



VI. PROGRAM-SPECIFIC STATE PLAN REQUIREMENTS FOR CORE PROGRAMS

Adult, Dislocated Worker, and Youth Activities Under Title I-B

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

(a) General Requirements

1. Regions and Local Workforce Development Areas

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

Indiana's twelve (12) local workforce development areas (LWDAs) are aligned in geographic composition, with "LWDA" used interchangeably when referencing either. All LWDAs are single Regions with the exception of LWDA 5 and 12, which are combined as a Planning Region.

Indiana's LWDAs consist of the following counties:

- Region 1: Lake, Porter, LaPorte, Newton, Jasper, Pulaski, Starke
- Region 2: St. Joseph, Elkhart, Marshall, Kosciusko, Fulton
- Region 3: LaGrange, Steuben, DeKalb, Whitley, Allen, Wabash, Huntington, Wells, Adams, Grant
- Region 4: Benton, White, Cass, Miami, Carroll, Howard, Tippecanoe, Warren, Fountain, Montgomery, Clinton, Tipton
- Region 5/12: Marion, Boone, Hamilton, Madison, Hancock, Shelby, Johnson, Morgan, Hendricks
- Region 6: Jay, Blackford, Delaware, Randolph, Henry, Wayne, Rush, Fayette, Union
- Region 7: Vermillion, Parke, Putnam, Vigo, Clay, Sullivan
- Region 8: Brown, Monroe, Owen, Greene, Lawrence, Daviess, Martin, Orange
- Region 9: Bartholomew, Decatur, Franklin, Jackson, Jennings, Ripley, Dearborn, Jefferson, Switzerland, Ohio
- Region 10: Crawford, Washington, Scott, Clark, Floyd, Harrison
- Region 11: Knox, Gibson, Pike, Dubois, Posey, Vanderburgh, Warrick, Spencer, Perry
- Region 12: Marion

B. Describe the process and policy used for designating local areas, including procedures for determining whether the local area met the criteria for "performed successfully" and "sustained fiscal integrity" in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions.

Indiana's local areas received initial designation approval from the Governor to maintain current local area designations during WIOA implementation in 2015 (WIOA Implementation Guidance WIOA T1-(107) P1) following written requests for designation pursuant to WIOA 106(b)(2) and TEGL 27-14.

In determining current local area (and regional) designations under WIOA, the State took part in a taskforce of the Indiana Career Council, which was focused on assessing system alignment. This taskforce thoroughly reviewed and discussed the workforce development board areas to determine



if the 12 areas should be modified. After several meetings, which included input from local boards, the recommendation of the task force was to have the standing (WIA) local areas remain intact.

For initial designation, all 12 of the existing local areas met the criteria for performing successfully and maintaining fiscal integrity, as outlined in WIOA section 106(b)(2) and (3). Indiana verified, and continues to verify on an ongoing basis, these requirements through data reporting and monitoring efforts. Indiana has continued this structure through the State and local planning process, aligning its twelve local areas with its twelve WIOA regions. Indiana's policy and criteria for designating regions is available at: <https://www.in.gov/dwd/activepolicies.htm>. Indiana has one current regional planning area consisting of local areas 5 and 12. Additionally, interstate planning is underway with Kentucky.

*Since initial designations were approved, there have been no requests to retract or change designation status, and thus, the local areas and CEOs are considered to have requested continued designation pursuant to 20 CFR 679.250(e).

Note: Indiana is working to finalize guidance to capture the local area designation process and procedures, beyond that which is currently discussed regarding designation of regions in DWD Policy 2017-11. The guidance will be consistent with 20 CFR 679.230 – 290 and other federal guidance.

Indiana's process will follow the below general outline:

General procedural requirements for designation of local areas: The Governor will consult with the Governor's Workforce Cabinet (GWC), the Indiana Department of Workforce Development (DWD), the Chief Elected Officials (CEOs) and affected local workforce development boards (LWDBs). The process will include a public comment period before approval of a local area designation.

New Requests for designation: Designation or redesignation will take into consideration the extent to which the proposed area:

- is consistent with the labor market;
- is consistent with regional economic development within the State; and
- Has available Federal and non-Federal resources necessary to effectively administer activities and provisions required by WIOA, including whether the areas have the appropriate education and training providers, such as institutions of higher education and area career and technical education schools.

The Governor may approve a request at any time for designation as a workforce development area from any unit of general local government, including a combination of such units, if the GWC determines that the area meets applicable designation requirements and recommends designation.

Regardless of whether a local area has been newly designated, or designated via initial or subsequent designation, the Governor may redesignate a local area if the redesignation has been requested by a local area and the Governor approves the request.

Subsequent designations: The Governor may review a designated local area at any time to evaluate whether that the area continues to meet the requirements for subsequent designation under that paragraph. After initial designations, if the chief elected official and LWDB in local area submits a



request for subsequent designation, the Governor must approve the request if the following criteria are met for the two most recent program years of initial designation:

- The local area performed successfully;
- The local area sustained fiscal integrity; and
- In the case of a local area in a planning region, the local area met the regional planning requirements described in WIOA 106(c)(1)

Regarding subsequent designation, as part of the bi-annual local board certification process, DWD Policy 2019-02 requires local areas to assure that they have performed successfully and have sustained fiscal integrity for the preceding two program years. These assurances are also reviewed as part of the State and Local Planning processes. *For purposes of subsequent designation, the local area and chief elected official must be considered to have requested continued designation unless the local area and chief elected official notify the Governor that they no longer seek designation. The following definitions apply to “performed successfully” and “sustained fiscal integrity”:

- *Performed successfully* – means the local area met or exceeded all levels of performance and the local area has not failed any individual measure for the last two (2) consecutive program years
- *Sustained fiscal integrity* - as defined in WIOA sec. 106(e)(2), means that the Secretary has not made a formal determination, during either of the last 2 consecutive years preceding the determination regarding such integrity, that either the grant recipient or the administrative entity of the area misexpended funds provided under subtitle B due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration.

Any units of general local government or grant recipients that request but are not granted initial or subsequent designation as a local area will have the opportunity to submit an appeal to the State Workforce Board (the GWC) in alignment with WIOA 106(b)(5), 20 CFR 683.630-640, and the Appeals process outlined below.

**Note - Indiana is in process of revising WIOA Complaint, Grievance, and Appeals guidance to ensure alignment with this process. Timelines and steps listed below are subject to change in alignment with the State’s appeals and hearing processes.*

C. Provide the appeals process and policy referred to in section 106(b)(5) of WIOA relating to designation of local areas.

Appeals Process. In alignment with WIOA 106(b)(5), a denied request for local area designation by the Governor’s Workforce Cabinet (GWC) may be appealed. An appeal must be submitted in writing (within 30 days of the denial) and must include the reason for appeal, all material originally submitted for consideration, and any additional relevant material responding to the denial from the GWC. An opportunity for a hearing must be provided. In the event of a hearing, it will be scheduled within 60 days of receipt of the appeal. If a decision on the appeal for designation has not been rendered in 90 days (from receipt of appeal) or if designation is denied, the requesting entity may request review by the Secretary of Labor. The Secretary may require that the area be designated as a workforce development area if the Secretary determines that the entity was not accorded



procedural rights under the State appeals process, or if the area meets the designation requirements.

D. Provide the appeals process and policy referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding.

The appeals process relating to determinations for infrastructure funding is outlined within the MOU/IFA and State Funding Mechanism Policies, which can be accessed at:

<https://www.in.gov/dwd/compliance-policy/policy/active/>. If the LWDB is unable to reach an agreement on the funding of infrastructure costs with all partners on or before July 1st of each year (or after the applicable extension of time deadline, if granted), the LWDB or affected partner must notify DWD that an agreement cannot be reached. Once notified, the Governor must administer the State funding formula to determine the appropriate share of infrastructure contributions for all partners for the program year impacted. A required partner may appeal the Governor's determination on the basis of a claim that:

- The Governor's determination is inconsistent with the proportionate share
- The Governor's determination is inconsistent with the cost contribution caps

2. Statewide Activities

A. Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities.

GWC, in consultation with the DWD, develops policy and guidance for the statewide workforce development system. Policies for Title I, Title II, and Unemployment Insurance can be found at <https://www.in.gov/dwd/activepolicies.htm>. This guidance covers, but is not limited to, participant eligibility, priority of service; program standards; performance measures; staff qualifications, roles, and responsibilities; data collection, reporting, and validation; confidential and privileged information; monitoring; property/asset management; funding, allocation, and MOUs; State and local board governance; veterans' services; equal opportunity and nondiscrimination; etc. Specific program guidance can be found at the link provided above.

B. Describe how the State intends to use Governor's set aside funding for mandatory and discretionary activities, including how the State will conduct evaluations of Title I Adult, Dislocated Worker, and Youth activities.

DWD will collaborate, as applicable, with the GWC for use of the Governor's set aside funding during the four-year plan cycle. Indiana has previously utilized set aside funding for innovative projects supporting statewide activities in alignment with 20 CFR 682.210. In past program years, for example, DWD issued Performance Support Grants to local areas seeking to conduct allowable activities supporting the State's focus on areas such as: employer needs, strategies for serving individuals with barriers, increasing number of participants in training, etc.

DWD may also utilize set aside funding to support work in systems, systems alignment, performance improvement strategies across WIOA titles, and in Title I evaluation projects. Indiana is a current participant in the EvalPLC peer learning cohort with fellow states and DOL. The team's focus during the cohort project is to foundation-set for future evaluation work.

C. Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also



should describe any layoff aversion strategies they have implemented to address at-risk companies and workers.

Indiana uses Rapid Response funding to market and host Rapid Response Orientations, Job Fairs and Workshops in response to a Worker Adjustment Retaining Notification (WARN) being submitted, as well as in lieu of a WARN being submitted to reach dislocated workers not affected by a company required to submit a WARN for layoff, closure, or reduction in hours. Local workforce development boards can apply for a Rapid Response Grant from the Indiana Department of Workforce Development (DWD) to assist with Rapid Response activities. If Indiana has exhausted all WIOA funding allocated for Rapid Response, Indiana may pull from the Governor Discretionary fund for Dislocated Workers. Our goal is to use Rapid Response funding to reach any dislocated workers that may be affected by a WARN or Non-WARN, and to upskill where necessary to ensure an individual's swift return to employment. To further support our efforts to connect with businesses that may be looking at imminent layoff, DWD utilizes Dun & Bradstreet's "Market Insight" desktop data in evaluating, and ranking, Hoosier businesses based on financial risk. This critical insight allows DWD to use intelligence from companies in a proactive manner by providing a solutions-based approach to manage economic transitions. This program applies a blend of real time financial fitness and material change data analytics, for our ongoing evaluation. With this analysis, DWD supplies leads to local areas for consultation before a business catastrophe occurs and before a business and its workers become at risk. This software is in partnership with the Indiana Economic Development Corporation (IEDC) and is used to:

- Consistently analyze labor market data to drive proactive local engagement,
- Approach education and career upskilling in talent fluidly,
- Tap innovative funding sources, and
- Embrace ongoing talent evaluation.

Use of these analytics across Indiana was delayed by the pandemic, however DWD implemented a pilot to develop best practices in several regions. Both State and local business services teams are determining how this information will be utilized and implemented, consistently, statewide. Currently, DWD works closely with three (3) local areas to develop a method and processes to use this information, offer technical assistance, and coordinate with employers to avoid layoffs at the community level. Indiana recently used this tool to analyze the recent layoffs at a local trucking company to evaluate other employer impacts.

Indiana DWD partners with local areas to build and implement Layoff Aversion strategies using the Dun and Bradstreet tool. These strategies leverage Rapid Response funding to support the cost of upskilling workers with their current employer, as well as upskilling of dislocated workers looking for new employment opportunities. Indiana is seeking to expand on this work over the next four years to implement practices that provide early intervention to support businesses and their employees. DWD team align with local areas to review and determine prospects for layoff aversion by analyzing the current level of engagement in the Client Relationship Manager (CRM) system and confirming the outreach strategy based on the plan within the local area. Discussions and strategies include addressing:

- The proposed layoff schedule and the employer's plans to assist the dislocated workers, including the status of any collective bargaining negotiations affecting layoff benefits,



- The need for a voluntary labor management committee or workforce transition committee comprised of representatives of the employer, affected workers, their representatives, and/or other community entities as necessary to assist in planning and overseeing event-specific strategy that supports the reemployment of affected workers (this work typically starts at the State-level but will involve close coordination with the local region. Whether the region steps in to lead or is more of a collaborator with the State depends on regional capacity, skill, and confidence level to manage),
- Appropriate labor representatives to consult and coordinate with when planning Rapid Response activities for impacted workers covered by a collective bargaining agreement,
- The need for peer-to-peer worker outreach to connect dislocated workers with services in conjunction with the labor management committee or its equivalent, and
- Those procedures are in place for the timely access and referral to WorkOne programs, services, and information offered by the WIOA (including Wagner-Peyser), UI, TAA, and other workforce development programs.

Our Market Insight data analytics can also be applied directly to Rapid Response by conducting radius searches of growing businesses in matching occupations. These leads then serve DWD and local areas as immediate connection points to reduce local dislocated impact. These connections could be in service of direct reemployment or alignment to upskilling affected talent in accessing quality jobs. These crucial connections serve our mission of coaching Hoosier businesses to produce their talent, rather than simply consume it. With an unemployment rate that many consider “full employment” we must look beyond churning, immediate jobs, and drive communities into long term talent growth strategies.

D. Describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.

In the case of a natural disaster, the State Rapid Response Unit will work closely with FEMA, the American Red Cross, the Business Services Unit, the local workforce development board, Designated Local Rapid Response Coordinator, and the Economic Development Board to provide services, recovery, and temporary relief by creating jobs through cleanup and restoration efforts. The Rapid Response and Business Services Units will assist in identifying business adversely affected and workers who lost their jobs as a result of the disaster. The Rapid Response and Business Services Unit will work with the local workforce development boards to access existing funding at the State and regional level, as well as determine the need for additional funding through a Disaster National Emergency Grant. The grant will be used to provide additional funding for cleanup and/or humanitarian efforts. DWD will provide technical assistance to the regions as needed and will assist in the efforts to provide the following information and services to the victims of the disaster: Disaster Unemployment Assistance UI claims filing, referrals to FEMA to file claims, and job matching and referrals to partner agencies.

E. Describe how the State provides early intervention (e.g., Rapid Response) and ensures the provision of appropriate career services to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A) and TAA Section 221(a)(2)(A). This description must include how the State disseminates benefit information to provide workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement).



Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition and how the state will ensure the provision of appropriate career service to workers in the groups identified in the petition (TAA Sec. 221(a)(2)(A)).

As of June 30, 2022, the TAA program entered into Sunset termination provision (TEGL 14-22). Under the phased termination of the TAA program, the State is only able to serve and conduct outreach to individuals who had a TAA certification occurring prior to the termination of the program. Under current operations, the State is conducting targeted outreach through individuals identified from a certified company worker list by providing a postcard, conducting phone calls and emails. Additionally, workers are invited to Open House events to engage with TAA and partner staff for services. TAA staff are attending Rapid Response events to engage with workers who may have TAA benefits from past layoffs, petitions are still able to be filed, however U.S. Department of Labor is unable to issue new TAA certifications under termination provisions.

If the TAA program is reauthorized by Congress, the State will resume normal operations as follows:

When a petition is filed that was not the result of a Rapid Response event, the TAA Unit of DWD notifies the region of the petition filing to initiate Rapid Response (RR) events, including initial fact finding and RR event scheduling. Once a certification is made, the TAA Unit disseminates a worker notification letter via mail notifying them of their eligibility for the TAA benefits and services, including case management, training, TRA, job search allowance, relocation allowance, and RTAA. The letter includes notification of deadlines for TRA income support.

Post- certification, in addition to the worker notification letter, Indiana TAA Unit issues Public Service Announcements, digital and/or print newspaper advertisements and extensive social media campaigns to target eligible workers within a certification group to engage them at a local WorkOne. Onsite orientations and in-person Rapid Response activities are offered in conjunction with TAA informational sessions while workers are still employed at a certified firm.

Workforce Development Boards are responsible for coordinating the Rapid Response services at the local level to ensure effective delivery of services. Each Workforce Development Board is responsible for the following:

- Designating a local Rapid Response Representative.
 - The representative may be a Workforce Development Board administrative staff or a local Rapid Response team member.
 - The representative will coordinate with the Regional Managers of Business Service (RM) and Rapid Response Program Director.
 - Representatives will be responsible for contacting the business and introducing Rapid Response services.
- Establishing and maintaining a Local Rapid Response team.
 - Members of the team may include: representatives from the Workforce Development Board, WorkOne staff, service providers, labor organizations and/or State Labor Council (when the workforce is union represented), community/technical colleges, and/or other stakeholders and interested parties.



- Arranging an initial on-site meeting with employers, employee representatives, and Trade Coordinators to assess layoff schedules, determine employer plans to assist the workers, and introduce appropriate onsite Rapid Response activities for the WARN and Trade Act.
- Informing and including TAA coordinators for all onsite meetings including orientations.
- Obtaining a layoff list of affected workers and their contact information when applicable.
- Ensuring all Local Non-WARN notices are entered into ICC and included in the monthly data reports.
- Providing planning assistance for dislocation events.
- Ensuring Rapid Response orientation materials include informational packets on all available services at local WorkOnes and other community resources.
- Providing information on career counseling and job search assistance, resume preparation and interviewing skills workshops, local labor market, education, and training opportunities (WIOA), health benefits (Cobra); and community resources.

(b) Adult and Dislocated Worker Program Requirements

1. Work-Based Training Models.

If the State is utilizing work-based training models (e.g. on-the-job training, incumbent worker training, transitional jobs, and customized training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

The Governor's Workforce Cabinet (GWC) and Indiana Department of Workforce Development (DWD) will continue to engage partners in the development of strategies, frameworks, and models to best implement work-and-learn experiences as a part of the State strategies, including continuing to elevate the importance of work-and-learn models. By partnering with various employers to mitigate challenges and to determine best practices, the State is able to generate employer support for broader participation statewide. Also, participants are able to establish connections directly with potential employers by using this evidence-based approach to career readiness.

Indiana workforce regions have utilized work-based models for many years. On-the-job and customized trainings have been widely used and very effective tools. Indiana's policies are developed to ensure that our providers continually evaluate and improve their work and learn strategies. As we expand the use of work-based learning, we encourage the local workforce development boards to monitor and review work-based learning programs through partnerships with schools, districts, and employers. Often, work-based learning experiences in the K-12 space are designed and evaluated between schools and employers. Our local workforce development boards (LWDBs) can help ensure quality in these experiences for youth and adults by serving as intermediaries for employers, schools, institutions, and other stakeholders.

Indiana is working to increase and improve the work and learn models employed in the State. One specific model that the State is working on to enhance and increase is apprenticeships. Indiana has a high number of existing U.S. Department of Labor registered apprenticeships and, with our work going forward, we intend to increase the opportunities for companies to develop and implement apprenticeship training for potential employees. To that end, the Governor, via executive order, established the Office of Apprenticeship and Work-Based Learning (OWBLA) at DWD to further support federal registered apprenticeships and to create a State model for apprenticeship programs.



The OWBLA has developed a scalable framework for State-level apprenticeship programs, entitled *State Earn and Learn* (SEAL). The SEAL model strategically incorporates related instruction, on-the-job training, and rewards for skill gain, which all lead to an industry-recognized certification. SEALs develop a highly trained employee to fill the talent pipeline for Hoosier employers. These models are scaled across the State through a well-coordinated process between regional Workforce Development Boards and OWBLA regional directors. To ensure maximum outreach, participation, and the leverage of various funding, OWBLA recently entered into agreements with all twelve LWDBs for them to become Registered Intermediaries with U.S. Department of Labor. This new structure will allow for the expansion of registered apprenticeship and SEALs, which can be used as a high-quality pre-apprenticeship program. Additionally, this creates a mechanism for more efficient allocation of future apprenticeship grant funds.

2. Registered Apprenticeship.

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., outreach to sponsors and prospective sponsors, identifying potential participants and connecting them to apprenticeship opportunities).

Indiana continues the statewide expansion of Registered Apprenticeship Programs as comprehensive workforce solutions for business and industry in all economic sectors. Three key elements are helping with this: First, a single office within DWD has been developed to align the products, services, and functionality among four formerly separate DWD divisions to drive solution design and delivery in a more efficient and effective manner. The Office of Workforce Solutions and Engagement is comprised of Employer Engagement, Workforce Education and Training, the Office of Work-Based Learning and Apprenticeship, and Serve Indiana. Second, all twelve local workforce development boards (LWDBs) are registered intermediaries, with many of them also working as sponsors. Finally, the Office of Work-Based Learning and Apprenticeship (OWBLA) is developing several technical assistance tools, such as the Post-Secondary Model Program Guidance and the Indiana Apprenticeship Continuum, to aid in the alignment of State agencies and training providers.

