the resolution process. If a recipient does not undertake the corrective actions specified, a conciliation agreement should be initiated and completed based on the model outlined in 29 CFR Part 38.

Sanctions

Generally speaking, and as provided in DWD Policy,¹¹² sanctions may be necessary when a recipient refuses to implement voluntary corrective action, submit requested data or documentation, or refuses to provide access to premises or records during a compliance review. **Sanctions are considered as a last resort, and may include, but not be limited to:**

- Termination or reduction of funding;
- Disallowance of selected costs;
- Restriction from bidding on competitive or discretionary funds.

Since last submission DWD is working on incorporating accountability process for sanctions and EO will be included in the notice of consequence.

¹¹¹ Documentation 9.1: Sample Resolution Document

¹¹² DWD Policy 2016-09 (See Documentation 1.5)

Element 9 Documentation

Documentation 9.1: Sample Resolution Document

**COMPREHENSIVE MONITORING REPORT
PROGRAM YEAR 2021-22**

RESOLUTION TRACKING DOCUMENT

Local Workforce Development Area 12

Indianapolis Private Industry Council, Inc. d/b/a EmployIndy
 PNC Center/Hyatt Building
 101 W. Washington St., East Tower, Suite 1200
 Indianapolis, IN 46204

Compliance Findings:

Finding #1: Lack of Procedures for Implementing Priority of Service Policy

According to the EmployIndy Priority of Service (POS) Policy, "All WIOA Title I service providers must develop procedures detailing how they will identify priority of service populations, how they will prioritize individualized and training services to these individuals, and how they will monitor and adjust services." The Compliance Team requested these procedures. The LWDA provided two PowerPoint presentations and explained that Eckerd uses these to train its career navigators on the LWDA's POS policy. The LWDA explained that all WIOA and Wagner-Peyser staff are required to take this training and that a post-test asks for staff to indicate the POS populations. However, neither of the slide decks identify the POS populations or provide procedures for how staff should identify if clients fit into one or more of the POS populations.

To ensure that LWDA 12's POS clients, as detailed in TEGL 7-10 and DWD Policy 2019-04, Change 1, are consistently identified and to comply with its own policy, the LWDA needs to develop procedures and train its staff to utilize.

Finding #1: Corrective Action Required:

LWDA 12 must require its WIOA Adult service providers to develop POS procedures and train its staff on implementing these procedures. The LWDA must submit documentation to the Compliance Team that includes a plan for training all staff and a timeline for when this training will be completed. LWDA 12 must submit a plan to correct this issue via the attached Resolution Tracking Document and include supporting documentation as applicable to oversight@dwd.in.gov within 30 days of the date of this Report.

Finding #1 | LWDA 12 - Response #1

(Use Tab Key to move between text fields. Please email this completed form and any additional supporting documentation to oversight@dwd.in.gov.)

Date: 5/25/22

Response: *The service provider, Eckerd Connects, Inc. has developed a policy, titled Eckerd WOI Adult POS Policy, as requested and it is attached to this email. Eckerd will continue to provide training to all staff when onboarding in their first few weeks of being hired. WIOA Adult POS policy/procedure is also covered with Eckerd's career navigators when they complete WIOA*

enrollment training. Priority of Service in general is reviewed again with all staff at least annually.

Finding #1 | DWD Compliance Team - Response #1

Date: *June 13, 2022*

Response: **RESOLVED**

The DWD Compliance Team has reviewed the LWDA's response to Finding #1 and has determined the finding is resolved. During the next monitoring cycle, DWD will review the POS policy, processes, and training.

Finding #2: Lack of EO Monitoring

Per 29 CFR 38.31, 29 CFR 38.33, DWD Policy 2016-09, and the State of Indiana Nondiscrimination Plan 2020-2022, Local EO Officers are required to conduct annual WIOA EO monitoring to ensure compliance with EO requirements. DWD's PY20 monitoring completed in February 2021 identified that LWDA 12 had not conducted EO monitoring since March 2019. Plans for monitoring were discussed with the Local EO Officer and an area of concern was written in the PY20 DWD monitoring report stating the LWDA needed to ensure that EO monitoring is conducted on an annual basis.

During this year's review DWD learned that the LWDA still had not conducted EO monitoring since March 2019. Based on conversation with the Local EO Officer, DWD understands that the LWDA has plans to conduct EO monitoring in the fourth quarter of PY21 and has revised its monitoring process so that it is performed more than just annually. While DWD is pleased to learn of these plans for future monitoring, it was unclear why the LWDA had not completed EO monitoring in the 12 months between DWD's PY20 and PY21 WIOA compliance reviews. As a result of not monitoring, the LWDA may not be aware of potential EO-related issues that could negatively impact service delivery to clients.

