

☑ Mandatory
$\square$ Informational
$\square$ Best Practice
□ Other

### **TECHNICAL ASSISTANCE**

Date: 03/18/2024

**Contact:** <u>policy@dwd.in.gov</u>

**Program:** Wagner-Peyser Employment Services and Programs

**Subject:** DWD Technical Assistance 2023-13

**Employment Service Self-Appraisal System** 

# **Purpose**

To describe Indiana's Employment Service (ES) self-appraisal system, through which the Indiana Department of Workforce Development (DWD) will evaluate ES operations at both the ES Office level and at the State Workforce Agency (SWA) level.

# References

20 CFR Part 658 Subpart G

## Definitions<sup>1</sup>

**Employment Service (ES) office** means a site<sup>2</sup> that provides ES services as a one-stop partner program.

#### Content

Wagner-Peyser regulations require each SWA to establish and maintain a self-appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance. The self-appraisal system must include a numerical (quantitative) appraisal and a non-numerical (qualitative) appraisal.

# **Quarterly Numerical Appraisal**

#### ES Office Level<sup>3</sup>

DWD will compare ES office quarterly performance levels against planned service levels as stated in the Indiana WIOA State Plan.<sup>4</sup> Office level data will be aggregated by the DWD Strategy and Design Team and presented to DWD Field Operations Management in a quarterly report.

<sup>&</sup>lt;sup>1</sup> 20 CFR 651.10.

<sup>&</sup>lt;sup>2</sup> A site must be collocated in a one-stop center consistent with the requirements of 20 CFR 678.305 through 678.315.

<sup>&</sup>lt;sup>3</sup> 20 CFR 658.601(a)(1).

<sup>&</sup>lt;sup>4</sup> The WIOA State Plan must be consistent with numerical goals contained in ES office plans.

- If there are no significant differences<sup>5</sup> between achievement and plan levels, the report must be:
  - Shared with the Regional Support Managers (RSM);
  - o Signed by Field Operations Management to indicate acknowledgement; and
  - Sent to DWDWagnerPeyserES@dwd.in.gov with no further action required.
- If there are significant differences between achievement and plan levels:
  - The DWD Strategy and Design Team must conduct an analysis to isolate contributing factors (i.e., compared to past levels, any non-numerical factors, etc.). This analysis may involve the RSMs, the one-stop office managers, and other local office staff, as needed.
  - After the analysis has been completed, a corrective action plan must be developed by the RSMs and the one-stop office manager. Local Workforce Development Board Executive Directors should be made aware of this plan. The DWD Strategy and Design Team will approve the proposed corrective action plan and provide feedback on the content of the plan. The execution of items contained in the corrective action plan is the responsibility of the RSM.
  - The quarterly report, analysis of deficiencies, and any corrective plans and results must be submitted to DWDWagnerPeyserES@dwd.in.gov by September for the preceding program year.

### SWA Level<sup>7</sup>

DWD will review statewide data and performance against planned service levels as stated in the Indiana WIOA State Plan to identify significant statewide deficiencies and to determine the need for additional analysis including identification of trends, comparisons to past performance, and attainment of state plan goals.

- The DWD Strategy and Design Team will aggregate the ES Office Level Numerical Reviews and conduct a statewide review of the results. The DWD Strategy and Design Team will share the initial review results with DWD's Chief Workforce Officer.
- If significant deficiencies<sup>8</sup> exist, DWD's Chief Workforce Officer and anyone they designate to assist with the process will determine if additional analysis is needed. DWD's Chief Workforce Officer and their designees, in collaboration with the DWD Strategy and Design Team, will then develop a corrective action plan.
- The quarterly report, analysis of deficiencies, and any corrective actions and results must be submitted to DWDWagnerPeyserES@dwd.in.gov. The DWD Strategy and Design Team will then submit the documents to the ETA regional office.

<sup>&</sup>lt;sup>5</sup> Significant differences will be identified using the negotiated Wagner-Peyser performance metrics.

<sup>&</sup>lt;sup>6</sup> See the *Corrective Action Plan Requirements* section below for details.

<sup>&</sup>lt;sup>7</sup> 20 CFR 658.601(a)(2).

<sup>&</sup>lt;sup>8</sup> Significant deficiencies will be identified using the negotiated Wagner-Peyser performance metrics.