The Office of Workforce Solutions and Engagement

The Office has played several roles in the State Plan over the years. However, this has happened as separate and distinct offices – Workforce Education and Training, Employer Engagement, and the Office of Work-Based Learning and Apprenticeship which was originally stood up in 2018 to focus on growing work-based learning in Indiana. Since the first quarter of 2022, these offices, along with Serve Indiana (AmeriCorps), have been working as one unit to address both talent attraction and talent retention. This division proactively engages with the LWDBs and employers to identify employer needs and to provide an array of strategies and solutions to address today's needs and tomorrow's growth as well as overall culture and employee satisfaction. We have been able to identify opportunities for cross-functional work among the personnel of the four formerly separate offices as well as the potential for braiding different funding streams to help employers and individuals.

The office has a unique blend of subject matters experts with backgrounds in secondary education, post-secondary education and training, data analytics, business development, career exploration and coaching, and human capital. While truly listening to the customer, working in one office affords us the opportunity to capitalize on this expertise at a pace that aligns with business. At the center of the solution is work-based learning programs, built for both talent attraction and incumbent worker



retention, with a focus on middle and high-level skilled occupations. Key to success is the assurance of quality, which comes from having a joint staff of industry and education experts as mentioned above, and a multi-step certification and approval process. And, contrary to misguided belief, these programs are not an alternative to a “traditional four-year degree.” These programs allow the individual and the company to grow by potentially including industry credentials, college credit, certificates, and college degrees.

While Indiana has come a long way in the past several years in the area of apprenticeship, not all states share in this success. Indiana boasts two successful, comprehensive work-based learning programs: Registered Apprenticeship (RAP) and certified *State Earn and Learn* (SEAL). Each program works well independently, but they also work very well together with SEALs fulfilling the role of Pre-Apprenticeship Programs when an articulation agreement is in place. We have seen significant growth in both programs and participants since OWBLA was stood up in June of 2018, with Indiana as one of the top states in the nation in number of apprentices per workforce capita. We expect to see continued growth, especially in non-traditional sectors, as the Office of Workforce Solutions and Engagement firmly believes that businesses should be talent producers and not just consumers.

Local Workforce Development Boards (LWDBs) as Registered Intermediaries / Sponsors

As of January 2020, all twelve LWDBs had become registered apprenticeship intermediaries, with each having entered into a sub-grantee relationship with DWD in order to develop and scale registered apprenticeship programs in each region across Indiana. The intermediaries are responsible for the outreach and collaboration efforts, RAP expansion, and the development of RAPs, SEALs, and Pre-RAPs. Some regions are now sponsors that also execute the registration and reporting to U.S. Department of Labor. Intermediaries report program and individual participant data at the State level through the State’s Indiana Career Connect (ICC) and Client Relationship Manager (CRM) systems. This structure supports State Plan goals to allow local areas to drive efforts to attract and retain apprentices for high-wage, high-demand jobs that meet the economic needs of the individual region.

Since 2018, DWD has received the SAE, ASE, SAE2020, ABA, and SAEF apprenticeship grants from the U.S. Department of Labor. Through the support of these grants, DWD has been able to collaborate with the U.S. Department of Labor Office of Apprenticeship in Indiana, the LWDBs, Ivy Tech Community College, Vincennes University, various sector partnerships, and secondary and post-secondary Career and Technical Education (CTE) and Adult Education programs. As of the 2022 program year, Indiana was reporting 17,185 apprentices in over nine hundred programs, with 58 new RAPs being approved during that period.¹ However, Indiana still lacks much needed diversity in terms of ethnicity, gender, and socio-economic status. While we have made good progress with our grants, we believe that our LWDBs are in an excellent position to utilize State, WIOA, RAP, and regional resources to reach businesses, develop programs, braid funding, and identify potential talent pools from our target populations, to include:

¹ U.S. Department of Labor. Registered Apprenticeship National Results Fiscal Year 2018.



- **Veterans:** Purdue University was one of the grantees that received grant dollars through the Presidential Executive Order Expanding Apprenticeships specifically targeting veterans.² We will look to create more partnerships between INVets and employers that provide registered apprenticeship opportunities. Connecting the skill sets that veterans have gained during their time of service to these opportunities will provide a benefit to both veterans living in Indiana and our employer community.
- **Women:** While we see good growth in healthcare apprenticeship, greater access to registered apprenticeships in the skilled trades can help women achieve economic security and fill predicted skills shortages in these sectors. From Pre-RAPs to RAPs, opportunities to earn and learn in these trades provide good careers with family-sustaining earnings and long-term employment. While RAPs in the trades offer good jobs with benefits, only a small portion of apprentices in the trades are women. Pre-Raps can provide women with the foundational skills, supports, networks, and knowledge needed for entering and succeeding in an apprenticeship. As our WorkOnes can help promote these opportunities to women, our business services need to simultaneously work with our businesses to make them inclusive and welcoming for women. As we promote non-traditional hiring practices through our business services representative, employers start to tap into this viable talent pipeline to fill jobs at various entry levels. Indiana can adapt resources and strategies the best practices identified by the National for Women's Equity in Apprenticeship and Employment.³
- **Formerly Incarcerated:** The occupations currently offered within the IDOC's Apprenticeship programs tend to be in industries where second chance employment is supported. Through both the Hoosier Initiative for Re-Entry HIRE and WorkOnes, ex-offenders can be actively connected to these opportunities, if they align with their interests. Because they combine on-the-job training with classroom instruction, a formerly incarcerated individual could learn academic and technical skills and earn a stable wage, with the option for regular pay increases during and after the program.
- **Historically underrepresented minorities:** Pre-apprenticeship and pre-employment programs can be especially valuable for people of color who have been historically underrepresented in certain industries and apprenticeships. These programs can be paired with Adult Education to help workers acquire a basic level of academic- and industry-relevant skills. Effective Pre-RAPs expose workers to job sites and work environments, as well as provide income support for workers to address barriers to employment. Pre-employment and pre-apprenticeship programs also create formal access points to employers. RAPs or WIOA Adult and Dislocated programs can help with direct expenses, such as childcare and transportation.
- **Urban and Rural Populations:** RAPs and SEALS can provide consistent wages, debt-free education, and higher wages to urban and rural Hoosiers. Workers who complete an apprenticeship earn an average starting salary of \$50,000 and earn about \$300,000 more than comparable workers over their lifetimes. Employers also benefit from having the

² U.S. Department of Labor, 2019. Overview of the Scaling Apprenticeship through Sector-Based Strategies Grant Program and Project Summaries.

³ The National Center for Women's Equity in Apprenticeship and Employment at Chicago Women in Trades (CWIT) provides strategies and practical applications to increase the number of women entering and being retained in registered apprenticeship through our online resources, technical assistance, and training.



ability to build a pipeline of skilled workers.⁴ Scaling access to State and federal apprenticeship programs will provide a way for urban students to earn postsecondary credentials and an income simultaneously. Pre- and/or youth-apprenticeship programs can aim to define clear career paths, help students (either in K-12 or adults) choose the best track for them, and prepare them to secure and succeed in full-time employment.

- **At-Risk Youth:** The use of pre-apprenticeship and bridge programs increases access and improves the odds of success for candidates who need job-readiness supports, such as at-risk youth. Pre-RAPs can introduce people to the workplace culture and expectations, developing employability skills as part of the education and training. Younger apprenticeship candidates may not be job-ready upon their graduation from high school, and they may not want to take the traditional four-year higher education route. Merging Pre-RAPs with the redesigned CTE programs of study could offer another option for high school students to earn a postsecondary credential and an income as they begin their career. Connecting Pre-RAPs to high school CTE courses while providing wraparound services such as career counseling and mentoring can help increase student success.⁵

Technical Assistance Tools and Program Alignment

The Office of Work-Based Learning and Apprenticeship is currently developing several technical assistance tools to aid in the alignment of State agencies, training providers, and program content. The main purpose of the **Post-Secondary Model Program Guidance** is to describe the most common career connected learning opportunities available to students. The guide provides common definitions for adult experiences and should help practitioners and employers better understand WBL. It provides standardized guidance for statewide programs as well as tips and resources for implementation.

While this guide includes many types of WBL, it focuses on comprehensive programs. These are training provider or employer-driven, “earn while you learn” programs that combine on-the-job training (OJT) with job-related instruction in curricula tied to the attainment of industry-recognized skills standards and certificates. Comprehensive programs are planned, structured learning experiences that combine classroom learning with paid work experience, and may be within the private for-profit sector, the non-profit sector, or the public sector. They include SEALs, Pre-RAPs, and RAPs.

The **Indiana Apprenticeship Continuum** is a technical tool that will house a series of templates to assist in building RAPs, Pre-RAPs, and certified SEALs. These templates will be used to enable intermediaries to build comprehensive WBL programs more easily through the use of already existing pathways aligned to U.S. DOL occupations, with options of adding customized training. Partnering with Ivy Tech Community College and the Indiana Commission for Higher Education will ensure alignment with CTE’s Next Level Programs of Study and Ivy Tech’s Certification Crosswalk, Certificates, Technical Certificates, and associate degrees.

This tool, once complete, will ensure alignment of post-secondary education programs to U.S. DOL occupational competencies and development of standardized articulation agreements and training plans for programs using training that can crosswalk or use dual credit or dual enrollment. Visually,

⁴ U.S. Department of Labor Apprenticeship Toolkit.

⁵ Jobs For the Future, 2019. Growing Equity and Diversity through Apprenticeship: Business Perspectives.



it will show pathways with multiple entry points that eventually lead to post-apprenticeship degrees. Not only will State agencies and intermediaries make use of this continuum, but employers can use a version of it for both recruitment and retention purposes.

3. Training Provider Eligibility Procedure.

Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

An Eligible Training Provider is an entity that provides a program of training services and has been determined to be eligible to receive Workforce Innovation and Opportunity Act (WIOA) Title I-B funding for training services through an Individual Training Account. These providers and programs will be included on Indiana's Eligible Training Provider List (ETPL). The provider must be open to the public and one of the following types of entities:

1. Institution of higher education that provides a program leading to a recognized postsecondary credential; or
2. Registered Apprenticeship Programs (RAPs); or
3. Other public or private providers of training services, which may include:
 - a. Community-based organizations;
 - b. Joint labor-management organizations; and
 - c. Eligible providers of adult education and literacy activities under Title II of WIOA if such activities are provided in combination with training services described at §680.350 of the WIOA regulations.

Indiana's ETPL is administered through the INTraining website. It is important to note the distinction between the INTraining website and the ETPL. The INTraining website is the means by which training providers submit applications to have their programs listed for Hoosiers to view and access. Once the providers submit the required program information to be determined eligible to be placed on the INTraining website, a more thorough review will be completed by DWD staff to determine whether the program is also eligible to receive WIOA funding, and, therefore, be placed on the ETPL. The ETPL is a subset of INTraining and includes the selected INTraining providers and programs which have been determined eligible to receive WIOA funding.

The INTraining dashboard is viewable by the public and maintains multiple features which assist clients in finding the training program most suited to their needs. Jobseekers have the ability to refine their search by utilizing a number of filters, including the ability to sort by programs funded "in certain areas" or "statewide." They may view all training programs in a particular region or sort by county. They may view only training programs that are offered 'on-line' or sort by 'off-line' (in person). If a jobseeker is in pursuit of a particular type of credential, he or she may seek and sort the training options that specifically lead to an industry recognized certification, licensure, a certified pre-apprenticeship certification a registered apprenticeship certification, or an accredited post-secondary credential.

The procedures, eligibility criteria, and information requirements for determining training provider initial and continued eligibility are outlined in DWD Policy 2020-16, Change 1 and its companion guidance, DWD Technical Assistance 2020-17, Change 1 (the policy's TA guide), both of which can be found at: <https://www.in.gov/dwd/compliance-policy/policy/active/>. DWD's policy was released in June of 2021, shortly after the release of TEGL 8-19, Change 1. The companion TA guide



serves as official State level guidance provided to complement DWD Policy 2020-16, Change 1, to provide robust procedural and process direction for training providers. In January 2023, DWD finalized improvements to DWD Policy 2020-16 to align with DOL-ETA recommendations that now include additional clarification on a provider's initial and ongoing eligibility requirements, explication on the unique approval process for Registered Apprenticeship Programs (RAPs) as WIOA Title I Eligible Training Providers (ETP), and to provide specific reasons for which DWD may terminate a training provider, provider location, or programs.

Below are key points from the policy and its companion TA guide:

Initial Application: The INTraining initial application process consists of two application types: Provider Location and Program.

Step One: Provider Location Application

Training providers must complete and submit a provider location application through the INTraining portal. A separate provider location application is required for each training location the entity wishes to seek approval.

The provider location application requires information about the provider and training location. Required information will include, but is not limited to:

1. Address for training location
2. Contact information for training location
3. Provider type
4. Accreditations and licenses, if applicable

Provider locations will be subject to clearance checks, which must be passed to receive approval. Pass/fail determination will be at the discretion of DWD. Clearance checks may include, but is not limited to:

1. Indiana Department of Revenue
2. Indiana Secretary of State
3. DWD Unemployment Insurance Tax
4. Office of the Indiana Attorney General E. Better Business Bureau

F. Any relevant accrediting bodies, which may include, but are not limited to:

1. Indiana Department of Health
2. Indiana State Board of Nursing
3. Office for Career and Technical Schools
4. Board for Proprietary Education
5. Indiana Professional Licensing Agency

Step Two: Program Application



Once the provider location application has been approved, the training provider must complete a program application for each training program it seeks to have included on the INTraining list.⁶ Programs must be offered to the general public to be eligible for consideration. Required information will include, but is not limited to:

1. Description of the program of training services
2. Information concerning whether the training provider is in a partnership with a business for the program of training services
3. Program related costs
4. Information addressing the alignment of training with in-demand industry sectors and occupations
5. Confirmation of compliance with 29 CFR Part 38, "Implementation of the Nondiscrimination and Equal Opportunity Provisions of the Workforce Innovation and Opportunity Act" Final Rule (January 3, 2017)⁷

If the training provider fails to complete either the provider location or program application or fails to provide any information being requested by DWD within sixty (60) days of submitting the application or of being notified of the omitted information, the provider location and/or program applications will be denied.⁸

Upon satisfactory submission and approval of a provider and program application, the program will appear on the INTraining website. At this time, the system will automatically review the program specifics to determine whether the program is eligible to receive WIOA Title I funding and therefore be included on the ETPL.

The Governor's Workforce Cabinet (GWC) in consultation with DWD reserves the right to review and reestablish the initial and continued eligibility requirements on an annual basis

In-demand Metrics

When determining a program's eligibility to receive WIOA funding, DWD will consider the demand of the occupations the program trains towards. Indiana uses a scoring formula to rate occupations for both short-term and long-term outlooks to determine if the occupation is an in-demand occupation in a particular region. The formula considers the following characteristics: total job openings, growth openings, percentage change, real-time online job postings, labor market information, and wages. The final score results in a rating of one (1) through five (5) for each occupation, one (1) being least in-demand and five (5) being highly in-demand. The Indiana Career Ready INDemand website can be found at www.indianacareerready.com.

Programs can qualify to be funded regionally or statewide.

⁶ A single program application may be associated with several provider (or training) locations. A new program application is needed for different program types or when commensurate programs have different details (i.e., course length, tuition, work experiences, etc.).

⁷ 29 CFR 38

⁸ For more information on denials, see Conditions of Denial section of policy docs. Initial ETPL Eligibility Under WIOA, DWD has set specific requirements a program must meet to be eligible to receive WIOA funding and be listed as an ETP. Initial eligibility consists of meeting two requirements: in-demand metrics and performance metrics.



1. Lead to an in-demand occupation in the region and⁹
 - a. Occupations are based upon the Classification of Instructional Programs (CIP) code to Standard Occupational Classification (SOC) crosswalk listed on the program application¹⁰
 - b. Identified occupations must meet the INDemand threshold—a 3 (or higher) flame ranking
 - c. INDemand data is updated annually on INTraining at the beginning of every program year (July 1st)¹¹
2. Lead to a post-secondary credential
 - a. Industry Recognized Certification
 - b. Licensure
 - c. Apprenticeship
 - d. Accredited Post-Secondary Program of Study
 - i. Accredited short-term certificate (< Associate degree)
 - ii. Associate degree
 - iii. Bachelor's degree
 - iv. Master's degree
 - v. Doctoral degree

In 2023, INTraining has included a fifth credential type, Pre-Apprenticeships, which are reviewed and certified by the Indiana Office of Work-based Learning and Apprenticeship (OWBLA). These credentials include industry-recognized certification training as well as allowing participants through a MOU with the employer to transition to a registered apprenticeship program upon completion.

The other requirement for initial and continued eligibility is **Performance Metrics**:

Performance Metrics

When determining a program's eligibility to receive WIOA funding, the State will consider the performance outcomes of the program. If a program does not have available data at the time of initial application, the program will receive a one-year data waiver. Programs can qualify to be regionally or statewide funded. Programs must meet the following minimum performance criteria:

1. Best of 2nd or 4th Quarter Completers Employment Rate greater than 30%; or
2. 50% or greater Credential Rate of all students served; or
3. Annual Total Completer's Median Earnings equal to or above \$10/hour.

If a program has been denied inclusion on the ETPL for failure to meet the required in-demand and/or performance criteria, the provider and program will remain on the INTraining list but will be removed from the ETPL. This renders them ineligible to receive WIOA funding and prompts the removal of the funding icon until both in-demand and performance criteria have been met.

⁹ For information on an in-demand determination review request, please go to the Review of Regional Demand or Industry Recognized Certification section of DWD Technical Assistance 2020-17, Change 1.

¹⁰ The CIP or SOC codes may be updated throughout the year as new codes are released by the National Center for Education Statistics (NCES) and the Bureau of Labor Statistics (BLS).

¹¹ The INDemand data will be updated each July utilizing April's bi-annual (every 2 years) report.



Indiana has set performance criteria to denote those programs that meet exceptional performance metrics. Programs must meet the following criteria to receive this designation:

1. Best of 2nd or 4th quarter completers employment rate greater than 60%; and
2. Credential rate of all students served greater than 80%; and
3. Annual total completer's median earnings equal to or above \$15/hour.

As DWD's Education and Training department monitors the continued eligibility of ETPL programs of study based on current performance criteria, DWD will be recommending elevating minimum program performance benchmarks to remain listed as an eligible training provider.

Continued Eligibility Requirements for INTraining and the ETPL

In accordance with WIOA, DWD has set specific requirements a training provider must meet or complete to maintain their eligibility on either list. Continued eligibility consists of meeting and completing four requirements: in-demand metrics, performance metrics, annual review, and federal performance reporting.

To maintain ETPL eligibility, in-demand metrics, and performance metrics, as listed in the Initial Eligibility for the ETPL section, must continue to be met.

In January 2023, DWD updated ETPL Policy 2020-16, Change 1 to include language that addresses access to training throughout the State which is physically and programmatically accessible for individuals who are employed or those with barriers to employment; reporting and accuracy of information on federal and State training programs, including performance and cost reports; and ensuring training program quality by requiring that programs lead to a recognized postsecondary credential.

Annual Review

To maintain INTraining or ETPL inclusion, all training providers must complete an annual review of each provider location and program to ensure that the WIOA Title I-financially assisted program is conducted in a nondiscriminatory way according to WIOA Section 188 and 29 CFR Part 38. The annual review due date is based upon the provider location or program application's initial approval date; therefore, training providers may have to complete an annual review multiple times if they have separate locations and/or programs that were approved at different times throughout the year.