Finding #2: Corrective Action Required

LWDA 12 must provide the DWD Compliance Team a plan for ensuring that annual EO monitoring is conducted as outlined in 29 CFR 38.31, 29 CFR 38.33, DWD Policy 2016-09, and the State of Indiana Nondiscrimination Plan 2020-2022. At a minimum LWDA 12's plan, should include the frequency of monitoring, a timeline for when monitoring will be conducted, a description of the monitoring activities, the position(s) responsible for conducting the monitoring, a list of the entities that will be monitored, how monitoring results will be documented and communicated, and the follow up process for how violations will be addressed and prevented going forward. LWDA 12 must also provide any monitoring tool(s) it plans to use for EO monitoring. The LWDA must also provide the State EO Officer with all completed EO monitoring tools and results once completed for PY21.

LWDA 12 must submit a plan to correct this issue via the attached Resolution Tracking Document and include supporting documentation as applicable to oversight@dwd.in.gov within 30 days of the date of this Report.

Finding #2 | LWDA 12 - Response #1

(Use Tab Key to move between text fields. Please email this completed form and any additional supporting documentation to oversight@dwd.in.gov.)

Date: *5/25/22*

Response: Region 12 will conduct an annual EO monitoring of all local WIOA Title I subrecipients the week of June 27, representing an account of Equal Opportunity compliance for PY 2021. The monitoring will be coordinated and primarily conducted by Kevin Duffy, the Local EO Officer. Monitoring of all WIOA Title I subrecipients will be conducted using the attached WIOA EO Monitoring tool and will include an on-site visit as well as an interview with at least one member of management and one case manager. Additionally, The WorkOne Indy office will be monitored with the DWD-prescribed ADA and VR compliance checklist tools.

EmployIndy conducts programmatic monitoring of its WIOA subrecipients on a quarterly basis. At the conclusion of these monitorings, subrecipients with outstanding issues are served a performance optimization plan (POP) that prescribes corrective actions and helpful resources to improve performance. Subrecipients are given 30 days to complete the POP and any issues are checked again at the next quarterly monitoring for a pattern of noncompliance. For the purposes of the EO monitoring, any outstanding issues will be incorporated into the regularly scheduled POP.

Both monitoring results and POPs are stored on an internal Google Drive. At the conclusion of this year's EO monitoring, both the results and the corresponding POPs will be forwarded to the State EO Officer.

Finding #2 | DWD Compliance Team - Response #1

Date: June 13, 2022

Response: **RESOLVED**

The DWD Compliance Team has reviewed the LWDA's response to Finding #2 and has determined that the finding is resolved. In the next monitoring cycle, the Compliance Team will review the LWDA's EO Local Monitoring report along with monitoring results.

Finding #3: Lack of Procedure for Processing Discrimination Complaints

29 CFR 38.31 requires Local EO Officers to develop and publish procedures for processing discrimination complaints, which are established under 29 CFR 38.72 through 29 CFR 38.76. Related responsibilities include tracking discrimination complaints filed against the recipient, developing procedures for investigating and resolving discrimination complaints filed against the recipient, and ensuring that those procedures are followed.

DWD identified this issue as a finding in LWDA 12's PY20 WIOA compliance review report. As a result, the Local EO Officer reported that the LWDA hosted training to remedy the issue, however, the training was not specific to EO discrimination complaints. The LWDA is required to have specific discrimination complaint procedures for all service providers/subrecipients of WIOA funds and this includes having step-by-step procedures for processing complaints. DWD highly recommends that LWDA 12 review DWD's recently issued technical assistance guide on complaint processing procedures posted on DWD's policy and technical assistance page <https://www.in.gov/dwd/compliance-policy/policy/>.

Finding #3: Corrective Action Required

LWDA 12 must provide specific, step by step EO discrimination complaint procedures as referenced in 29 CFR 38.72 through 29 CFR 38.76. The LWDA must also provide its plans for sharing the procedures with all of its service providers and sub-recipients, training staff on discrimination complaints, and include a timeline for this training to be completed. This plan

must be submitted via the attached Resolution Tracking Document and include supporting documentation as applicable to oversight@dwd.in.gov within 30 days of the date of this Report.

Finding #3 | LWDA 12 - Response #1

(Use Tab Key to move between text fields. Please email this completed form and any additional supporting documentation to oversight@dwd.in.gov.)

Date: 5/25/22

Response: Region 12 is working to update our complaint procedures to incorporate the guidance found in DWD Technical Assistance 2021-07: Complaint Procedures for WIOA Nondiscrimination and Equal Opportunity Provisions. A draft is attached to this response. Once finalized, WorkOne staff will be trained at the monthly Staff Enrichment on July 21. Out of school youth providers will be trained at their monthly network meeting in July. Additionally, online tutorials on how to handle both general and discrimination complaints will be developed over the course of 2022, and the procedure will be stored and accessible on our online Resource Library.

Finding #3 | DWD Compliance Team - Response #1

Date: June 13, 2022

Response: **RESOLVED**

The DWD Compliance Team has reviewed the LWDA 's response to Finding #3 and has determined that the finding is resolved. In the next monitoring cycle, the Compliance Team will review the LWDA's EO Complaint procedures including details on the training of internal and service provider staff.