### **Annual Non-Numerical (Qualitative) Review**

#### ES Office Level<sup>9</sup>

The DWD Strategy and Design Team has developed a review tool for the RSMs to conduct the qualitative review of each office. This review tool will be available through the DWD Intranet. The tool includes an assessment of the following factors:

- Appropriateness of services provided to participants and employers;
- Timely delivery of services to participants and employers;
- Staff responsiveness to individual participants and employer needs;
- Thoroughness and accuracy of documents prepared in the course of service delivery; and
- Effectiveness of ES interface with external organizations, such as other ETA-funded programs, community groups, etc.

Utilizing the standardized review tool, the RSMs will conduct a qualitative review of each ES office in a region that they do not manage. For example, the Region 1 RSM would review Region 2 rather than their own region. The tool requires:

- Review of files created throughout the program year in each office (both affiliate and comprehensive);
  - The number of files reviewed per office will be determined based on the number of Wagner-Peyser participants the office has served and the number of Wagner-Peyser complaints the office has received.
- Aggregate review of Wagner-Peyser complaints received in each office;
- Collection of information from business services; and
- Interviews with staff.

The RSM will share the results of their reviews with DWD Field Operations Management. In examining the results of the RSM office reviews, DWD Field Operations Management will determine if the reports are thorough, if a corrective action plan is appropriate, and if there is a need for higher level involvement.

- If deficiencies are identified, the RSM, one-stop office manager, DWD Field Operations
  Management, and any other necessary parties must develop a corrective action plan and must
  submit the template to the DWDWagnerPeyserES@dwd.in.gov within 30 days of the receipt of
  the results of the appraisal.
- If no deficiencies exist, DWD Field Operations Management must sign off on the report to indicate acknowledgement and submit it to DWDWagnerPeyserES@dwd.in.gov.

DWD's Strategy and Design Team will aggregate the results of the reviews and any corrective action plans.

<sup>9 20</sup> CFR 658.601(a)(3).

## SWA Level<sup>10</sup>

The DWD Strategy and Design Team will aggregate the ES Office Non-Numerical Reviews and conduct a statewide review of the results. This annual review is due in October following the program year.

Documented analysis, deficiencies, and corrective actions as a result of the Non-Numerical Review will be shared with the Chief Workforce Officer, tracked, and filed.

# Corrective Action Plan Requirements<sup>11</sup>

If a corrective action plan is determined to be necessary, the following steps must be taken.

- For an ES Office-level review, the RSM, in collaboration with the local area, must submit the completed template to DWDWagnerPeyserES@dwd.in.gov within 30 days of receipt of the results of the appraisal.
- For a SWA-level review, the Chief Workforce Officer and those assisting with the review must submit the template to DWDWagnerPeyserES@dwd.in.gov within 30 days of the receipt of the results of the appraisal.

Corrective action plans must include:

- 1. Specific descriptions of the type of action to be taken, the time frame involved, and the assignment of responsibility;
- 2. Provision for the delivery of technical assistance as needed;
- 3. A plan to conduct follow-up on a timely basis to determine if actions taken to correct the deficiencies have been effective; and
- 4. A point of contact who will be responsible for monitoring the corrective action plan and ensuring it is executed within the timeframe specified.

# **DWD Oversight and Monitoring**<sup>12</sup>

As part of DWD's oversight responsibilities, the Compliance Team will complete onsite reviews in those ES offices which show continuing internal problems or deficiencies in performance as indicated by such sources as data analysis, non-numerical appraisal, or other sources of information. These onsite reviews, if necessary, will take place at the same time as the local area's annual WIOA monitoring reviews when possible.

### **Action**

All Wagner-Peyser staff, one-stop office managers, and local area leadership must familiarize themselves with this technical assistance and comply with the role they have been assigned through this technical assistance and federal guidance.

#### **Additional Information**

Questions regarding the content of this publication should be directed to <a href="mailto:policy@dwd.in.gov">policy@dwd.in.gov</a>.

<sup>&</sup>lt;sup>10</sup> 20 CFR 658.601(a)(5).

<sup>&</sup>lt;sup>11</sup> 20 CFR 658.601(a)(6).

<sup>12 20</sup> CFR 658.601(a)(4).