An annual review includes the training provider reviewing and making any necessary updates on the provider location or program application. The training provider will receive a sixty (60) day notification prior to the annual review due date informing them of the deadline for submission of the review and any updates. Upon submission, the updated program information will be reviewed by DWD staff. If the training provider does not complete the annual review by its due date, the application will be placed into an "Information Requested" status. If the training provider fails to complete the annual review within sixty (60) days of the program being placed into "Information



Requested” status, the program application will be denied. The training provider may immediately re-apply.¹²

Performance Reporting (federal reporting)

To maintain INTraining or ETPL inclusion, all training providers must complete the annual federal performance reporting. Under WIOA, each State is required to submit student-level data for all training programs to U.S. Department of Labor on an annual basis. Student-level data should be reported at the beginning and end of each cohort and must be reported by the July 31st deadline for that reporting period. The following requirements apply to federal performance reporting:

1. Student-level data **must** be reported before or during the open federal performance reporting time period of **July 1st through July 31st**.
2. Training providers are required to submit student-level data to DWD via the INTraining portal annually.
3. Student-level data must be reported under the program location in which the student was enrolled.
4. Training providers must report student-level data for every program location that was in “Staff Approved” status at any time during the reporting program year.
 - a. **If the program did not serve any students, the training provider is still required to complete federal performance reporting.** The training provider will be able to indicate ‘no students were served’ during the reporting program year.
5. Student-level data must be submitted for all students, regardless of funding sources.
 - a. First name
 - b. Last name
 - c. Full social security number (or last four digits of the SSN)
 - d. Address (only if full SSN is not available)
 - e. Date of Birth
 - f. Gender
 - g. Race
 - h. Course Start Date
 - i. Course End Date
 - j. Enrollment Status
 - k. Name of Assessment(s) (if applicable)
 - l. Assessment(s) Pass/Fail (if applicable)
 - m. Deceased
 - n. Incarcerated

Any program that does not successfully complete their reporting of appropriate program year student-level data by the July 31st deadline, will be placed into a “**Pending Data**” status and **will not be fundable for a minimum of six (6) months**. The training provider will still be obligated to submit student-level data during the six (6) month unfunded time frame. During and following the “Pending Data” status, the following rules apply:

¹² For more information on denials, please go to Conditions of Denial section of DWD Technical Assistance 2020-17, Change 1



1. **Training provider completes student-level data reporting during the pending data timeframe**—the program will move to “Suspended” status for the remainder of the six (6) month time period and will remain unfunded. At the end of the suspension, a funding determination will be made.¹³
2. **Training provider does not complete student-level data reporting during the pending data time frame**—the program will be terminated for two (2) years. Please note: A new duplicate program application will not be accepted during the termination period. If a duplicate program is submitted, the new program will be denied.¹⁴

The companion TA guide addresses the exception to eligibility requirements for Registered Apprenticeships:

Requirement and Eligibility Exceptions

Apprenticeships

U.S. Department of Labor Registered Apprenticeship Programs (RAPs) are automatically eligible to be included on the ETPL and are exempt from federal, State, and local ETP eligibility and federal performance reporting requirements. The RAP will automatically be included on the ETPL once the program sponsor opts in and has provided the following information to DWD:

1. Occupations included within the RAP
2. The name and address of the RAP sponsor
3. The name and address of the Related Technical Instruction (RTI) provider, and the location of instruction if different than the program sponsor’s address
4. The method and length of instruction
5. The number of active apprentices

RAPs will remain on the ETPL until:

1. The RAP sponsor notifies DWD it no longer wants to be included on the list
2. The program becomes deregistered under the National Apprenticeship Act
3. The program is determined to have intentionally supplied inaccurate information
4. A determination is made that the RAP substantially violated any provision of Title I of WIOA or the WIOA regulations, including nondiscrimination and equal opportunity provisions of 29 CFR part 38

The companion TA guide also addresses general responsibilities of the Training Providers and addresses new monitoring processes that have been put into place, both to support accuracy and maintain quality training programs:

Provider Responsibilities

In addition to meeting and maintaining eligibility requirements, training providers are obligated to adhere to the following responsibilities:

1. Ensure instructor credentials meet the minimum qualifications:

¹³ For more information, please go to Initial and Continued Eligibility Requirements section of policy docs

¹⁴ For denial terms, please go to Conditions for Denial section of policy docs.



- a. Possess a two-year degree from an institution recognized by the United States Department of Education or national accrediting body in the major area they are assigned to teach; or
 - b. Possess practical experience of not less than two years in the major area they are assigned to teach and professional licensure or industry-recognized certification in the field.
 - c. All faculty applications to teach in the school must be accompanied by transcripts, letters, and documents supporting the application.
 - d. These requirements do not supersede any requirements set by another oversight agency that may be more stringent than that of INTraining.
2. In addition, and separate to the INTraining portal record, training providers must maintain a paper or digital record of all eligible participants using the following guidelines:
 - a. Must contain copies of any documentation that pertains to the participant's eligibility, including all attendance records and any earned credential documentation.
 - b. Must be kept in a secured area with limited access, as these files contain Personally Identifiable Information (PII).
 - c. Must be kept for a minimum of 3 years.
 - d. For additional resources on ADA requirements, please refer to the following documents: ADA Compliance Standards, ADA checklists, WIOA Equal Opportunity Regulations, and WIOA Equal Opportunity Reference Guide.
 3. Maintain at least one active email address that is regularly checked.
 4. Respond within five business days to all communications from DWD including phone calls, emails, online surveys, or requests for other documentation to assist the Department with ongoing program quality assurance measures.

Monitoring

Monitoring activities will include application and portal review, site-visits, and review of student records. DWD reserves the right to visit any training provider at any time on-site and unscheduled or request provider kept participant records for the purpose of program monitoring. Monitoring activities may include, but are not limited to:

1. Site visits (scheduled or unscheduled)
2. Staff or student interviews (scheduled visits only)
3. Classroom observation
4. Review of full participant records
5. Review of resources, tools, and curriculum
6. Review of program cost¹⁵
7. Review of instructor credentials
8. Review of ADA compliance

¹⁵ DWD reserves the right to request an itemized list of program costs outside of what is requested on the application. If the training provider submits a program cost increase, the training provider may be required to submit a justification



9. Review of any requirements related to the INTraining and ETPL policy¹⁶
10. Financial records
11. Review of EO compliance

DWD reserves the right to place INTraining providers and/or ETPs or programs on an improvement plan or to remove such training providers or programs from INTraining or the ETPL. Reasons for placement on an improvement plan or removal from INTraining or the ETPL may include, but are not limited to:

1. Poor performance
2. Misuse of funding
3. Loss of ETPL fundable status
4. Falsification of documentation
5. Observations or findings from monitoring activities, etc.

Indiana's ETPL policy addresses termination of training programs, and the Technical Assistance provides more details regarding DWD determinations of 'denied' and 'terminated':

DWD Determinations

Conditions for Denial

DWD reserves the right to deny a training provider, provider location, or program from INTraining or ETPL. Reasons may include, but are not limited to:

1. Failure to submit a completed application
2. Failure to submit requested information
3. Failure to complete annual review
4. Failure to meet in-demand metrics¹⁷
5. Failure to meet performance metrics
6. Failure to attain or retain required State licensure, certification, accreditation, or authorization to operate from the appropriate State oversight agency

If the training provider's location or program is denied and removed from the INTraining list for any of the above reasons, the training provider may re-apply once the issue has been resolved. If the training provider location is only denied from the ETPL for any of the above reasons, the provider or program application will automatically be re-evaluated as new information is received. A denial is not appealable.

If a training provider location or program is denied and removed from the ETPL while WIOA participants are enrolled and have already begun their training, the participants may complete the program unless the provider or program has lost State licensure, certification, accreditation, or authorization to operate from the appropriate State oversight agency. If the provider has lost its

¹⁶ INTraining and Eligible Training Provider List (ETPL) Eligibility and Establishment Under the Workforce Innovation and Opportunity Act (WIOA) Title I

¹⁷ For information on a review request, please go to section Review of Regional Demand or Industry Recognized Certification.



authority to operate, DWD will make every effort to find alternative, comparable training for the participant.

Conditions for Termination

DWD reserves the right to terminate a training provider, provider location, or program from INTraining or ETPL. Reasons may include, but are not limited to:

1. Failing to complete student-level data reporting requirements
2. Intentionally supplying inaccurate information
3. Misrepresenting costs or services
4. Substantially violating WIOA statutes or regulations
5. Barred by the federal government from receiving federal funds

If the training provider location or program is terminated for any of these reasons, the provider must wait at least two (2) years before re-applying. The training provider is liable to repay all WIOA adult and dislocated worker training funds received during the period of non-compliance. A termination is appealable.¹⁸

The new policy and companion TA guide address a new and multi-tiered appeal process available to training providers who wish to challenge a termination:

Review of Termination

Training providers may request a review by DWD for any provider location or program that has been terminated. A training provider may request up to three reviews by DWD: administrative review, appeal of administrative decision, and objection to the Department Review Committee's decision.

Administrative Review

The request for an administrative review of termination from INTraining or the ETPL must be submitted electronically to INTraining@dwd.in.gov within ten business days of the date of notice of its termination. The request for review must include the following:

1. Name of training provider
2. Program location ID, if applicable
3. Justification for review
4. Any documentation to support the provider's justification

The DWD Associate Chief of Workforce Education and Training will select an Administrative Review Committee comprised of three DWD staff members who were not involved in the initial decision. This committee will conduct a review and send notice of its decision to the parties within thirty (30) business days of receiving the request for an administrative review.

Appeal of Administrative Review Decision

An appeal of the administrative review decision must be submitted electronically to INTraining@dwd.in.gov within fifteen business days of the date of the Notice of Administrative

¹⁸ For more information on appeals, please go to section Review of Termination



Review decision. The request for an appeal of the administrative decision must include the following:

1. Name of training provider
2. Program location ID, if applicable
3. Copy of Administrative Review Decision
4. Justification for appeal
5. Any documentation to support the appeal's justification

A Department Review Committee, designated by the DWD Commissioner, which has not been involved in the initial or the Administrative Review decision and is not Workforce Division team members, shall facilitate the appeal process. The Department Review Committee will schedule an administrative hearing not more than sixty business days after DWD receives the written request for appeal.¹⁹ All appeal hearings will be held de novo, and the Workforce Education and Training Department will bear the burden of proof. Indiana Rules of Trial Procedure will govern the administrative proceedings. The Department Review Committee will issue a decision within ninety business days of the completion of the hearing.

Objection of the Department Review Committee's Decision

Not more than 15 days after the issuance of a written decision by the Department Review Committee, any party adversely affected by the order may file an objection to the decision in writing to the DWD Commissioner and request that the Commissioner review the decision. The party must identify the basis of the objection with reasonable particularity. No later than thirty after the objection is filed with the Commissioner, the Commissioner shall issue a final decision affirming, modifying, or dissolving the Department Review Committee's decision. The Commissioner may remand the matter, with or without instructions, to the Department Review Committee for further proceedings. The Commissioner is the ultimate authority (as defined by IC 4-21.5-1-15) for DWD.

A party may contest the decision of the ultimate authority by filing a petition for judicial review consistent with the requirements of I.C. 4-21.5- 5 et seq.

4. Describe how the State will implement and monitor for the Adult Priority of Service requirement in WIOA section 134 (c)(3)(E) that requires American Job Center staff, when using WIOA Adult program funds to provide individualized career services and training services, to give priority of service to recipients of public assistance, low-income individuals, and individuals who are basic skills deficient (including English language learners).

DWD collaborated with U.S. Department of Labor to revise and publish updated Adult Priority of Service guidance in 2023. (See Policy 2019-04, Change 2 at <https://www.in.gov/dwd/compliance-policy/policy/active/>). Additionally, local areas must have written policies that delineate how they will give priority of service and must adhere to these policies. DWD will review data and local policies to ensure priority is being carried out appropriately and will provide technical assistance as needed. DWD is continuing to evaluate local level benchmarks and will review data and local

¹⁹ Only appeal requests received by DWD within fifteen (15) business days of the date of notice of the Administrative Review Decision shall be scheduled for an administrative hearing. All other requests will be denied.



policies to ensure priority is being carried out appropriately. Technical assistance will be provided as needed.

5. Describe the State's criteria regarding local area transfer of funds between the adult and dislocated worker programs.

In its 2023 Formula Allocation Memo, DWD reaffirmed that it allows local workforce development board (LWDBs) to transfer up to 100% of the Adult and Dislocated Worker allocations, provided local entities seek approval as noted in current WIOA allocation memo available at <https://www.in.gov/dwd/compliance-policy/policy/active/>.

6. Describe the State's policy on WIOA and TAA co-enrollment and whether and how often this policy is disseminated to the local workforce development boards and required one-stop partners Trade Act Sec. 239(f), Sec. 235, 20 CFR 618.325, 20 CFR 618.824(a)(3)(i).

The State issued DWD Policy 2020-06, Change 1 in March 2022 to emphasize the requirement of co-enrollment of TAA individuals into WIOA Dislocated Worker as mandated by the Trade Act sections above. The policy was distributed to local workforce development boards, posted on the DWD Policy website, and provided to the DWD Regional Support Managers for implementation by the local workforce development boards. Additionally, the TAA Unit provides a report of co-enrollment data specific to each region, quarterly.

7. Describe the State's formal strategy to ensure that WIOA and TAA co-enrolled participants receive necessary funded benefits and services. Trade Act Sec. 239(f), Sec. 235, 20 CFR 618.816(c)

Through the quarterly co-enrollment report issued by the TAA Unit, local workforce development boards are provided individual participant details of those TAA participants who are not co-enrolled into WIOA DW services. The TAA Unit schedules strategy meetings for any local area that is not meeting co-enrollment expectations upon issuance of each quarterly report. Additionally, the TAA Unit provides co-enrollment statistics to DWD Compliance team for implementation into WIOA monitoring.

8. Describe the State's process for familiarizing one-stop staff with the TAA program. 20 CFR 618.804(j), 20 CFR 618.305

The TAA program is administered by dedicated TAA staff in the local offices. The TAA Unit provides in-depth training to all new hires and annual refresher training provided to all other TAA case management staff. Additionally, the TAA Unit partners with Rapid Response to provide an annual roundtable to bring together Business Services teams regarding the coordination of TAA and Rapid Response activities. The TAA Unit offers additional TAA training to any local area non-TAA dedicated staff upon regional request.

(c) Youth Program Requirements: With respect to youth workforce investment activities authorized in section 129 of WIOA, States should describe their strategies that support the implementation of youth activities under WIOA. States must:

1. Identify the State-developed criteria to be used by local boards in awarding grants or contracts for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA. Further, include a description of how the State assists local



areas in determining whether to contract for services or to provide some or all of the program elements directly.

The Indiana Department of Workforce Development (DWD) and local workforce development boards (LWDBs) recognize and adhere to 20 CFR § 681.400 to allow grant recipients/fiscal agents the option to directly provide some, or all, of the required youth workforce investment activities. When not directly providing services, the LWDB will award grants or contracts on a competitive basis to providers of youth workforce activities, while taking into consideration the ability of providers to meet performance accountability measures based on the primary indicators of performance for the WIOA Youth program, as described in the WIOA Section 116(b)(2)(A)(ii). The LWDB must also conduct oversight with respect to such providers.

The State-developed criteria for local boards to consider when procuring youth providers are the following:

- Ability to deliver services to the targeted population in accordance with locally established guidelines;
- Experience in working with youth in similar programs and activities;
- Past and current collaboration with other service providers;
- Past performance record, including both programmatic and fiscal integrity;
- Understanding of and commitment to meeting goals and objectives; and
- Demonstration of understanding of and commitment to continuous improvement methods.

As local boards make decisions about youth provider procurement and to award contracts and grants to providers, they must also:

- Identify youth service providers based on criteria established in the State Plan;
- Take into consideration the ability of the provider to meet performance accountability measures;
- Award such grants or contracts on a competitive basis and in accordance with the Procurement Stands found at Uniform Guidance at 2 CFR parts 200 and 2900; and
- If the service provider (entity) selected fulfills another role in the local area, the LWDB must comply with applicable conflict of interest, separation of duties, and firewalls requirements in relation to WIOA's single entity/multiple role parameters.

LWDBs must identify eligible providers of youth workforce investment activities in the local workforce development area by awarding grants or contracts on a competitive basis, based on the recommendation of the youth standing committee, if the local board chooses to establish a standing youth committee under 20 CFR Section 681.100; if no such youth committee exists, the LWDB then must assign a committee that function. Where the LWDB elects to award contracts but determines there is an insufficient number of eligible providers of youth workforce investment activities in the local area, (such as a rural area), the LWDB may award grants or contracts on a sole source basis. The LWDB committee must take into consideration the ability of providers to meet performance accountability measures based on the primary indicators of performance for the WIOA Youth program.

Procurement of youth service providers must be in accordance with the Uniform Guidance at 2 CFR Parts 200 and 2900, in addition to applicable State and local procurement laws. Grantees and sub



grantees must establish, maintain, and follow written procurement standards and procedures that are in compliance with all applicable federal, State, and local laws and regulations.

Currently, local areas are able to set their own parameters for procurement of youth services, thus not all areas describe or request specific performance plans related to primary performance indicators in their Request for Proposal. However, some local areas list metrics of success to ensure providers meet or exceed goals, including pay for performance goals. Awards are then made to organizations possessing the demonstrated ability to perform.

- As determined by U.S. Department of Labor and DWD, performance goals include:
 - Placement in employment, education, or training;
 - Employment, education, or training retention;
 - Median earnings;
 - Credential rate;
 - Attainment of degree or certificate; or
 - Measurable skills gains
 - Valid satisfactory record of past performance in delivering the proposed or similar services, including demonstrated quality of services and successful outcome rates from past programs (including non-WIA/WIOA programming)
 - Ability to provide services that can lead to the achievement of competency standards for customers with identified barriers or deficiencies.

For youth service provision, performance analysis will continue to focus on performance of required WIOA youth service performance and performance as outlined in JAG services.

Guidance related to youth service provision procurement will adhere to 20 CFR 681.400.

2. Explain how the State assists local workforce boards in achieving equitable results for out-of-school and in-school youth. Describe promising practices or partnership models that local areas are implementing and the state's role in supporting and scaling those models within the state for both in-school and out-of-school youth.

The purpose of WIOA youth services is to assist youth, (ages 14-21 if in-school youth; ages 16- 24 if out-of-school youth), who face significant barriers to education and/or employment by providing resources and support to overcome those barriers and successfully transition to self-sufficient adulthood. This is accomplished by first assessing a participant's skills, interests, needs, and goals, creating customized service plans in collaboration with the participant, and expanding the participant's connection to educational opportunities, the local economy, and community services. All youth metrics are linked together, there are no specific metrics for out-of-school youth. All the strategies below are designed to increase participation of and outcome achievement of Indiana's out-of-school youth population.

For out-of-school youth, WIOA services can be the primary connection point for these individuals with both the workforce development and social services systems. By leveraging WIOA Youth services for these Hoosiers, they can attain success in gaining access to occupational opportunities within the local economy.



In addition to broad state efforts, like the use of the Jobs for America's Graduates program as our statewide in-school program, DWD takes an approach emphasizing local partnerships built around the 14 Youth Program Elements. Some in-school and out-of-school examples are described below.

1. Tutoring, study skills training, and dropout prevention strategies:
 - a. Local programs may utilize their own strategies for individual tutoring or study skills training as appropriate and necessary. For example, Indiana's Rose-Hulman Institute of Technology operates the AskRose a homework help hotline for students statewide, a resource which is publicized and may be utilized by local areas
 - b. Additionally, Indiana's Adult Education system serves as the catalyst for academic remediation services and or preparation for the high school equivalency test for most of Indiana's out-of-school youth population.
2. Alternative secondary school services, or dropout recovery services as appropriate:
 - a. Additionally, as previously noted, all local areas partner with their adult education providers, operated by the Indiana Department of Workforce Development for dropout recovery/ high school equivalency classes for youth participants. In local areas where other adult education providers exist, such as Goodwill's Excel Center (a re-engagement center), youth are enrolled, as appropriate.
3. Paid and unpaid work experiences, including summer employment and other opportunities throughout the year, pre-apprenticeship programs, internships, job shadowing, and on-the-job training opportunities:
 - a. Indiana's local areas offer numerous work experiences (including summer employment, job shadowing, internships, and on-the-job training) at local employers for out-of-school youth. These work experiences range in length but are typically short-term and can last up to twelve weeks. Many work experiences include a "boot camp" or employability skills training prior to the start, as well as milestone trainings regarding the jobsite, industry, or individual's onsite performance. All work experiences include some form of academic and occupational education aligned with their placement and/or career pathway.
 - b. As a promising practice, many local areas also provide training to employers and supervisors before and during the onsite work experience. Topics range from understanding youth culture, youth barriers, and activities designed to import strategies to make the experience successful for both parties.
4. Occupational skills training:
 - a. Indiana offers multiple access points for out-of-school youth participants to seek occupational skills training that will result in an industry-recognized credential. These could include a specific training program selected by the youth based on their career interest and aptitude results and/or the State's sponsored short-term, in-demand industry training occupations accessed through Next Level Jobs and AE Integrated Education and Training (IET) program.
 - b. Additionally, the State also includes apprenticeship programs, JobCorps, and YouthBuild in this program element
5. Education offered concurrently with and in the same context as workforce preparation activities:
 - a. Local areas offer this program element, as appropriate, for youth who are enrolled in a postsecondary education opportunity (including those in credential programs)



- and may need a short-term work experience or employability skills training, such as those found in the Jobs for America's Graduates program models. This also includes local "boot-camp" programs offered prior to short-term work experience, on-the-job training, internships, or Adult Education's IET
- b. The JAG program specifically identifies thirty-seven core employability skills to align with workforce preparation activities
6. Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors:
- a. Local areas offer this program element, as appropriate, through local partnerships with colleges and other leadership training programs or providers. Some such examples include the Boys and Girls Club, Junior Achievement, Shafer Leadership Academy, the Indiana National Guard, and more. One such LWDB has provided sub-contracts to the Boys and Girls Club and YMCA in their area to both fulfill this program element, but they are also service providers for other WIOA elements as well
7. Supportive Services:
- a. Local areas offer this program element, as appropriate, to assist OSY meet goals developed through the objective assessment, through the following examples of assistance:
 - i. Clothing assistance (potentially used for interviews, work experience, job placement, etc.) which could be in the form of a gift card to purchase work appropriate clothing or through a local partnership with a community-based organization such as Dress for Success,
 - ii. Transportation assistance (potentially used to participate in work experience, interviews, education or job placement, etc.), which could be in the form of gift cards for gas or through a local partnership with a community-based ride-share/transportation provider,
 - iii. Child and dependent care assistance (WIOA sponsored providers should be connected to CCDF or On-My-Way, when feasible based on available community supports),
 - iv. Referrals to medical services such as individual and/or group mental health counseling, or drug/alcohol counseling services when needed; typically created at the local level,
 - v. Assistance with training materials such as books and equipment, which could be in the form of direct support to a bookstore or community college bursars' office, and
 - vi. Incentives for completion of participant goals
8. Adult mentoring:
- a. Local areas offer this program element, as appropriate, through connections with partner organizations like the Boys and Girls Club, Starfish Initiative, local postsecondary college and university students, or other organizations that specialize in mentoring teens and young adults. DWD works at a statewide level with the Indiana Youth Institute to connect LWDB's with high-quality mentor programs in their area; additional use of IYI's mentoring resources in the form of professional development and program creation are utilized when needed/available



9. Comprehensive guidance and counseling:
 - a. Often, this program element is provided by the on-site youth case manager, especially for career and education counseling.
 - b. However, if a youth, including an out-of-school youth, has a specific need for specialized counseling, local areas refer participants to drug and alcohol treatment facilities, mental health counselors and other organizations when appropriate.
 - c. DWD works in collaboration with the Department of Mental Health and Addiction's youth focused team to provide training and share resources when available/appropriate for the out-of-school youth population
10. Financial literacy education:
 - a. Local areas have developed partnerships with individual financial institutions and local banks to provide financial literacy training to participants, including out-of-school youth. These include, but are not limited to, InvestEd, Regions Bank, Old National Bank, PNC Bank, and more.
 - b. Local areas also utilize online curriculum and tools to provide digital financial literacy education; examples include materials through EverFi, Allison.com, Consumer Financial Protection Bureau and FDIC Youth Guide to Financial Literacy
11. Entrepreneurial skills training:
 - a. Local areas have established partnerships with their Small Business Administrations, Small Business Development Centers, State and local Chambers of Commerce, Ivy Tech's Cook Center for Entrepreneurship, and Junior Achievement as sources of curriculum, guest speakers, and mentors to youth participants, including out-of-school youth.
 - b. Several local service providers have developed curriculum for this program element that focuses on the awareness and understanding of entrepreneurship and the steps to create a detailed business plan.
 - c. For in-school youth, this program element is included in training and a competitive event for JAG students at the regional and State Career Development Conference, where students create a business plan and pitch deck
12. Services that provide labor market and employment information:
 - a. Indiana operates a statewide career interest and work values website, Indiana Career Explorer, which provides all youth, including out-of-school youth, participants access to labor market information related to career pathways and Indiana specific in-demand occupations that align with their interests.
 - b. Local areas have the ability to provide additional information and resources for this program element as appropriate
13. Activities that help youth prepare for and transition to post-secondary education and training:
 - a. Local areas employ numerous tactics that are regionally specific. They include, but are not limited to, college fairs and visits, Financial Aid application nights, or college bridge programs.
 - b. Statewide partnerships with organizations such as the Commission for Higher Education and InvestEd help inform youth, their case managers, parents, and mentors understand and navigate the financial aid and State scholarship application processes (such as 21st Century Scholars and Frank O'Bannon Scholarship).



- c. The Indianapolis-based YES (Youth Employability Skills) program is a statewide promising practice designed to recruit out-of-school youth through open hours at the Boys and Girls Club; youth are then matched with a REF (re-employment facilitator) to assess career interests, academic and employment goals, and then process through a mind-setting boot camp, with goals focused on student attainment of their high school equivalency diploma and/or entrance into training or employment
14. Follow-up services for not less than 12 months after the completion of participation:
- a. Indiana requires follow-up services for all participants to occur at least once every 90 days after exit. In addition, Jobs for America's Graduates participants are contacted, at minimum once a month after exit, with student-specific goals to track the follow-up contact and services provided during the contact.
 - b. The types and duration of services provided may vary based on the needs of the individual, but may include leadership development and supportive services; regular contact with a youth's employer including assistance in addressing work-related problems; assistance in securing better paying jobs, career pathway development and further education or training; work-related peer support groups; adult mentoring; or services necessary to ensure success in post-secondary training.

The State's major partner for recruiting out-of-school youth and assisting them in achieving their goals is a partnership with Title II Adult Education programs. In the past two years, youth between the ages of 16-24 make up nearly 33% of the State's Adult Education enrollments, nearly all are drop-outs working on achieving their high school equivalency diploma. This partnership increases participation (enrollment and attendance) in both programs, as well as assisting in educating the out-of-school youth for preparation in career pathways and bridge short-term training programs with direct linkages to post-training employment.

At the State level, an ongoing partnership between Adult Education and youth department leadership has continued since 2014, where staff meet jointly on a bi-monthly basis or as needed, participate in monthly and annual training events, including the monthly Adult Education webinars, and annual Young Adult Services Summit, which provides professional development opportunities for out-of-school youth case managers. Local WorkOne staff participate in Adult Education program participant onboarding or welcome meetings and vice versa to ensure all participants are aware of the array of services available to them in both programs. Adult Education partners serve on local standing youth committees and the statewide Youth Committee under the Governor's Workforce Cabinet.

In addition to partnership with Title II Adult Education programs, recruiting and referral to Vocational Rehabilitation has been a statewide focus since the implementation of WIOA. This partnership allows out-of-school youth with significant barriers to employment to access funding for both intensive and basic services to assist them in their pursuits. Joint statewide training, local staff meetings, and specific referral forms/personal hand-offs are just some of the strategies VR and the statewide WorkOne system have implemented to ensure out-of-school youth participant access to programming. VR partners serve on local youth standing committees and on the statewide Youth Committee under the Governor's Workforce Cabinet. VR is also a major partner in the provision of in-school youth services through a partnership with our JAG program and their Pre-Employment



Transition Services (Pre-ETS); school-based VR youth counselors refer students with IEP's and 504 Plans to JAG classes as available in their local schools; JAG Specialists then enroll them and provide JAG curriculum and services in alignment with the five (5) Pre-ETS required services.

Additional partnerships with the statewide community college system, foster care system and their service providers, Indiana Commission for Higher Education, Division of Mental Health and Addiction, Indiana Department of Child Services, Indiana Department of Education, and Indiana Department of Correction assist in helping local areas recruit potentially eligible out-of-school youth or provide them access to education or training funding and resources to assist them in completing goals related to education, training, and employment. State leadership serve on a variety of cross-agency committees and taskforces focused on bridging the gaps between agency programs designed to serve the State's most vulnerable youth populations, including youth in foster care, juvenile offenders, homeless youth, those with mental health issues, and/or economically disadvantaged.

3. Describe how the State assists local workforce boards in implementing innovative models for delivering youth workforce investment activities, including effective ways local workforce boards can make available the 14 program elements described in WIOA section 129(c)(2); and explain how local areas can ensure work experience, including quality pre-apprenticeship and registered apprenticeship, is prioritized as a key element within a broader career pathways strategy.

In 2015, Indiana issued an interim WIOA Youth Manual, which was subsequently finalized in 2016 and has been updated every year since implementation. The purpose of this manual is to provide consistent guidance, strategies, promising practices, and documents that can be used by local areas to implement WIOA youth services, both in- and out-of-school. The document includes many of the same strategies included in response to Question (c)(2) above, but also details the process staff should use to recruit, determine eligibility, conduct an objective assessment, and maintain case files for each youth enrollment. Additionally, the DWD has issued policy (DWD Policy 2017-03, Change 2, DWD Policy 2017-10, Change 1, and DWD Policy 2018-01, Change 2 found at:

<https://www.in.gov/dwd/compliance-policy/policy/active/>) surrounding requirements and effective practices for WIOA youth in the following areas:

- Eligibility Determinations, complete with definitions
- Work Experience program element, complete with definitions, guidance on fund expenditures and working with employer partners
- 14 Youth Program Elements, complete with definitions, requirements, and prohibitions; an updated version of this policy was issued in October 2021 to provide clarification on the provision of electronic devices as WIOA Youth Program supportive services and/or as an incentive.

The JAG National model, used as the primary vehicle to serve in-school youth, has multiple guidance and requirement handbooks which are guideposts for Indiana's implementation of this program, many of which were updated in 2021 in collaboration with JAG Indiana leadership serving on numerous workgroups to review and revise national standard operating procedures. All the above guidance and policy documents assist local areas to define and meet expectations of both youth constituents and requirements to ensure the effective implementation of the 14 program elements.



In addition to written guidance, DWD hosts multiple annual professional development events for both in- and out-of-school case managers and administrators to utilize current promising practices and introduce beneficial partnerships to ensure the effective implementation of the 14 program elements. DWD's youth team has a dedicated professional development staff member, providing ongoing training and technical assistance. JAG staff at the State and local levels also participate in numerous national conferences featuring the most current and promising practices in the areas of serving youth, especially those with barriers to education and employment success.

With respect to pre-apprenticeships and registered apprenticeships, State, and local youth staff partner with DWD's Office of Work-based Learning and Apprenticeship to ensure program participants are aware of the numerous opportunities in this space, including State Earn and Learn stackable certifications, as they are typically hosted in schools.

4. Provide the language contained in the State policy for “requiring additional assistance to enter or complete an educational program, or to secure and hold employment” criterion for out-of-school youth specific in WIOA section 129(a)(1)(B)(iii)(VIII) and for “requiring additional assistance to complete an education program, or to secure and hold employment” criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VIII). If the state does not have a policy, describe how the state will ensure that local areas will have a policy for these criteria.

DWD Policy 2017-03, Change 2: Youth Eligibility states that “requires additional assistance to enter or complete an education program, or to secure and hold employment” for in- or out-of- school youth must be locally defined and does not include specific language for these definitions. WIOA allows States and/or local areas to define the requiring additional assistance criterion that is part of the Out-of-School Youth and In-School Youth eligibility. It clarifies that if this criterion is not defined at the State level and a local area uses this criterion in their Out-of-School Youth or In-School Youth eligibility, the local area must define this criterion in their local plan. Additionally, DWD and GWC will be issuing Local Planning guidance, which will include assurance from each local area (either within Local Plans or local policy) that these criteria are addressed. Review of local plans and regular monitoring and oversight of policies and procedures will also support compliance with this element.

Some examples of local definitions are below:

Region 5 Examples:

- In-school Youth
 - A Youth living in a household where a parent is incarcerated, has a criminal record, or has no high school education; or
 - A Youth has experienced recent traumatic events, is a victim of abuse, or resides in an abusive environment, or suffers from serious emotional or medical problems; or
 - A Youth who is in a household where a parent or spouse has been terminated or laid off in the past 6 months; or
 - A Youth who has been referred to or treated by an agency for substance abuse/psychological problems; or
 - A Youth who is an expectant father; or
 - A Youth who has experienced the loss of a primary caregiver (parent or guardian) due to debilitating health issues, death, or military service; or



- A Youth who lacks transportation to school or work and/or does not have access to technology; or
- A Youth who is at risk of dropping out of high school due to failing a core subject/behind in credits/poor attendance/not passing proficiency exam or has had an out of school suspension or expulsion from school.
- Out-of-school Youth
 - A Youth who is unemployed and has been unable to obtain employment within the six weeks prior to program application; or is underemployed defined as part-time (less than 30 hours a week) and/or minimum wage; or
 - A Youth who has never worked or who has never held a full-time job (30+ hours a week) for more than 13 consecutive weeks; or
 - A Youth who has neither the work experience nor the credential required for an occupation in demand for which training is necessary and will be provided; or
 - A Youth who has dropped out of a post-secondary educational program during the last twelve calendar months prior to program application; or
 - A Youth who has been fired from a job within the 12 months prior to program application; or
 - A Youth living in a household where a parent is incarcerated, or-has a criminal record or has no high school education; or
 - A Youth has experienced recent traumatic events, is a victim of abuse, or resides in an abusive environment, or suffers from serious emotional or medical problems; or
 - A Youth who is in a household where a parent or spouse has been terminated or laid off in the past 6 months; or
 - A Youth who has been referred to or treated by an agency for substance abuse/psychological problems; or
 - A Youth who is an expectant father; or
 - A Youth who has experienced the loss of a primary caregiver (parent or guardian) due to debilitating health issues, death, or military service; or
 - A Youth who lacks transportation to school or work and/or does not have access to technology.

Region 7 Examples:

- In-school and out-of-school Youth
 - Limited or no work experience;
 - One or more parents have been incarcerated in the last twelve months;
 - One or more parents dropped out of school;
 - Mother or father is not employed;
 - No one in the household is currently employed;
 - Lacks transportation to and from work or school; or
 - Lacks marketable skills that are in demand in the local labor market.

Region 8 Examples:

An individual who requires additional assistance to enter or complete an educational program or to secure or hold employment. Additional assistance is defined in Regional Policy 06-002 Eligibility as **one or more** of the following:



- Currently receives free lunch.
- Poor work history- having NOT worked full-time (32 hours per week or more) in unsubsidized employment for the same employer for 13 consecutive weeks in the past 12 calendar months. This information is collected on the enrollment application under the section "Limited Work History/Experience." This can be verified using the signed application along with a detailed case note.
- Unemployed or underemployed- the individual is not earning a self-sufficient wage (Earning \$18.00 per hour and working less than 35 hours per week or an equivalent income).
- Not receiving regular child support- the youth resides in a household where the non-custodial parent has not paid child support on a timely basis as established by the support order.

Region 9 Examples:

- In-school Youth
 - Has poor attendance patterns in an educational program during the last 12 calendar months; or
 - Has been expelled from school within the last 12 calendar months; or
 - Has been suspended from school at least within the last 12 calendar months; or
 - Has below average grades; or a GPA at or below 2.5; or
 - A member of a household with a parent/guardian that has a criminal record; or
 - Living in a household where a parent has no High School Diploma or its equivalent; or
 - Has poor work history, to include no work history, or has been fired from a job in the last 6 calendar months.
- Out-of-school Youth
 - Has dropped out of a post-secondary educational program during the past 12 calendar months; or
 - Has poor work history, no work history, or has been fired from a job in the last 6 calendar months; or
 - A member of a household with a parent/guardian that has a criminal record; or
 - Living in a household where a parent has no High School Diploma or its equivalent; or
 - Has poor work history, no work history, or has been fired from a job in the last 6 calendar months.
 - Not receiving regular child support-youth resides in a household where the non-custodial parent has not paid child support on a timely basis as established by the support holder.

Region 11 Examples:

- A minor child currently residing in a household in which one or both legal parents are not currently residing. Documented by self-attestation.
- Any child who does not have at least one parent who holds a post-secondary degree. Documented by self-attestation.



- Any child who receives free or reduced lunches. Documented by letter from customer's school corporation.
- Any youth who has received or currently receives treatment for substance abuse, or currently resides in the household with a parent or legal guardian who has a documented history of substance abuse. Documented by verification from treatment/recovery program or police/court papers.
- Any child who lives or currently resides in a domestic violence household. Documented by certified counselor, social worker, school social worker or authorized employee of a domestic violence program or other reputable institution such as the customer's school or religious organization.
- Any child who has a parent who is considered an offender. Documented by probation, parole office, police records, or authorized employee of an offender recovery program.
- Any child currently participating in special education services or has participated in special education while in school. Documented by papers from school system, vocational rehabilitation, or authorized rehabilitation /educational agency.
- Any child receiving SNAP (Food Stamps) or TANF. Documented by Department of Family and Children.
- Child in the household of the custodial parent is not receiving regular child support. This information should be documented by court records, records, from the local prosecutor's office, records from FSSA (Family Social Services Administration) or a related entity.
- Youth involved with the juvenile justice system. This information should be documented with court records, statement from the probation officer, or documentation from another juvenile justice agency.
- Youth who declares a mental or physical disability. This information must be verified by school records, a physician's statement, a statement from a mental health provider or another qualified referring agency such as Vocational Rehabilitation.
- Youth who has aged out of foster care. This information must be verified by records from the Division of Child Services.
- Youth who do not have a driver's license, or does not access to a vehicle, or relies on public transportation, or no family support to provide transportation.

1. Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3))

N/A

2. The entity responsible for the disbursement of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15))

N/A

3. A description of the type and availability of WIOA title I Youth activities and successful models, including for youth with disabilities. (WIOA section 108(b)(9).)

N/A

4. A description of the roles and resource contributions of the one-stop partners.

N/A

5. The competitive process used to award the subgrants and contracts for title I activities.



N/A

6. How training services outlined in section 134 will be provided through individual training accounts and/or through contracts, and how such training approaches will be coordinated. Describe how the State will meet informed customer choice requirements regardless of training approach.

N/A

7. How the State Board, in fulfilling Local Board functions, will coordinate Title I activities with those activities under Title II. Describe how the State Board will carry out the review of local applications submitted under title II consistent with WIOA sections 107(d)(11)(A) and (B)(i) and WIOA section 232.

N/A

8. Copies of executed cooperative agreements which define how all local service providers will carry out the requirements for integration of and access to the entire set of services available in the one-stop delivery system, including cooperative agreements with entities administering Rehabilitation Act programs and services.

N/A

(e) Waiver Requests (optional): States wanting to request waivers as part of their Title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested.

1. Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan

GWC WAIVER

For PY 24-25, The State of Indiana is requesting a waiver from Section 101(b)(1) and (c) and the corresponding regulations at 20 CFR 679.110(b)-(c), which requires how the State Workforce Development Board (SWDB) is to be structured.

The State of Indiana requests that the waiver for the membership of the Indiana Governor's Workforce Cabinet (i.e., SWDB), be granted for a two-year period. This waiver will grant Indiana the flexibility to continue to the alignment of our State and Federal workforce systems. Since 2018, Indiana has been granted this waiver which has allowed the State to achieve greater connectivity among workforce partners, thus creating coordinated strategies among required WIOA partners and non-required partners.

The State of Indiana recognizes that the membership of the SWDB must meet the requirements of WIOA sec 101(b) and must represent diverse geographic areas of the State, however the structure of the Governor's Workforce Cabinet has positioned Indiana competitively to attract good jobs and serve as a workforce leader in the Midwest. It is through the current structure of the SWDB that Indiana was able to successfully be awarded the designation of a tech hub and hydrogen hub, in alignment with federal workforce investments relative to the CHIPS and Science Act, Bipartisan Infrastructure Law, and more. Members of the SWDB are strongly positioned to strategize, leverage resources, and deliver coordinated workforce solutions to Hoosier individuals and employers across



the State. The 2024-2027 Unified State WIOA Plan includes goals and strategies that will make good on our promise to spearhead workforce investments and initiatives in the Midwest and nationally.

At the local level, this waiver for the Cabinet structure allows us to set a common vision, strategy, and implementation plan with local workforce development boards, empowering them to act upon these elements in their local workforce development area

2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers

There are no State or local statutory or regulatory barriers to implementing the proposed waiver.

The Indiana General Assembly passed, and Governor Holcomb signed Senate Enrolled Act 50 in 2018, Indiana Code 4-3-27. The bill created the Governor's Workforce Cabinet to comply with the federal requirements for a SWDB under the Workforce Opportunity and Innovation Act (WIOA):

Sec. 4. (a) The cabinet shall serve as the state advisory body required under the following federal laws:

- (1) The Workforce Innovation and Opportunity Act of 2014 under 29 U.S.C. 3101 et seq., including reauthorizations of WIOA.
- (2) The Wagner-Peyser Act under 29 U.S.C. 49 et seq.
- (3) The Carl D. Perkins Vocational and Technical Education Improvement Act of 2006 under 20 U.S.C. 2301 et seq.
- (4) The Adult Education and Family Literacy Act under 20 U.S.C. 9201 et seq.

(b) In addition, the cabinet may be designated to serve as the state advisory body required under any of the following federal laws upon approval of the particular state agency directed to administer the particular federal law:

- (1) The National and Community Service Act of 1990 under 42 U.S.C. 12501 et seq.
- (2) Part A of Title IV of the Social Security Act under 42 U.S.C. 601 et seq.
- (3) The employment and training programs established under the Food Stamp Act of 1977 under 7 U.S.C. 2011 et seq.

The membership of the GWC consists of 34 total members (29 voting members), which include leaders/representatives from:

- Department of Workforce Development
- Commerce (Nonvoting)
- Commission for Higher Education
- Secretary of Education
- Ivy Tech Community College
- Vincennes University
- Research University (Governor's)
- Other College/University Unit (Governor's)
- Apprenticeship (Governor's)



- CTE School Program (Governor's)
- IMA or Industry (Governor's)
- Minority Business (Governor's)
- Women's Business (Governor's)
- Veteran Business (Governor's)
- Builders or Contractors
- In conjunction with Indiana Chamber
- National Federation of Independent Business
- Community Organization (Governor's)
- At-Large Business Owners (3 by Governor)
 - (one <50 employees; one representing technology)
- School Principal (Governor's)
- Local School Corporation Superintendent (Governor's)
- Department of Corrections (Nonvoting)
- Family and Social Services Administration (FSSA) (Nonvoting)
- House of Representatives (Nonvoting)
- Senate (Nonvoting)
- Additional At-Large Appointees (by Governor)
 - (four members)
- Adult Education (DWD)
- Vocational Rehabilitation (FSSA)

3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted

The goal of the waiver is to allow flexibility in the membership requirements of the SWDB under WIOA Sec. 101(b)(1) and (c). WIOA highlights the importance of states working to address the skills gap and align resources. The U.S. Department of Labor has specifically said reducing barriers to allow state innovation and efficiency is always important to the Department's mission of a skilled workforce. The size and membership requirements create barriers to that efficiency.

Under the Cabinet's current SWDB structure, membership includes lead state officials with responsibility for WIOA Title I and Wagner Peyser Act, Adult Education and Family Literacy Act, Vocational Rehabilitation, and other core program partners, elected officials, and representatives from the state's economic development agency and institutions of higher education.

In addition, the SWDB membership also includes representatives from the K-12 education system, Indiana philanthropic organizations, minority businesses, industry associations, and more. A direct correlation can be made to how the SWDB is structured and comprised and Indiana's success in aligning state workforce systems to federal workforce initiatives and programs like the CHIPS and Science Act, Bipartisan Infrastructure Law, and more.

Should the waiver be granted, the SWDB will be able to expand upon recent designations, such as the Silicon Crossroads Microelectronics Commons Hub, Heartland BioWorks Tech Hub, and the Midwest Hydrogen Hub, to ensure education, workforce, and economic development partners are aligned and equipped with the tools to successfully implement the envisioned outcomes of these programs.



4. Describes how the waiver will align with the Department's policy priorities, such as:

- A. Supporting employer engagement
- B. Connecting education and training strategies
- C. Supporting work-based learning
- D. Improving job and career results
- E. Other guidance issued by the Department

The composition of the Cabinet provides an opportunity to hear from and provide solutions to employers in Indiana's key sectors. Regularly scheduled Cabinet meetings, which occur in-person across the State, provide the opportunity for local employers to participate, in addition to sharing their workforce challenges, concerns, and ideas to members of the Cabinet. Unique representation of K-12 leaders from the State's public education system help align State workforce and education goals (e.g., graduation rates, increased work-based learning enrollment, postsecondary education and training, etc.) to employer needs.

The composition of the Cabinet also provides stronger coordination for increased work-based learning opportunities. As detailed in this plan, the Indiana Legislature allocated funding to support students enrolled in work-based learning programs, including funds to overcome barriers to entry. Legislative action was a culmination of recommendations shaped by GWC board members, including industry, education, workforce, and philanthropic partners.

Future outcomes will continue to develop through implementation of the strategies outlined in the State Plan.

5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment

Individuals who will most benefit from this waiver include (1) Hoosier jobseekers who are sidelined from entering the workforce due to barriers (e.g., transportation, childcare, etc.), (2) employers seeking skilled talent for existing industries and employers seeking talent for emerging sectors (e.g., semiconductor manufacturing, electric vehicle battery manufacturing, biolife sciences, clean energy, etc.), and (3) WIOA targeted populations (e.g., individuals with disabilities, youth, veterans, military spouses, farmworkers, and Native Americans among others).

The GWC membership composition includes representatives that most directly serve these populations. By having their voice at the table, the Cabinet is able to identify and apply resources to support individuals-served, monitor success (or challenges) of state workforce strategies and adapt as necessary, and elevate best practices that can be scaled statewide to support state and federal workforce initiatives.

Additionally, local workforce development boards will continue to benefit from increased connectivity of State government (e.g., workforce development, education, economic development, Governor's Office, etc.).

6. Describes the processes used to:

- A. Monitor the progress in implementing the waiver
- B. Provide notice to any local board affected by the waiver
- C. Provide any local board affected by the waiver an opportunity to comment on the request
- D. Ensure meaningful public comment, including comment by business and organized labor, on the waiver
- E. Collect and report information about waiver outcomes in the State's WIOA Annual Report



One of the functions of the Cabinet is to review, monitor, and recommend changes to the state's workforce system. As such, there will continually be an eye toward how Hoosiers are impacted by the policy decisions of the Cabinet and the programs implemented at both a State and local level. Outcomes that result from aligning these systems will be included in the State's annual WIOA report.

7. The most recent data available regarding the results and outcomes observed through implementation of the existing waiver, in cases where the State seeks renewal of a previously approved waiver.

The Cabinet prides itself on the direct results and outcomes observed through the implementation of the existing waiver. Results and outcomes are produced in terms of workforce system improvements and achievements. The composition of the Cabinet has emboldened the State Legislature to act on recommendations proposed by each member of the Cabinet, based on the experienced workforce challenges and opportunities facing their organizations and the populations they service. These include:

- Accelerate Digital Development in Indiana
- Develop a Career Navigation Network
- Prepare Workers with Digital Skills Training
- Incentivize College Graduation Rates for Key Degrees
- Bolster STEM Development via IU/Purdue Realignment
- Define Work-Based Learning and Build a Work-Based Learning Student-Employer Connector Model
- Scale Indiana's Next Level Programs of Study
- Provide Monetary Support to Remove Student Barriers
- Expand Transportation Options for Working Youth
- Increase Access to Early Learning Services
- Increase Adult Education Funding and Launch
- Increase Employers Offering On-Site Education and Training
- Simplify and Automate the Expungement Process
- Auto-Enroll Financially Eligible Students in 21st Century Scholars
- Require High School Students to File the FAFSA
- Restore Frank O'Bannon Grant (state-level grant) Funding to Pre-Recession Levels
- Rethink High School by Increasing Diploma Flexibility
- Increase Access to Credentials of Value
- Incentivize Completion of Credentials of Value in High School
- Increase Access to High-Quality STEM Curriculum and Opportunities
- Strengthen the Educator Pipeline in STEM-Related Subjects
- Focus Early Childhood Education Programs on Educational Results
- Increase Kindergarten Readiness by Establishing a Dolly Parton Library of Indiana
- Ensure Students Can Read by the End of Third Grade
- Award "Second Year" of College to High School Dual Credit/Certificate Completers
- Ensure a Stackable Credential Attainment System



1. Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan

YOUTH WAIVER

For PY 24-25, The State of Indiana is requesting a waiver from Section 129(a)(4)(A) and 20 CFR 681.410, which require not less than 75 percent of funds allotted to states under Section 127(b)(1)(c), reserved under Section 128(a), and available for statewide activities under subsection (b), and not less than 75 percent of funds available to local areas under subsection (c), shall be used to provide youth workforce investment activities for OSY.

Indiana is requesting an extension of the following waiver to this statutory and regulatory provision:

- A waiver of the requirement to expend 75 percent of funding on the OSY population. Indiana is requesting that this percentage be lowered to 50 percent.
- A waiver of the requirement that local funding meets the 75 percent minimum expenditure requirement. Indiana requests that this percentage be lowered to 50 percent to align with the statewide target (see 1 above).
- A waiver of the requirement to expend 75 percent of statewide activities funding on the OSY population. It is requested to reduce this percentage to 50 percent to allow flexibility of funding special projects that meet the vision and mission of the State.

Because JAG Indiana serves students with significant barriers to graduation, approval of this waiver will allow Indiana to continue to invest in at-risk youth before they drop out of high school. When entering the program, approximately 40% of JAG Indiana students have low academic performance or are basic skills deficient.

JAG Indiana serves more than 4,000 in-school youth who are at-risk for dropping out of high school in 125 school-based programs. JAG Indiana has proven outcomes with students graduating at a rate of over 95% for the Class of 2022, which remains higher than the average State graduation rate of 86.6% for all students and 83% of those who receive Free/Reduced price meals. JAG Indiana and WIOA performance goals are aligned to achieve positive outcomes with a focus on attainment of a credential and placement in higher education or training, employment, or military service.

School administrators and counselors refer students to the JAG Indiana programs because of the successful model and associated outcomes. This vulnerable population receives daily counseling and support by "Specialists" while delivering competency-based curriculum. Central to the JAG model is a focus on serving the most disadvantaged youth in communities most in need across Indiana. There is an inherent focus on diversity, equity, and inclusion in our programming both in JAG and WIOA youth services, as enrollments across in-school and out-of-school youth lean into minority populations across multiple intersectionality, including, but not limited to gender, race, sexual orientation, and disability status. Access to high quality programming, like JAG, for these students is of the utmost importance to their sense of belonging and identity which fuels their success in school, as showcased in overall programmatic outcomes shown below:



Programmatic Outcomes	2022	National Goal
Graduation Rate	95%	90%
Entered Employment	73%	60%
Full-time Employment	83%	60%
Full-time Positive Outcomes	83%	75%
Post-Secondary Outcomes	40%	35%

Specific goals of the PY24-25 waiver request are to increase flexibility of WIOA statewide activities and formula funding to support:

- The implementation of evidence-based programs and strategies;
- Progress toward closing the economic inequity gap;
- Placing more Hoosier youth on the path to high-wage skills; and
- Increase college readiness.

All four of the above strategies can be met by continuing to serve and/or increase the number of high school youth served through the JAG Indiana dropout prevention program. This allows us to be proactive about addressing the out-of-school youth problem, while simultaneously increasing the number of youth who enter the workforce and/or post- secondary education with the skills to succeed in either goal.

2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers

Youth Waiver

Since the inception of WIOA, Indiana has requested and been approved for waivers from U.S. Department of Labor to support flexibility in serving in-school youth through the JAG program.

3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted

Youth Waiver

As previously noted, Indiana's high school graduation rate has stagnated at less than 90% for years. While Indiana school counselors are over-burdened with increasing caseloads of students, averaging 532:1 (more than twice the recommended caseload), and growing administrative responsibilities, the State of Indiana is requesting increased flexibility of WIOA statewide activities funding to implement a statewide program focused on providing a comprehensive set of services designed to keep In-School Youth (ISY) attached to the education system to improve their rate of success in achieving educational and career goals. The DWD has identified the Jobs for America's Graduates program to be this solution in schools where it is most needed, given its previously described history of success and linkages to employers and community resources that will best benefit the students it serves.

Following the JAG National performance outcome requirements, DWD and the JAG Indiana program, pledge to strive to meet the following requirements:

JAG National Follow-up Goals

Multi-

Alternative



	Year	Education
Graduation or HSE	90%	75%
Employment	60%	50%
FT Employment (30 hrs./week)	60%	50%
Total Full-Time Positive Outcomes (Employment, Education, Military)	75%	60%
Further Education Rate	35%	30%
Connectivity Rate	93%	93%

As previously shown, DWD has met or exceeded these metrics for over 7 years in a row, with one exception to the Further Education Rate for the Class of 2020, which aligned with national trends due to the COVID-19 pandemic.

4. Describes how the waiver will align with the Department’s policy priorities, such as:

- A. Supporting employer engagement
- B. Connecting education and training strategies
- C. Supporting work-based learning
- D. Improving job and career results
- E. Other guidance issued by the Department

Youth Waiver

This waiver request aligns with the above U.S. Department of Labor policy priorities in numerous ways as noted below:

- Use of the waiver and its focus on JAG in Indiana allows our strong network of over 500 unique employers to connect with in-school youth for employer tours, pathway planning, work experience and internships and myriad other ways that support a strong connection between employer and student;
- Existing strong partnerships with our statewide community college system through Ivy Tech Community College and other education and training partners will continue to grow with use of the approved waiver, encouraging more students to meet the State’s goal of 60% attainment of high-quality credentials by 2030;
- Indiana’s in-school youth programs focus on supporting work-based learning, skills development, and work readiness while promoting training strategies that lead to credential attainment and closing the skills gap; and
- Connection between WIOA in-school youth programming and local high schools ensure students meet the rigorous demands of the Indiana Department of Education Graduation Pathways requirements focused on diploma attainment, demonstration of in-demand employability skills and post-secondary readiness.

5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment

Youth Waiver

Currently, JAG Indiana utilizes a limited amount of WIOA funds to operate its in-school model. With WIOA funds continuing to decline and if Indiana is limited to 25% of WIOA youth funding to serve only in-school youth, DWD would be forced to close over 25 JAG Indiana programs across the State,



potentially removing nearly 1,000 students from the dropout prevention program and negatively impacting local communities statewide.

This waiver will ultimately impact Indiana's at-risk young adult population. WorkOne Centers (Indiana's term for American Job Center) and subcontracted service provider staff, workforce development partners, employers, parents, and school counselors will also benefit from the waiver.

Students enrolled in the JAG program face numerous barriers to success (average of 8 barriers/student). Below is snapshot of the ten (10) most common barriers among our at-risk population:

- Low academic performance (an average grade of C or GPA of 2.0 or below)
- A past record of excessive absences as verified by school officials (10 or more absences)
- Low self-esteem
- Not connected to any extracurricular activities, community orgs, or teams/clubs
- Economically disadvantaged as defined by public assistance, TANF, or free lunch
- Has a fear of speaking in public, is shy, or would like to develop healthy social skills
- Needs transportation to and from work or school
- Lacks motivation or maturity to pursue education or career goals
- Having inadequate or no work experience
- Lacks marketable occupational skills that are in demand in the local labor market

6. Describes the processes used to:

A. Monitor the progress in implementing the waiver

B. Provide notice to any local board affected by the waiver

C. Provide any local board affected by the waiver an opportunity to comment on the request

D. Ensure meaningful public comment, including comment by business and organized labor, on the waiver

E. Collect and report information about waiver outcomes in the State's WIOA Annual Report

Youth Waiver

Monitoring Progress and collecting/reporting information. WIOA programmatic reviews will include an evaluation of how local waivers are being utilized to ensure programmatic goals and outcomes are being met. The regional Youth Directors and State staff dedicated to the administration of the WIOA Youth program will continually examine the effectiveness of waivers throughout the PY, including monthly fiscal reviews and bi-annual desk reviews. This strategy ensures that the objectives described above, as well as those outlined in the existing State and local WIOA plans, are consistent with established objectives of the WIOA, and federal and State regulations.

Since 2006, the State has utilized an electronic case management system for all federal and State eligibility-based workforce investment programs. This system, Indiana Career Connect, is configured to support the full integration of programs, eligibility determination, service recording and tracking, and performance tracking for WIOA, TAA, Wagner-Peyser, Veterans Employment and Training Programs, and Reemployment Programs, as well as for local programs throughout the State, regardless of funding source. Indiana Career Connect has been designed to record service delivery information on every client service while providing transaction records necessary to document program performance. This crossmatch of data allows DWD and Workforce Development Boards to effectively determine such outcomes as credential attainment, employment status and



participant earnings in a more rapid timeframe than other mechanisms. DWD will monitor the progress of the waiver implementation through analysis of local performance results as well as through ongoing oversight and exchanges with local area management and staff.

Local Boards and Public Comment. This waiver request will be available for public comment prior to submission to USDOL/ETA for consideration. The waiver request will be shared with each of Indiana's twelve local workforce development areas, posted on DWD's website, and a copy maintained at DWD's central office for inspection upon request.

7. The most recent data available regarding the results and outcomes observed through implementation of the existing waiver, in cases where the State seeks renewal of a previously approved waiver.

Results and Outcomes data is woven throughout the information listed in Sections 1 – 6 of this waiver request.

DRAFT



Wagner-Peyser Act Program

(a) Employment Service Staff

1. Describe how the State will staff the provision of labor exchange services under the Wagner-Peyser Act, such as through State employees, including but not limited to state merit staff employees, staff of a subrecipient, or some combination thereof.

NOTE: The contents of this section are based upon current practices and requirements found in 20 CFR 653.108 and 20 CFR 653.101 prior to issuance of the Wagner-Peyser Act Staffing Final Rule, which becomes effective January 23, 2024. DWD is currently evaluating the merit-staffing revisions for Employment Services staff and how it may impact Wagner Peyser service delivery and will update this segment of the Plan as applicable.

Indiana's Wagner Peyser program covers the full range of labor exchange activities in our WorkOne system. In the WorkOne centers (Indiana's term for American Job Centers), the Indiana Department of Workforce Development employs over 120 employees through Wagner Peyser funding. These employees partner with the other staff who implement key components of the Workforce Innovation and Opportunity Act. Their tasks include, but are not limited to, initial client evaluation and assessment, job search assistance, re-employment assistance through the RESEA program, employer recruitment and other employer services. Indiana's Wagner-Peyser State merit staff are closely tied to our employers across the State and provide a full range of services directly to our employers to assist them in filling their open positions.

In addition to staff, the Wagner Peyser grant provides tools for State staff and their partners to manage the labor exchange services necessary to match an employer with a potential employee. Some of these tools include Indiana's labor exchange system called Indiana Career Connect. Assessment tools to help employees and employers evaluate the skills needed for critical positions such as Indiana Career Explorer (INCE), WorkKeys, and Tests of Adult Basic Education (TABE) to name a few.

Indiana will also leverage the Skillful Governor's Coaching Corps to provide labor exchange services to constituents. This program is a partnership between Skillful and the State of Indiana. It is an 8-month program that gives career coaches the tools and training they need to better serve Hoosiers in our rapidly changing labor market. The participants represent a diverse mix of organizations: public workforce centers, adult educational institutions, K-12 schools, and non-profits from all 12 Indiana workforce regions. The work that this group completes serves as a foundation for professional development for school counselors and other school personnel to help provide career guidance and advisement to students and parents to help them make more informed decisions.

2. Describe how the State will utilize professional development activities for Employment Service staff to ensure staff are able to provide high quality services to both jobseekers and employers.

DWD will provide training to all staff providing employment services by making use of various media to accommodate different learning styles. These will include, but not be limited to in-person training events, virtual events (webinars and other video recordings available online), self-paced instruction, procedure manuals, and best practices. DWD recently rolled out a new staff portal where all of these materials will be housed and accessible to all regional and DWD staff. Many training opportunities will also include step-by-step instruction guides with visual images incorporated into the guides. Additionally, with most of the training offerings being posted online, there is broader access for more partners within the One-Stop system. DWD will provide business



systems and program training to include the case management and labor exchange system, the business engagement system, and assessment programs/tools for WorkOne constituents.

All DWD employees have been given LinkedIn Learning licenses and Wagner-Peyser staff are assigned job-related training modules to complete as part of their performance expectations and staff development.

DWD's Career Exploration and Coaching staff has created a multi-faceted program to support agency career coaches as well as those in other state organizations or who are part of our community partners. Staff created a website of coaching resources, tools, professional development, labor market information and supporting organizations that have been visited by viewers from every state in the union. The site is updated regularly and found at <https://www.in.gov/dwd/career-coaching>.

Through education reimbursement and tuition assistance programs, DWD reimburses employees who complete post-secondary education courses and degree programs. This improves their general education, knowledge, and skills, to perform their jobs more effectively and advance their careers.

3. Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance (UI) program and the training provided for Employment Service and WIOA staff on identification of UI eligibility issues and referral to UI staff for adjudication.

DWD and UI are working collaboratively on a strategy to ensure the appropriate training and awareness across core programs is provided. One consideration discussed for raising awareness is having a UI representative present at quarterly operations meetings with Wagner-Peyser and WIOA leaders to discuss topical issues within UI. As for training, we would like to have a standardized training that is updated on an annual or more frequent basis and is available virtually that provides an overview of the program and can be used to train new and/or existing staff. Additionally, all RESEA staff are already provided training annually on how to spot potential issues that would require adjudication through activities such as work search.

(b) Explain how the State will provide information and meaningful assistance to individuals requesting assistance in filing a claim for unemployment compensation through one-stop centers, as required by WIOA as a career service.

Indiana implemented technology solutions to help UI claimants with all aspects of their claim. These solutions were implemented in every one-stop comprehensive office across the State. The State identified designated computer terminals and phone lines (called UI kiosks) in every comprehensive office specifically for UI customers. The phones connect directly with the UI customer service contact center for assistance with their claim.

One of the features of UI kiosks is a remote desktop software called Bomgar. This software gives the contact center staff the ability to take over the screen of a UI claimant so they can help walk the claimant through their claim. Any claimant that comes into a comprehensive office is directed to these computers and to the contact center for claim-related questions.

The State also assists clients through a marketed toll-free phone number which is available to the public. All partners have been informed of this hotline and are encouraged to refer clients for all UI related services. The Employment Services staff in the regions also provide over-the-shoulder help to UI claimants as they are navigating the claims filing system.



Two training sessions on UI procedures are provided by UI staff to all WorkOne staff that provides over-the-shoulder assistance to claimants to increase their knowledge to be better able to serve them.

DWD adopted the *ID.me* identity verification service in response to a large increase in UI claim fraud during the COVID pandemic. Smartphones were provided to a Wagner-Peyser funded staff person in each comprehensive WorkOne along with training for them and other staff on assisting customers with the *ID.me* process.

(c) Describe the State's strategy for providing reemployment assistance to UI claimants and other unemployed individuals.

Indiana provides comprehensive statewide reemployment assistance that seeks to support all claimants in returning to work as quickly as possible in high-wage, high-demand jobs. Indiana operates two levels of federal RESEA programs: Initial and Subsequent RESEA to meet the needs of eligible claimants.

The program introduces unemployed Hoosiers to WorkOne services and training opportunities during a one-day orientation and 1:1 Initial Interview, and provides access to additional reemployment services, as appropriate. The program provides claimants the opportunity to learn about reemployment services and activities available through the WorkOne centers. Both Initial and Sub RESEA were designed to help UI claimants return to work sooner and enter a high-wage, high-demand career path; reduce weeks of unemployment; improve the solvency of the UI trust fund; and reduce fraudulent UI claims. Program participation is mandatory upon selection, unless the claimant qualifies for a Manual RES Waiver based on one of the following reasons: moved out of State, currently enrolled in State-approved training, returned to work date within 60 days of separation, or in good standing with a Union Hiring Hall.

The State of Indiana's reemployment strategy consists of the following: After UI claimants have received unemployment for four weeks, they are selected for Initial RESEA through WPRS profiling. Claimants are sent a notification to their home address on record to participate. Claimants are scheduled through Indiana's case management system to participate in RESEA services through one of the WorkOne centers at week six of their claim. Selected participants are required to attend RESEA Initial Orientation and a 1:1 Initial Interview to learn of available WorkOne services and additional program requirements which include:

1. Claimants meet one-on-one with a RESEA Coach to receive current Labor Market Information (LMI),
2. Enrollment in Indiana's Labor Exchange System - Indiana Career Connect,
3. Creation of Individual Reemployment Plan (IRP),
4. Maintaining log of weekly work search activities, and
5. Referral to additional reemployment services.

Claimants are also required to attend follow-up meetings as scheduled to review progress and make necessary adjustments to the IRP until employment is obtained.

If claimants have not been successful in obtaining employment by week fifteen, they will again receive a mail notification and are required to participate in Subsequent (Sub) RESEA at approximately week seventeen. Sub includes a one-on-one meeting with WorkOne staff to reassess



the claimant's work search efforts, review occupations based on transferrable skills, update resume, and reemployment plans to help the individual return to work prior to exhausting their UI benefits. Survival job search and the potential need for referral to partner supportive services are also reviewed.

During PY2022, Indiana began a pilot to test the virtual RESEA option in two regions to allow RESEA claimants the option to select virtual RESEA participation and allow for more flexibility on how customers receive services. The virtual pilot is still underway, and we expect to make a decision based on the results of that pilot in PY24.

(d) Describe how the State will use Wagner-Peyser Act funds to support UI claimants, and the communication between the Employment Service and UI, as appropriate including the following:

1. Coordination of and provision of labor exchange services for UI claimants as required by the Wagner-Peyser Act

Indiana's Wagner-Peyser and UI staff are connected within the same agency and partner together to support claimants throughout their engagement. Indiana has integrated systems that allow Wagner-Peyser registration to occur between UI and the State's Labor Exchange and Case Management System. Additionally, claimants have labor exchange access through both self-service and within any of the WorkOne.

2. Registration of UI claimants with the State's employment service if required by State law

Indiana code IC 22-4-14-2 requires UI claimants to register with Indiana's Employment Service. Indiana has developed automated and manual registration processes for claimants to ensure service delivery is seamless and readily available.

3. Administration of the work test for the State unemployment compensation system, including making eligibility assessments (for referral to UI adjudication, if needed), and providing job finding and placement services for UI claimants

Wagner-Peyser and WorkOne RESEA staff facilitate the administration and initial review of the UI eligibility assessment/working test for claimants. Wagner-Peyser and WorkOne staff refer specific issue types to UI adjudication, when necessary, on those occasions when the automated UI issue system may not identify said issue.

WorkOne staff conduct one-on-one meetings with claimants to develop and update their IRP and provide reemployment services and referrals to training programs based on an individual's needs, interests and aspirations, and barriers to employment. WorkOne staff also encourage UI claimants prior to or during their RESEA program to engage in other workforce programs, as appropriate.

4. Provision of referrals to and application assistance for training and education programs and resources.

WorkOne staff conduct one-on-one meetings with claimants to develop and update their IRP and provide reemployment services and referrals to training programs based on an individual's needs, interests and aspirations, and barriers to employment. WorkOne staff also engage UI claimants prior to or during their RESEA program to engage in other workforce programs, as appropriate.

(e) Agricultural Outreach Plan (AOP). Each State agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of WIOA. The AOP must include an assessment of need.



1. Assessment of Need. Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

NOTE: The contents of this section are based upon current practices and requirements found in 20 CFR 653.108 and 20 CFR 653.101 prior to issuance of the Wagner-Peyser Act Staffing Final Rule, which becomes effective January 23, 2024. DWD is currently evaluating the merit-staffing revisions for Employment Services staff and how it may impact Migrant and Season Farmworkers (MSFW) service delivery and will update this segment of the Plan as applicable.

The assessment of need is geared towards the farmworker activities that the DWD outreach staff, program staff, and Employer Services staff have observed through past outreach efforts. The current primary connection with the Indiana State Department of Agriculture (ISDA) and DWD is with respect to data. DWD staff utilize data provided by both the United States Department of Agriculture and ISDA to identify Indiana's primary crops and data for both State national rankings.

Historically, this has been the sole connection, since the ISDA and DWD have different focuses. The DWD focuses on MSFWs with respect to their housing, working conditions, rights, and access to job opportunities and employment services. ISDA mainly focuses on economic development opportunities, public affairs, soil conservation, Future Farmers of America (FFA), and Indiana grain and buyer's warehouse and licensing. DWD will begin exploring areas of overlap that can be leveraged for collaboration, such as outreach to farmers, corporations, and agriculture organization regarding both economic development opportunities for upskilling workers and ways to create awareness regarding MSFWs. ISDA's relationships with employers could help get outreach staff to MSFWs with more efficiency and ease. Additional strategies in which both agencies can leverage the activities of the other to further their goals will be examined during 2024 and 2025. Implementation of these strategies will begin in 2025.

The needs of these farmworkers and farmworker families range from employment, housing, and education-related to non-agricultural job training and education.

- **Employment:** During Indiana's peak season months, MSFWs are mainly hired through farm labor contractors or crew leaders, who recruit workers for the Agricultural Employer. During this strategic planning phase, the contractor is seeking talent with previous experience in the farm work industry, and usually hires the same workers season after season. The most demanding farm jobs in Indiana are still hand labor-intensive jobs to plant, weed, detassel, harvest, and sort the following crops: corn, tomatoes, melons, pumpkins, and apples. These crops are also the top five labor intensive crops in Indiana for the current program year. March/April to mid-November is considered peak season for Indiana. The farm work season relies heavily on a few factors: climate (either rainy conditions or droughts delay prepping the fields and planting) and shortage of workers which both affect the season. Indiana has been experiencing fewer migrant workers, especially workers from Texas, migrating to Indiana. Anecdotal evidence seems to suggest that many older workers are retiring, the younger generations are seeking other employment opportunities.
- **Education:** MSFWs have multiple barriers to employment that can hinder their chances of advancing their education. For the most part, migrant farm work is a family affair and a way



of life. Due to various migration paths throughout the year, migrant workers often do not receive sufficient education necessary to advance in the labor market. Most migrant workers lack education, have a language barrier, and rarely want to relocate to Indiana to work or pursue other opportunities.

- **Housing:** Many migrant workers depend on employer-provided housing, since they are unfamiliar with the area and need housing that is close in proximity to where the farm work is being performed. In Indiana, an ALC Permit is required if an agricultural employer is going to house 5 or more MSFWs in one location. Additional information and time are required to process and complete an Agricultural Labor Camp (ALC) Permit, which is done yearly. Pre-occupancy housing inspections are performed 45 days before the day of need or anticipated date of hire. The Indiana State Department of Health (ISDH) performs all pre-occupancy agricultural domestic housing inspections to include H-2A inspections as well. The ISDH also assists with initial permits or permit renewals. Housing for MSFWs is difficult to find for a short period of time. This leads to renting non-traditional housing such as apartments, motels, trailer parks, and other means of public accommodations

2. Provide an assessment of the agricultural activity in the State:

1. Identify the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity

The needs of farmworkers in Indiana have remained strong from year to year due to consistent crops, overall agricultural production, and planting and harvesting cycles. The top five labor intensive crops in Indiana are corn, tomatoes, melons, pumpkins, and apples.

The majority of the farm work activity in the State occurs in the northwest, central, and southern regions of the State with bursts of pockets near the following counties: Adams, Madison, Vigo, Sullivan, and Knox counties. Peak season in Indiana varies between March/April to mid-November.

2. Summarize the agricultural employers' needs in the State (i.e., are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce)

Growers are still expressing a shortage of U.S. Domestic workers and are moving towards hiring foreign workers. Last fiscal year (Oct. 1, 2022, to Sept. 30, 2023), the Indiana State Workforce Agency (SWA) processed 212 agricultural clearance orders. DWD will increase collaboration and communication with the ISDA to extend its outreach efforts and impact for MSFWs.

3. Identify any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State.

The agricultural economic factors are projected to be the same next year with effective net results. We have seen an increase in foreign workers in all types of agricultural commodities. Agricultural employers are hiring truck drivers, construction workers, agricultural equipment operators, and mechanics for agricultural work.

3. Provide an assessment of the unique needs of farmworkers by summarizing Migrant and Seasonal Farm Worker (MSFW) characteristics (including if they are predominantly from certain countries, what language(s) they speak, the approximate number of MSFWs in the State during peak season and during low season, and whether they tend to be migrant, seasonal, or year round farmworkers). This information must take into account data supplied by WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, other MSFW organizations, employer organizations, and State and/or



Federal agency data sources such as the U.S. Department of Agriculture and the U.S. Department of Labor (DOL) Employment and Training Administration.

During Program Year 2022 (July 1, 2022, to June 30, 2023), the number of MSFWs that the State's outreach program was able to locate through outreach efforts was 1,408. During peak planting and harvesting periods in the State, the population is estimated at 12,000 workers. During the off season, the MSFW population is at its lowest, estimated at 1,518 workers. In accordance with the definitions set forth in 20 CFR 651 and 20 CFR 655, individuals are predominantly from Mexico, with an increasing number of Haitians from the Caribbean and Dominican Republic. MSFWs from these regions speak Spanish and Creole.

4. Outreach Activities. The local offices outreach activities must be designed to meet the needs of MSFWs in the State and to locate and contact MSFWs who are not being reached through normal intake activities. Describe the State agency's proposed strategies for:

1. Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.

Indiana has two full-time outreach specialists' positions. During peak season, the outreach specialist conducts joint outreach to significant large numbers of MSFWs with the following agencies: the Wage and Hour Division (WHD), Migrant Education Program, Indiana Legal Services, The National Farmworkers Jobs Program (NFJP), and the Mexican Consulate. Additional partnerships and stakeholders are sought throughout the year to expand on the outreach plan for the upcoming season. The Migrant Education Program is under the umbrella of the Indiana Department of Education (DOE). This program provides education services to MSFWs during the peak season. DWD and DOE staff conduct joint outreach every year.

2. Providing technical assistance to outreach staff. Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the Employment Service and Employment-Related Law Complaint System ("Complaint System" described at 20 CFR 658 Subpart E), information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

Recently, the State's outreach program has been working on a systematic approach for engaging MSFWs for services at our local WorkOnes. A weekly report from Indiana's labor exchange/case management system is completed in search of MSFWs who have completed a registration within the system. As part of our outreach efforts, staff communicate with potential MSFWs to determine if they fall into this category. They also inquire about the type of farm work being performed and update their employment history to reflect the seasonal farm work. During this communication, the outreach specialist provides an overview of the employment and training opportunities available at the nearest WorkOne and a brief overview of farmworker rights, along with awareness of the complaint system process.

The SWA provides opportunities for staff to participate in local events within the community of MSFW service and support agencies and groups. This allows our outreach staff to learn about new programs and services as well as leverage and build partnerships.

The SWA schedules a pre-season meeting (late February) and a post-season meeting (mid-November), which are led by the State Monitor Advocate (SMA). At these meetings the SMA will



connect with all outreach staff as well as the twelve workforce regions to provide training on several topics, such as: identifying and determining MSFWs at the local WorkOnes, an overview/refresher of the complaint system, farm labor contractor registrations, terms, and conditions of employment for all agricultural job orders and raising awareness in the form of presentations from other MSFW agencies. These pre and post season meetings provide technical assistance to the outreach staff in building stronger connections and collaborations with the WorkOne Centers

3. Increasing outreach staff training and awareness across core programs including the Unemployment Insurance (UI) program and the training on identification of UI eligibility issues.

The SWA has translated the UI Claimant Handbook and the *Filling for Unemployment Insurance* brochure into Spanish and Creole languages, increasing its access and use among Indiana's MSFW population. These resources provide MSFWs with a better understanding of the UI program and allow advocacy staff to articulate the UI process with this information. This will better prepare MSFWs in applying for UI.

Indiana designated UI computers in the one-stop comprehensive centers to help UI claimants with questions and/or issues about their claims. Staff direct claimants to use the computers, which connects them directly with a UI customer service representative at the call center. The UI call centers do have bi-lingual staff available for Spanish speakers. For languages besides Spanish, the call center uses the State's QPA vendor for interpretation services.

The Reemployment Services and Eligibility Assessments Program (RESEA) worked with the SWA and SMA to identify MSFWs within the program. RESEA forms and documents are available in the Spanish and Creole language for MSFWs who are English Learners.

4. Providing outreach staff professional development activities to ensure they are able to provide high quality services to both jobseekers and employers.

State merit outreach staff have two mandatory annual trainings, human trafficking, and sexual harassment, followed by ongoing in-house professional development trainings throughout the year.

5. Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.

The SWA Outreach Staff has a close working relationship with NFJP grantee staff, and other MSFW organizations, such as the Mexican Consulate, Migrant Education Program, Department of Wage and Hour, and Indiana Legal Services. The outreach program staff will continue to partner with NFJP grantee staff to identify MSFW needs. The SWA will continue to engage with other organizations for the purpose of identifying and assisting MSFWs through partnerships, such as those with food pantries and soup kitchens, to deliver goods and resources to migrant and seasonal farmworkers in the State of Indiana. Indiana Grown and Feeding Indiana's Hungry are new partner agencies that outreach staff have participated with.

5. Services provided to farmworkers and agricultural employers through the one-stop delivery system. Describe the State agency's proposed strategies for:

A. Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. This includes:

- i.** How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers; and
- ii.** How the State serves agricultural employers and how it intends to improve such services.



To ensure MSFWs have access to services at Indiana's WorkOnes, the SMA identifies areas for improvement in the delivery of services to MSFWs. The SMA meets with service providers at the local level to identify priority issues and to develop better processes to determine the appropriate technical assistance necessary. The SMA provides annual training at the IMFC (Indiana Migrant and Seasonal Farmworker Coalition) meetings. The SMA provided a recorded webinar, which can be used for onboarding, a refresher course, and/or mandatory training. The training and other MSFW related items can be found on the WorkOne Portal for staff to access at any time.

B. Marketing the Complaint System to farmworkers and other farmworker advocacy groups.

The United States Department of Labor has launched <http://MigrantWorker.gov> (in English) and <http://TrabajadorMigrante.gov> (in Spanish) to ensure that migrant workers have access to information and resources to their rights on the job.

C. Marketing the Agricultural Recruitment System for U.S. Workers (ARS) to agricultural employers and how it intends to improve such publicity.

DWD continues to provide agricultural employers assistance with their labor needs. When local domestic workers are not available, SWA provides technical assistance to growers to aid them in accessing the interstate Agricultural Recruitment System (ARS). We also intend on building a connection with the ISDA to help raise awareness among employers and agriculture organizations. Our local office staff continues to provide farm labor contractors assistance in preparing applications for certification within the U.S. Department of Labor. During 2023 and 2024, the SWA, along with the business service consultants, will engage in an ARS and Agricultural Employer Service training. The training will be provided to all twelve local workforce development areas. This training will consist of posting jobs on Indiana's labor exchange system, conducting local recruitment events or job fairs at the employment offices, and familiarizing staff with terms and conditions of employment.

6. Other Requirements.

A. Collaboration. Describe any collaborative agreements the State Workforce Agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and establish new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

The SWA has three collaborative agreements or Memoranda of Understanding (MOUs) with the following entities:

1. A monetary MOU with the Indiana State Department of Health (ISDH) for pre-occupancy farm worker housing inspections
2. NFJP Proteus Inc., as mandated by TEGL 8-17
3. Indiana Wage & Hour Division

DWD contracts the Indiana State Department of Health and its inspectors to conduct pre-occupancy farm worker housing inspections. This monetary MOU outlines the roles and responsibilities of each party regarding the housing inspections in the State of Indiana. The SWA will continue to partner with ISDH over the next two years and will renew the MOU on or before September 30, 2024.

The State Monitor Advocate (SMA) will continue to partner and collaborate with National Farmworker Jobs Program (NFJP) as per TEGL 8-17, with the required non-monetary MOU between



State Monitor Advocates and National Farmworker Jobs Program (NFJP) grantees. This non-monetary MOU establishes a pathway to ensure that MSFWs will have access to career pathways, job training, and other supportive services offered between the two parties. This partnership will continue to work together within the next four years by conducting joint outreach to MSFWs, data collecting, attending meetings, SMA providing complaint system training and any other events deemed necessary. The non-monetary MOU is valid between 2023 and June 30, 2025, with renewal options evaluated by June 30, 2024. Therefore, as the Indiana Department of Workforce Development (DWD) engages with other migrant and seasonal farmworker agencies, new partnerships are created along with new agreements.

The DWD created a MOU between DWD & Wage and Hour Division (WHD). This Non-Monetary runs from October 2023 to September 2024 and allow joints for outreach to be conducted when appropriate and assists the SMA with information sharing in regard to Agriculture employers, exchanging investigative leads, complaints, and referrals of possible violations, to the extent allowable by law or policy.

B. Review and Public Comment. In developing the AOP, the SWA must solicit information and suggestions from NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations, and other interested organizations. In addition, at least 45 calendar days before submitting its final AOP, the SWA must provide a proposed plan to NFJP grantees, public agencies, agricultural employer organizations, and other organizations expressing an interest and allow at least 30 days for review and comment. The SWA must: 1) Consider any comments received in formulating its final proposed AOP; 2) Inform all commenting parties in writing whether their comments have been incorporated and, if not, the reasons; therefore, and 3) Transmit the comments and recommendations received and its responses with the submission of the AOP.

In accordance with 20 CFR Subpart B, 653.107 & 108 (4), the State Monitor Advocate participated in the preparation of the agricultural plan and has been afforded the opportunity to approve and comment on the plan. Such review indicates that the plan has been prepared properly, omitting none of the prescribed requirements, and properly describes the activities planned for providing services to both agricultural employers and migrant seasonal farmworkers.

WIOA Section 167 NFJP grantee, Indiana Farm Bureau, Purdue Agriculture Extension, Pathstone Corporation, Indiana Family & Social Services, Indiana Housing and Community Development Authority, Indiana Department of Education, Community Development Institute Head Start, and Indiana Migrant and Seasonal Farmworker Coalition will be solicited for information and suggestions in the formulation of this plan and/or provided the opportunity to comment.

The AOP will be uploaded to the MSFW DWD webpage by the Department's webmaster.

i. The AOP must include a statement confirming NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organizations and other interested employer organizations have been given an opportunity to comment on the AOP. Include the list of organizations from which information and suggestions were solicited, any comments received, and responses to those comments.

[*NOTE: This section will be updated following the public comment period. The SMA will contact members of the Indiana Migrant & Seasonal Farmworker Coalition to include (NFJP) to advise them about the Indiana WIOA Unified Plan and the AOP and encourage comment.]



C. Data Assessment. Review the previous four years Wagner-Peyser Act data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

The provisions and proportionate services to MSFWs in Indiana have been steadily improving over the past 4 years, and in PY 18, the State achieved all of the five equity indicators, showing services provided to MSFWs and non-MSFWs. See the data chart below.

Program Year 2019 Equity Indicators	1-Referred to Jobs	2-Provided with a Service	3-Referred to Supportive Services	4-Provided with Career Guidance	5-Job Development Contacts	Achieved Equity
MSFWs	65.2%	100%	0.0%	56.2%	8.7%	
NON-MSFWs	40.5%	100%	0.0%	48.5%	9.42%	
	1.6	1.0	0	1.15	.92	No
Program Year 2020 Equity Indicators	1-Referred to Jobs	2-Provided with a Service	3-Referred to Supportive Services	4-Provided with Career Guidance	5-Job Development Contacts	Achieved Equity
MSFWs	20.4%	100%	4.08%	71.43%	4.08%	
NON-MSFWs	4.83%	100%	1.08%	60.70%	.83%	
	4.22	1.0	3.7	1.17	4.9	YES
Program Year 2021 Equity Indicators	1-Referred to Jobs	2-Provided with a Service	3-Referred to Supportive Services	4-Provided with Career Guidance	5-Job Development Contacts	Achieved Equity
MSFWs	16.67%	100%	38.10%	54.76%	19.05%	
NON-MSFWs	21.55%	97.95%	8.85%	41.42%	10.21%	
	.77	1.02	4.3	1.3	1.8	NO
Program Year 2022 Equity Indicators	1-Referred to Jobs	2-Provided with a Service	3-Referred to Supportive Services	4-Provided with Career Guidance	5-Job Development Contacts	Achieved Equity
MSFWs	38.2%	98.88%	28.09%	43.82%	19.10%	
NON-MSFWs	15.23%	97.53%	7.07%	36.97%	11.20%	
	2.5	1.01	3.97	1.18	1.7	YES

The following factors will address equity and ensure that MSFWs receive services on a basis which is qualitatively equivalent and quantitatively proportional to services provided to non-MSFWs. MSFWs who go into a local one-stop center to obtain the full range of employment and training services, include an overview of the complaint system, will receive a full Wagner-Peyser application



with the following mandatory referrals to employment opportunity and supportive service. MSFWs will additionally receive services at their local WorkOne with an emphasis on career guidance and job development contacts, if applicable.

MSFWs who are not being reached by the normal intake activities at the local WorkOne will meet with the State's outreach program specialist, who will explain to MSFWs in their own language the availability of referrals, services, and an overview of the complaint system, as well as a basic summary of farmworker rights. If an MSFW is not able to visit a local WorkOne, outreach staff will enroll MSFW in Wagner-Peyser services, provide appropriate referrals and services in the field, and will then advise the SWA and SMA of the MSFW jobseeker. The SWA will then communicate with the local WorkOne where the MSFW resides to connect and engage that individual with employment and training services at the AJC or other affiliate or access point sites.

D. Assessment of progress. The plan must include an explanation of what was achieved based on the previous AOP, what was not achieved and an explanation as to why the State believes the goals were not achieved, and how the State intends to remedy the gaps of achievement in the coming year.

Many achievements were made at the SWA level during PY22. In addition to the SMA and outreach staff, the SWA has added an additional outreach specialist position to support outreach efforts and also plans to hire this staff person in PY23.

The SWA developed policies and procedures that support MSFW services in the WorkOne centers, while providing technical guidance on how to increase service levels. The SWA has several technical assistance trainings scheduled for PY23 to include the MAS Refreshers and trainings, FLC Registrations, and ARS. It should be noted there are a few opportunities for improvement that have been identified such as placements and referrals to clearance orders, stronger local recruitment for Ag employer job orders. The SWA plans to review these opportunities throughout PY24 and PY25.

The SWA has developed a Self-Appraisal System to determine success in reaching goals and to correct deficiencies in performance. Implementation will begin in PY23.

E. State Monitor Advocate. The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

The Indiana State Monitor Advocate had the liberty to review and approve the SWA's Agricultural Outreach Plan (AOP) on [DATE TBD].

WAGNER-PEYSER ASSURANCES

The State Plan must include	Include
1. The Wagner-Peyser Act Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time (sec 121(e)(3));	Yes
2. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	Yes



<p>3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and</p>	<p>Yes</p>
<p>4. SWA officials:</p> <ol style="list-style-type: none">1) Initiate the discontinuation of services;2) Make the determination that services need to be discontinued;3) Make the determination to reinstate services after the services have been discontinued;4) Approve corrective action plans;5) Approve the removal of an employer's clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days;6) Enter into agreements with State and Federal enforcement agencies for enforcement- agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.	<p>Yes</p>
<p>5. The SWA has established and maintains a self-appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).</p>	<p>Include</p>
<p>6. Enter into agreements with State and Federal enforcement agencies for enforcement- agency staff to conduct field checks on the SWAs' behalf (if the SWA so chooses); and</p>	
<p>7. Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.</p>	



Adult Education and Family Literacy Act Program

The Unified or Combined State Plan must include a description of the following as it pertains to adult education and literacy programs and activities under Title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

A. Aligning of Content Standards

Describe how the eligible agency has aligned its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The College and Career Readiness Content Standards (CCR) form the instructional foundation of Adult Education program. The CCR standards are used to identify academic skills that students need to know and be able to do. A career-infused classroom integrates contextualized instruction aligned to the CCR Standards with career awareness, self-exploration, career exploration, and career planning.

In Indiana, Adult Education providers are expected to provide standards-based instruction using the College and Career Readiness Standards. The gap between the knowledge and skills of adult learners and the expectation of colleges, training programs, and employers drives the movement to standards-based education. The standards were created as a manageable set of foundational knowledge indispensable for addressing this gap and preparing adult learners for college and careers. Additionally, the standards provide direction on where to focus instruction, a coherent framework for scaffolding student learning, and consistent expectations across the State.

In mathematics, for example, the standards reflect content typically taught in both beginning and more advanced algebra and geometry courses, as well as in data analysis and statistics classes. The ELA/literacy standards demand robust analytical and reasoning skills and strong oral and written communication skills. The integration of CCR standards into adult education programs is intended to provide all adult students with the opportunity to be prepared for postsecondary training without needing remediation. Integrating these standards into instructional delivery is essential to enabling adult learners to meet the real-world demands of postsecondary training and employment leading to high-demand careers in growth industries.

B. Local Activities

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.
Adult education; Literacy;

Special Rule. Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to



using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

The Indiana Department of Workforce Development (DWD) solicits applications and proposals from entities eligible to receive WIOA Title II funds. Applicants can apply for funding in the following areas: Adult Education and Literacy Activities – WIOA Title II (per 29 USC §3272); Adult High School Credit Program/Adult Secondary Credit (ASC); Corrections Education and Education for Institutionalized Individuals; Integrated Education and Training Activities (IETs); Workforce Education Initiative (WEI); Professional Development Facilitator Network; and/or Indiana Online Only Distance Education.

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

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

Indiana only requires an applicant to provide effectiveness data for the content domains that are relevant to the services in the State's application for funds. In the State's multi-year adult education competitive grant application (request for application), all applicant organizations should complete all questions listed under each consideration (I-XIII, XIV) regardless of the type(s) of funding the applicant is seeking.

All applicant organizations should address Consideration XIV [General Education Provisions Act (GEPA)]. Considerations I-XIII represent the thirteen statutory considerations DWD must consider when awarding WIOA Title II funds, while Consideration XIV is used to meet the statutory GEPA plan required for all AEFLA funded sub-recipients. Failure to provide answers for the narrative portion of the application is grounds for non-consideration

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

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

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



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

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

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

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

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

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

In making initial award determinations to applicants, DWD will evaluate: 1) accomplishments and progress toward goals; 2) capacity and efficiency in service delivery; 3) gaps and barriers that limit participation; and 4) employment and labor market demands.

Applicants apply for a region or a portion of the funds available in each region they intend to serve.

Renewals will be made on a program-by-program basis and will be contingent on the sub-recipient's ability to (1) Successfully implement the terms of the grant; (2) Meet both State and federal performance expectations; and (3) Provide demonstrated value to the community the sub-recipient serves.

Funding for future grant continuations will include program performance. DWD reserves the right to hold a new competitive grant competition(s) during the multi-year adult education grant cycle.

DWD allows funding to be passed through a sub-recipient to subcontracted service provider(s). No more than 5% of the total amount awarded to grantees shall be used for administrative and non-instructional purposes. For DWD to maintain the federally required Maintenance of Effort (MOE), Indiana requires that WIOA-funded Adult Education providers contribute a local match.

Other Requirements: Increased collaboration between Indiana Adult Education grant recipients and the local workforce development boards (LWDBs) is encouraged. The grant requires that LWDBs have an opportunity to review all applications submitted to DWD that propose to offer services within the local workforce development area.

Any recipient of funds awarded must provide reasonable accommodations to all qualified individuals (both employees and students) with disabilities unless that accommodation would represent an undue burden in the exercising of the responsibilities of the sub-recipient to deliver adult education and literacy activities. Accepting an award is an acknowledgement that the grant



recipient is following the Americans with Disabilities Act. Applicants are also required to acknowledge compliance with the General Education Provisions Act (GEPA).

C. Corrections Education and Other Education of Institutionalized Individuals

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate programs that provide any of the following correctional educational programs identified in section 225 of WIOA:

- Adult education and literacy activities
- Special education, as determined by the eligible agency
- Secondary school credit
- Integrated education and training
- Career pathways
- Concurrent enrollment
- Peer tutoring
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

Indiana's process to award funds provided under Programs for Corrections Education and Other Institutionalized Individuals is the same as above (b). Further, DWD awards between 1% and twenty 20% percent of the total funds made available through an RFA to be used specifically to provide adult education and literacy activities to eligible individuals currently incarcerated in a State prison or correctional facility, a county jail, or are currently participating in Indiana's community corrections program. DWD requires all programs providing adult education and literacy activities to criminal offenders in State or county custody to give priority to individuals who are likely to leave State or county custody within 5 years of receiving adult education and literacy services.

In the RFA, eligible providers list the location(s) where adult education activities including adult education, literacy, secondary school credit, English language acquisition, workforce preparation and IET to eligible individuals who are currently inmates in State prisons, county jails, or are part of Indiana's community corrections programs are planned. A description of how the applicant plans to identify and provide services for eligible individuals with accommodated educational needs (disabilities and/or learning disabilities) in the corrections environment must be specified. Additionally, the applicant's capacity to deliver adult education and literacy activities must be addressed, as well as how the applicant plans to offer or partner with others to offer transitional services to eligible individuals exiting custody.

D. Integrated English Literacy and Civics Education Program

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA. Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.



In Indiana, WIOA Title II [§203(12)] authorizes the funding of programs providing adult education and literacy activities to English Learners (ELs), including professionals with degrees and credentials in their native countries, that enable adults to achieve competency in the English language and acquire both the basic and more advanced skills necessary to function effectively as parents, workers, and citizens of the United States. These services include: 1) academic instruction in literacy and English language acquisition – reading, writing, speaking, and comprehending; 2) instruction on the rights and responsibilities of US citizenship and civic participation; and 3) workforce training.

To receive funding for Integrated English Literacy and Civics Education (IELCE) under WIOA [§243] in Indiana, a program must: 1) prepare adults who are ELs for unsubsidized employment in high-demand occupations or career pathways, which lead to economic self-sufficiency; 2) assist ELs in achieving competency in English reading, writing, speaking, and comprehension; 3) lead to a secondary school diploma (high school diploma or HSD) or its equivalent (HSE or high school equivalency); 4) lead to ELs entering postsecondary education or training; and 5) offer adult education instruction in combination with IET.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be offered in combination with integrated education and training activities found in 34 CFR section 463.36.

Note: Content for this section is included within the section labeled "Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency."

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation.

Note: Content for this section is included within the section labeled "Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency."

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

IETs for IELCE students are intentionally short-term, a minimum of 40 hours, and a maximum of 14 weeks. The certification must be industry-recognized and high-demand occupations prior to approval. These basic requirements provide adults opportunities that lead to economic self-sufficiency. Immigrants often experience issues with verification of foreign credentials and licenses. IELCE activities may include foreign credential verification along with additional resources within a larger network.

The RFA requires potential providers to 1) explain how the applicant organization plans to provide contextualized instruction to eligible individuals; 2) how CCR standards will be used to enhance



instruction and align with WIOA; 3) how career readiness and workforce skills will be taught to eligible individuals; 4) how the organization intends to offer contextualized instruction; and 5) how the organization will implement career awareness curriculum.

Applicants are required to address in the RFA 1) the specific occupation or occupational sector that the proposed IET will cover; 2) the funding that will be used for the training portion of the proposed integrated education and training; 3) the intensity and quality of the adult education and literacy activities component of the organization's proposed integrated education and training class(es); 3) the occupationally relevant materials that will be used; and 4) the specific workforce preparation activities that will be included in the proposed IET and how these activities will be provided.

Additionally, the RFA requires applicants to describe how the 3 required components of IETs will occur simultaneously with academic instruction in literacy and English language acquisition and instruction on the rights and responsibilities of US citizenship and civic participation.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

In Indiana's RFA, entities must describe how the applicant plans to continually align its services with the workforce development regional plans (local plans) must also be included. The applicant organization's relationship with the one-stop partners in the communities where it is applying for funding and how the applicant organization intends to work with one-stop partners to ensure the efficient delivery of adult education and literacy services to eligible individuals must be addressed. This includes plans for co-enrollment, referral services, and infrastructure costs.

E. State Leadership

Describe how the State will use the funds to carry out the required State Leadership activities under section 223 of WIOA.

Alignment

In Indiana, there is robust alignment of adult education and literacy activities with other core programs and one-stop partners. Through State and local collaborations between adult education, vocational rehabilitation, family and social services, workforce employment providers, and other partners, Hoosiers participate in a sequential series of services that result in a seamless transition to employment and/or enrollment in postsecondary education or training. While clients enter through multiple doors, the objective is the same – a seamless referral system. In addition to traditional classes within school facilities, classes for eligible adult participants take place at workforce offices, community centers, houses of worship, employers, and postsecondary institutions.

Referral procedures and data sharing are in place among cross agencies. Adult education providers have access to the newly developed Virtual Client Engagement (VCE) tool. This allows providers to make learner referrals to partner agencies as well as schedule and attend appointments virtually. Curricula are aligned with the College and Career Readiness Standards to reflect the content most relevant to preparing adult students for success in colleges, technical training programs, work, and citizenship—in the areas of English language arts/literacy and mathematics. Assessment and other professional development opportunities are shared between core partners. The workforce system provides assessment services and provides results to adult education partners and other agencies.

Adult education staff convene regional consortia to discuss and share promising practices and barriers to participant success. In adult education, WIOA Regional Support Managers (RSM) enhance the strong alignment and coordination already in place with WIOA partners. Additionally, the new WIOA Partner Cross Training between WIOA 1, 2, 3, & 4 is a way to encourage and foster alignment.

Indiana Career Explorer is provided across systems to assist participants with the exploration of career possibilities, to help them make decisions about their future, and prepare for the next step in their education and career planning journey. Indiana Career Explorer is a comprehensive starting point for determining career interests and abilities and is a required part of orientation for all adult education participants. Meanwhile, Indiana Career Connect (ICC) and the Hoosier Talent Network are available to connect employers with job ready talent.

High Quality Professional Development

Indiana Adult Education has established a solid foundation for the delivery and operation of a high-quality professional development program to facilitate and improve instruction.

Professional Development Facilitators (PDFs) are an anchor for State leadership activities. They are a network of lead adult education instructors who are trained to model and deliver the highest quality professional development both locally and regionally. Professional development delivered by PDFs are tied directly to State and federal adult education performance measures. PDFs develop local and regional professional development plans and share their knowledge and expertise to assist adult education programs and DWD with continuous adult education program improvement.

In addition to modeling effective teaching strategies, PDF responsibilities include development of local professional development plans in conjunction with program directors and DWD representatives; creation of new teacher trainings and orientations; delivery of assessment and accommodations trainings; and one-on-one assistance to instructors as required by DWD or requested by local program directors.

Supplemental professional development is offered based on a needs assessment. Sessions are reviewed by participants and evaluated by the professional development team. Local providers must incorporate lessons learned into local programming, performance targets, and provide feedback through written reports. Past examples included face-to-face trainings and virtual offerings on topics such as Addressing Racism in the Classroom; Evidence-Based Reading; Integrated Education and Training | Workforce Education Initiative Training; New Teacher Training; and Promising Strategies for the Implementation of Distance Education and Remote Instruction.

The Indiana Mentoring Project, in collaboration with DWD and the State adult education professional association, provides opportunities for administrators of adult education, especially new or nearly new, to connect with a retired director of adult education. The project offers technical assistance, professional development, promising practices, and on-demand, individualized coaching to cultivate and support new leaders for continued success.

The State adult education office typically sponsors conferences in partnership with its professional organization. The event is a shared educational/professional development opportunity for adult educators, directors, administration, and support staff, WorkOne staff, career and transition counselors, and other adult education stakeholders. The conference allows sharing of promising



practices and presents opportunities to model effective strategies, including technology and resources, for adult educators.

Sessions are aligned with other one-stop partners to ensure that coordination occurs at all levels of engagement. Sessions are evaluated by participants and results are shared with DWD's professional development team as a guide in planning additional opportunities and technical assistance throughout the program year. DWD's professional development team reviews the conference's agenda and solicits session presenters based on this coordinated effort.

Topics are chosen, in part, based on the State's professional development initiatives and how Indiana can strengthen and build upon its adult education delivery system based on negotiated performance targets.

Disseminates Promising Practices

DWD's adult education professional development initiative provides technical assistance; develops and disseminates instructional and programmatic practices based on scientifically valid research; promotes access to employment, education, and training services; and offers assistance in the use of technology. Teachers and instructional aides working nine (9) or more hours per week in adult education are required to complete a minimum of one (1) DWD adult education sponsored professional development initiative annually. Each DWD professional development initiative must be a minimum of 10 hours in length, will be extended over time, and will be either job embedded or require participation in a community of practice. In partnership with the State's professional organization, many COABE and LINC's trainings are made available to meet this requirement.

Each local professional development plan is approved individually by the professional development team and encompasses goals based on scientifically valid research that will contribute to meeting specific performance metrics. DWD's Workforce Education Initiative (WEI) pairs adult education, the workforce system, and businesses with employees who require basic skills upgrading to be successful on the job. An adult education coordinator serves as a workforce resource. Meanwhile, Integrated Education Training (IET) programs are approved individually at the State level, must be 40 hours in length and no more than 14 weeks in length, and lead to an industry-recognized credential. Curricula are evaluated and technical assistance is provided when required by the State adult education office.

Monitoring Quality and Improvement

The State adult education team continually monitors and evaluates adult education programming throughout the State. Monthly reports are sent to programs outlining performance compared to the same time a year ago and to State averages. Performance metrics are shared and evaluated with PDFs to implement strategies to improve the delivery of instruction and services to participants and core partners. Monthly statewide webinars take place and include performance goals, and initiatives to meet benchmarks. Three State adult education team members serve as the State's monitoring team. Risk assessments are conducted, and programs are chosen for yearly monitoring visits. Reports are written and distributed, and technical assistance, including individualized professional development, is provided to correct deficiencies.

Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable.



In addition to regional support managers and State staff who provide technical assistance, Professional Development Facilitators (PDFs) provide “boots on the ground” to monitor and evaluate State and local initiatives that will foster improvement in teaching and learning. State goals are outlined each year and local professional development plans are created based on State initiatives and local goals. PDFs determine where needs exist and develop yearly plans to advance services, build communities of practice, monitor, and evaluate performance targets, and institute promising practices based on sound research.

The Workforce Education Initiative (WEI) brings adult education, businesses, and employees together to skill up workers who lack basic skills and require additional training for improved performance on the job and career advancement. The State adult education office provides a dedicated position to provide this linkage. Each workforce project submitted must be approved by the State coordinator, who provides technical assistance, promotes promising practices, and monitors and evaluates performance.

Additionally, Indiana Adult Education requires that each funded provider employ an academic and career counselor. This position is a bridge between students, program staff, employers, workforce, higher education, and other core partners to lessen barriers to participation. The State adult education office provides a dedicated position to provide this coordination.

F. Assessing Quality

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II. Describe how the eligible agency will take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Describe how the eligible agency will use evaluations, data analysis, program monitoring, or other methods to improve the quality of adult education activities in the State.

The State office employs regional support managers to provide technical assistance and State adult education staff provide targeted professional development in assigned regions. In addition to visiting classes, the team reviews goals, conducts monthly desk audits, and provides analysis and interpretation of performance data. Each program provides comparisons to how the provider is performing regionally and to State averages. Every program employs or has access to a Professional Development Facilitator (PDF), a lead teacher who works with instructional staff and leadership on program improvement and student success.

PDFs work together with the State’s professional development team to set goals, identify and target areas of program improvement, and facilitate professional development trainings and activities that promote student achievement. Each PDF is responsible for the development of a local professional development plan, which must be approved by the State adult education team. Additionally, PDFs monitor and evaluate progress according to State benchmarks.

The Indiana Mentoring Project, in collaboration with DWD and the State adult education professional association, provides opportunities for administrators of adult education, especially new or nearly new, to connect with a retired director of adult education. New administrators are usually more open to asking questions with a mentor as they evaluate problems, consider solutions, and utilize data for continuous improvement. A mentor can individually address specific issues and provide guidance, encouragement, and support.



Three adult education staff serve as part of the State’s monitoring team. The data team alerts State staff when questions arise or if there are irregularities in data submissions. The monitoring team utilizes a formal monitoring instrument to review and evaluate providers. Programs are chosen for monitoring based on risk assessment. An exit interview is conducted at the conclusion of the visit with leadership and a formal report is written and submitted to the provider. A corrective action plan may be necessary and is coordinated through the regional adult education coordinator. Additional technical assistance and localized professional development are often required to correct deficiencies.

The State office employs a workforce coordinator and an academic and career coach liaison. The Workforce Education Initiative (WEI) targets employers with workers who possess basic skill deficiencies and desire to maintain their jobs or improve performance. Additionally, this project supports employers in hiring and retaining workers who will be able to meet demands for productivity, safety, and advancement. The State coordinator reviews and assesses the quality of each workforce application and proposal and provides recommendations for improvement before the State approves the project. Meanwhile, the academic and career coach liaison oversees, monitors, and evaluates the State project; each program is required to employ an individual in a similar position at the local level. The intent of this position is to reduce or eliminate barriers to student participation and build a foundation to increase academic and career success for students.

Professional Development Facilitators (PDFs) are lead teachers in local programs who conduct needs assessments and gauge the quality of the professional development provided. In Indiana, professional development is based largely on local needs and State initiatives. A local program receives a stipend for its PDF and dollars are specifically provided for the PDF's own professional development. As a result, PDFs are required to submit local professional development plans that are monitored closely by the State team. In quarterly reports, PDFs assess the quality of professional development locally and provide successes and challenges. The professional development team brings PDFs to statewide meetings twice a year along with directors of adult education to solicit recommendations and feedback. Any professional development offered must be applied and implemented in the classroom and results shared. A guiding question is, “Did the professional development impact instruction, learning, and student success?”

Targeted professional development trainings, including the joint annual conference developed by the professional development team and the professional organization, are evaluated individually by participants. Results are shared and analyzed to improve and build on future events and activities.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS

The State Plan must include	Include
1. The plan is submitted by the State agency that is eligible to submit the plan;	Yes
2. The State agency has authority under State law to perform the functions of the State under the program;	Yes
3. The State legally may carry out each provision of the plan;	Yes
4. All provisions of the plan are consistent with State law;	Yes



5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan;	Yes
6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan;	Yes
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan; and	Yes
8. The plan is the basis for State operation and administration of the program;	Yes

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM ASSURANCES

The State Plan must include	Include
1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding the supplement-not-supplant requirement);	Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA;	Yes
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not “eligible individuals” within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA;	Yes
4. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program.	Yes
5. The eligible agency agrees that in expending funds made available under Title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303).	Yes



AUTHORIZING OR CERTIFYING REPRESENTATIVE

APPLICANT'S ORGANIZATION	Enter information in this column
Applicant's Organization	Indiana Department of Workforce Development
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	Enter information in this column
First Name	Richard
Last Name	Paulk
Title	Commissioner
Email	rpaulk@dwd.in.gov

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

All applicants are required to attach a description of the steps the applicant organization proposes to take to ensure equitable access to, and participation in, its federally assisted program. Failure to address the GEPA consideration results in the non-consideration of the submitted application.

Programs address the special needs of students, teachers, and other program beneficiaries to overcome barriers to programming and participation, including those based on gender, race, color, national origin, disability, and age. Through monitoring, the State office ensures that local providers give equal access to, and equitable participation in, all such projects.

Additionally, all WIOA Section 223 State Leaderships funds utilized for professional development will include steps to ensure equitable access to, and participation in, the federal grant program by local adult education personnel, including administrators, teachers, aides, academic and career coaches, and other staff who participate.

The State adult education office continually identifies improvement strategies and the need for targeted professional development offerings among instructional staff at the local level. Indiana utilizes State Leadership funds to formulate a local network of teachers to determine effective strategies for engaging them in improvement efforts. This activity continues to address barriers to equitable participation for students based on academic achievement to satisfy the GEPA requirement.

As a State office, the goal in Indiana is to prevent the elimination or underutilization in the workforce of members of any group on the basis of race or color, religion, nationality, age, gender, or disability. Each State employee has the right to work in a professional atmosphere which promotes equal opportunities regardless of race, sex, religion, age, nationality, sexual orientation, gender identity or disability. The State does not tolerate, condone, or allow any harassment or discrimination whether verbal, physical or environmental.

The State engages in an interactive process to identify reasonable accommodations wherever necessary for all employees or applicants with a known disability. Reasonable accommodations include, but is not limited to:

- Making existing facilities readily accessible and usable;



- Restructuring of a job or service, or of the way in which aid, benefits, services, or training is/are provided;
- Modified work schedules or training schedules;
- Acquisition or modification of equipment or devices;
- Appropriate adjustment or modifications of examinations, training materials, or policies; and
- Provision for readers or interpreters.

The State adult education office also ensures equitable access to, and participation in, all staff projects and activities conducted with federal and State adult education funds.

As an example, the State office previously identified a need for cultural competency specifically in regard to the social, emotional, and academic success of employees and students. Indiana will continually utilize State Leadership funds to provide professional development opportunities, in part, for program staff to address culturally responsive practices to satisfy the GEPA requirement.

Adult Education and Literacy Program Performance Indicators are detailed in Appendix 1 of this section.

DRAFT



Vocational Rehabilitation

Program-Specific Requirements for State Vocational Rehabilitation Services Program: *The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.*

A. State Rehabilitation Council

All VR agencies, except for those that have an independent consumer-controlled commission, must have a State Rehabilitation Council (Council or SRC) that meets the criteria in section 105 of the Rehabilitation Act. The designated State agency or designated State unit, as applicable, has (select A or B):

- A. is an independent State commission.
- B. has established a State Rehabilitation Council

In accordance with Assurance 3(b), please provide information on the current composition of the Council by representative type, including the term number of the representative, as applicable, and any vacancies, as well as the beginning dates of each representative's term.

Council Representative	Current Term Number / Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	1	January, 2023
Parent Training and Information Center	1	January, 2024
Client Assistance Program	1	January, 2024
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	2	January, 2023
Community Rehabilitation Program Service Provider	1	January 2022
Business, Industry, and Labor	1	January, 2022
Business, Industry, and Labor	2	January, 2024
Business, Industry, and Labor	1	January, 2022
Business, Industry, and Labor	vacant	N/A
Disability Advocacy Groups	2	January, 2022
Disability Advocacy Groups	1	January, 2024
Disability Advocacy Groups	1	January, 2024
Current or Former Applicants for, or Recipients of, VR services	2	January, 2023
Current or Former Applicants for, or Recipients of, VR services	1	January, 2024
Current or Former Applicants for, or Recipients of, VR services	1	January, 2024
Current or Former Applicants for, or Recipients of, VR services	1	January, 2024
Current or Former Applicants for, or Recipients of, VR services	1	January, 2024
Section 121 Project Directors in the State (as applicable)	N/A	N/A
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	2	January, 2022
State Workforce Development Board	1	January, 2024



VR Agency Director (Ex Officio)	N/A	July, 2016
Trade Association of I/DD Service Providers (state requirement)	1	January, 2022
State Division of Mental Health and Addiction (Ex Officio- state requirement)	2	January, 2023
State Developmental Disability Services (Ex Officio- state requirement)	1	January, 2024

If the SRC is not meeting the composition requirements in section 105(b) of the Rehabilitation Act and/or is not meeting quarterly as required in section 105(f) of the Rehabilitation Act, provide the steps that the VR agency is taking to ensure it meets those requirements.

The VR Council meets six times each year, with meetings occurring every other month. All seats are currently filled with Governor appointed members, with the exception of one business representative. BRS is actively seeking qualified individuals to fill this seat and will be making a recommendation to the Governor's office for appointment by early 2024.

In accordance with the requirements in section 101(a)(21)(A)(ii)(III) of the Rehabilitation Act, include a summary of the Council's input (including how it was obtained) into the State Plan and any State Plan revisions, including recommendations from the Council's annual reports, the review and analysis of consumer satisfaction and other Council reports.

The VR Council reviewed and discussed the draft State plan on September 8th, 2023, during a council meeting. Commission members were largely supportive of the goals and strategies outlined for the Performance Year (PY) 24-25 VR section of the State Plan. The Council stated that the goals and strategies seemed very comprehensive and aligned with current initiatives as well as noted areas of improvement. The VR Council made some recommendations for further enhancement of the goals. Recommendations are included in the next section.

The Commission also reviewed highlights of performance on prior year State plan goals, order of selection data including a need to continue the order selection partway through PY24, annual estimates, and federal performance indicators including actual performance from PY20-23 as well as estimated performance for PY24 and PY25.

Customer satisfaction survey results are presented to the VR Council at least twice per year, and council members have the opportunity to ask questions and share feedback or suggestions. In July 2023, BRS proposed a modification to the survey process to shift to electronic survey collection and the commission was in support of this, along with the continued availability of alternative options for customers to complete the survey such as working individually with a BRS central office team member to complete the survey verbally or completing a paper survey with a self-addressed stamped return envelope.

Provide the VR agency's response to the Council's input and recommendations, including an explanation for the rejection of any input and recommendations. List each recommendation/input followed by the VR agency response.

Input: The VR Council acknowledged that goals, priorities, and strategies were aligned with topics and areas of growth discussed during commission meetings and from review of VR performance data. No missing areas of focus were identified, however there were a few recommendations as outlined below. The VR Council acknowledged the positive trend in performance on federal



performance indicators and agreed that areas of continued growth include continued increase in median wages and in the number of individuals enrolled in programs that result in post-secondary credentials. The council noted that these two areas are interrelated. The VR Council complimented VR in particular on the postsecondary credential attainment rate achieved for PY22, which is above the average in Indiana for all populations enrolled in training at postsecondary institutions. The VR Council remains supportive of progress toward ending the order of selection and reviewed the timeline around this during several meetings in calendar year 2023, including during the September 8, 2023, meeting as part of the review of the draft State plan.

Recommendation: During discussion on the priorities and strategies pertaining to an increased focus on work-based learning, including on-the-job training (OJT), a recommendation was made for BRS to consider reviewing programs offered across other organizations that are similar to OJT, to explore how other organizations message those services to businesses. The Employment Aid Readiness Network (EARN) was one example suggested.

BRS Response: BRS will review programs such as EARN, Indiana's work study program, to learn how those programs are messaged to businesses. One area of particular interest is messaging these services in a way that does not reduce the employers' perception of the value that participants bring to the place of employment. Applicable information learned will be incorporated into the VR OJT service and communication about the service. This feedback will be incorporated into the process for service delivery on OJT, however, does not result in any changes to the State plan.

Recommendation: Consider expanding the measurement around increasing applicants to VR who are students, by establishing a goal for the percentage of students with disabilities in secondary education (students receiving special education services through an Individualized Education Plan or served through a 504 plan) who apply for VR or pre-employment transition services (pre-ets).

BRS Response: Based on this recommendation, BRS reviewed data shared by the Indiana Department of Education (DOE) to determine a baseline for percentage of students with disabilities who enter VR or pre-ets, and established a goal that supports the increase of students entering into services. A measurement has been added to the goals section of the State plan.

Recommendation: Consider collaborating with other organizations, such as the Governor's Council for People with Disabilities, in hosting educational events during Disability Employment Awareness Month.

BRS Response: BRS would be happy to collaborate with the GCPD or other organizations to identify opportunities to partner on initiatives, including during Disability Employment Awareness month. Section L8 of the VR portion of the State plan was amended to include specific reference to partnership with the GCPD

B. Comprehensive Statewide Needs Assessment (CSNA)

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

1. The VR service needs of individuals with disabilities residing within the State, including:

A. Individuals with the most significant disabilities and their need for Supported Employment

The information presented in this section is based on the most recent comprehensive statewide needs assessment completed in 2022, with relevant updates. The next CSNA has begun and will be completed by early 2025 and incorporated in the next State plan amendment.

The Rehabilitation Act, as amended by the Workforce Innovation and Opportunity Act (WIOA) requires Vocational Rehabilitation State agencies to conduct a comprehensive statewide needs assessment every three years. The needs assessment included review of data on the general population in Indiana as well as data on individuals being served in the Indiana VR program. A survey was also conducted to gather input from individuals with disabilities and their families, stakeholders, employers, VR staff and others regarding the needs of individuals with disabilities in Indiana, particularly as they pertain to employment and transition services. Feedback was also obtained on an ongoing basis through the Commission on Rehabilitation Services, regular VR staff meetings, the VR Employment Advisory Group, The Transition Advisory Group, The Mental Health and Employment Taskforce, and a variety of workgroups with stakeholders. The comprehensive statewide needs assessment established VR program priorities for the next three years, fiscal year 2022-2024.

Indiana's 2022 comprehensive statewide needs assessment reflects a synthesis of quantitative and qualitative data addressing the state's overall vocational rehabilitation needs.

Data highlights from the full CSNA include a breakdown of individuals served in VR by disability service priority category:

Service Priority Category	FFY 2019		FFY2020		FFY2021	
Priority Category 1: Most Significant Disability	8,889	81.9%	8,636	87.7%	8,448	90.6%
Priority Category 2: Significant Disability	1,798	16.6%	1,120	11.4%	792	8.5%
Priority Category 3: All Other VR Eligible Individuals	163	1.5%	88	.9%	83	.9%

The percentage of individuals (most significant disability) served in priority category one has increased significantly, representing over 90% of total individuals served in FFY2021 compared to 42.6% in FFY2016.

The CSNA survey instrument presented questions about the needs of individuals with the most significant disabilities and who might need supported employment to keep a job. Relevant survey questions and responses are outlined below:

Do you know that VR can provide supported employment services for up to 24 months?

59.45% of combined respondents indicated 'yes' with 40.55% answering 'no.' 52.86% of individuals with disabilities indicated 'yes' with 47.14% answering 'no.' This indicates that over half of the respondents were aware that VR can provide supported employment services for up to 24 months.

What employment barriers exist for individuals with the most significant disabilities?

Highest reported barriers by combined respondents:



1. Employers' willingness to hire individuals needing significant support	22.09%
2. Transportation (example: cannot drive, bus not reliable)	15.23%
3. Expectations of employers about individuals with disabilities working	13.81%
4. Not enough employment specialists or job coaches	10.73%
5. Expectations of professionals about individuals with disabilities working	9.10%

Highest reported barriers by respondents reporting as a person with a disability:

1. Employers' willingness to hire individuals needing significant support	22.95%
2. Expectations of employers about individuals with disabilities working	16.17%
3. Expectations of professionals about individuals with disabilities working	13.57%
4. Transportation (example: cannot drive, bus not reliable)	11.73%
5. Not enough employment specialists or job coaches	7.99%

A notable difference between the two groups is that individuals with disabilities ranked expectations of both employers and professionals as higher barriers compared to combined respondents. Combined respondents ranked transportation and not enough employment specialists as higher barriers compared to respondents with disabilities.

What would improve employment services and outcomes for individuals with the most significant disabilities?

Highest reported needed improvements by combined respondents:

1. Education to employers about the value of hiring individuals with disabilities	20.72%
2. Additional opportunities for work experience	19.76%
3. Targeted efforts to transition individuals out of subminimum wage employment (sheltered workshops) and into competitive, integrated employment	13.32%
4. Additional training to employment specialists and job coaches	11.60%
5. Additional opportunities for career exploration	10.04%

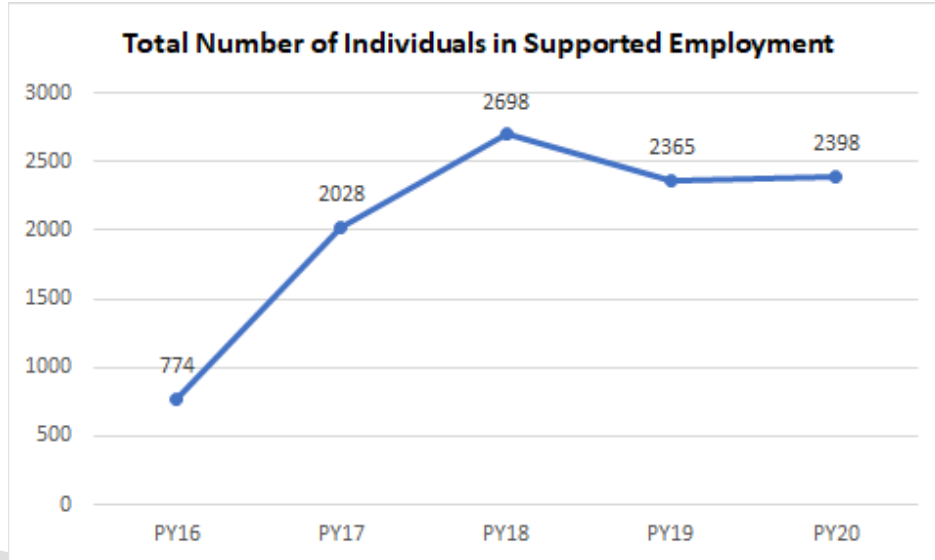
Highest reported needed improvements by respondents reporting as a person with a disability:

1. Education to employers about the value of hiring individuals with disabilities	21.68%
2. Additional opportunities for work experience	18.95%
3. Targeted efforts to transition individuals out of subminimum wage employment (sheltered workshops) and into competitive, integrated employment	12.96%
4. Additional training to employment specialists and job coaches	12.70%
5. Additional opportunities for career exploration	10.03%

Responses were very similar across both groups.

BRS also continued to support Establishment projects for several VR employment services providers through March 2021. The purpose of these projects was to increase provider capacity and training to serve VR participants, particularly those with the most significant disabilities. The CSNA includes outcomes from these projects including outcomes pertaining to the provision of supported employment services. Some *highlights are as follows:

Number of Individuals in Supported Employment



PY16	PY17	PY18	PY19	PY20
774	2,028	2,698	2,365	2,398

**The establishment project data does not represent all VR participants or all VR providers. This data represents supported employment data for participants served by a subset of VR providers.*

In PY16, the reported baseline number of individuals in supported employment was 774, a statewide average of 19 per contracted establishment provider. This number significantly increased to 2,028 in PY17, resulting in a statewide average of 51, with a 162% increase. In PY18, the number of individuals in supported employment again increased to 2,698, resulting in a statewide average of 67, with a 33% increase. When comparing activity for the first two years of the Establishment projects, PY16 to PY18 resulted in a 249% increase in the number of individuals in supported employment.

The overall metric for this performance measure was a 30% increase in the number of individuals receiving VR-funded supported employment or on-the-job supports short-term by end of year 2 (PY18), and therefore, the statewide sum in both program years by far surpassed the required end of year 2 metric. The results of both program years were a significant accomplishment as supported employment services were underutilized in prior years. As a result of the Establishment projects, community rehabilitation programs devoted more time in the provision of supported employment services to assist VR participants in achieving stabilization and successful job retention.

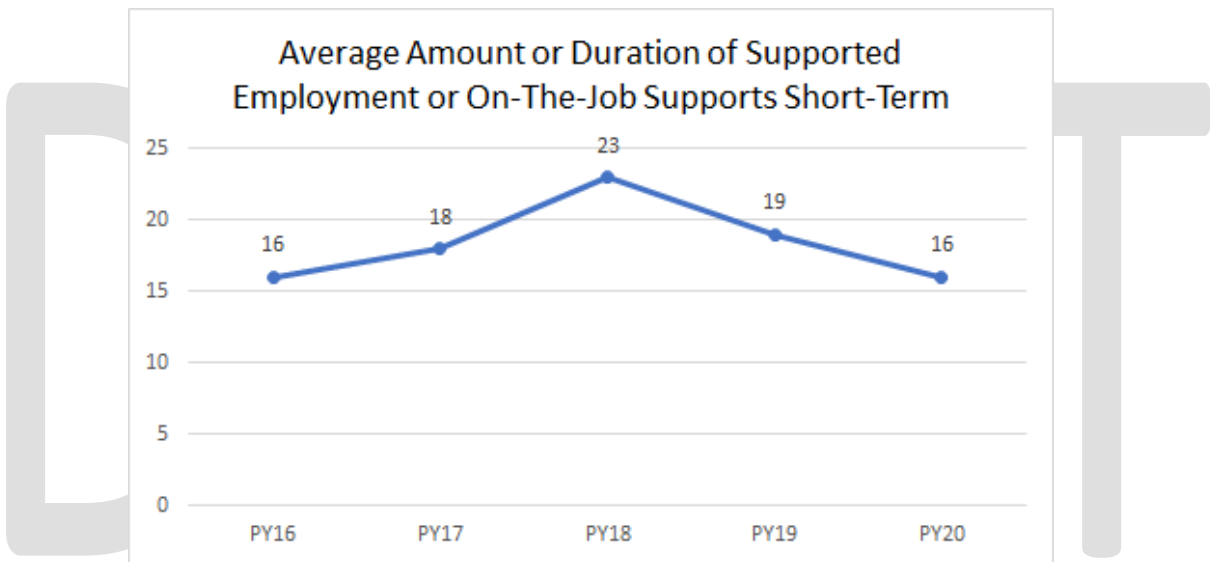
In PY19, the reported number of individuals in supported employment was 2,365, a statewide average of 74, with a 27% increase. In PY20, this number slightly increased to 2,398, a statewide average of 75, with a 1% increase from PY19. When comparing activity for the remaining two years of the Establishment projects, increased supported employment utilization from PY18 to PY20 was a 29% increase in the number of individuals in supported employment.

The overall metric for the two final years was at least a 10% increase in the number of individuals receiving VR-funded supported employment or on-the-job supports short-term by end of year 3 (PY19) and an additional 10% increase by end of year 4 (PY20). PY19 met the overall metric for this

performance measure; however, PY20 did not meet the additional 10% metric increase, largely contributed to COVID-19.

Again, even though the results differ from the first two years of the Establishment projects, and the overall metric wasn't met in year 4, the results still indicate that community rehabilitation programs are focused on utilizing supported employment, with more than a 200% increase in the number of individuals receiving supported employment services from baseline to end of the project period. As a result of the Establishment projects, community rehabilitation programs devoted more time providing supported employment services to assist VR participants in achieving stabilization and successful job retention.

Average Number of Hours for the Amount or Duration of Supported Employment or On-The-Job Supports Short Term, Per Person



PY16	PY17	PY18	PY19	PY20
16	18	23	19	16

As indicated above, the data does not represent all VR participants or all VR providers. This data represents supported employment data for participants served by a subset of VR providers.

In PY16, the baseline reported number of average hours spent on supported employment services or on-the-job supports short-term, per person, was 658, resulting in a statewide average of 16 hours. In PY17, the sum increased to 710, a statewide average of 18 hours, with an 8% increase. In PY18, the sum increased to 922, a statewide average of 23, with a 30% increase. When comparing activity for the first two years of the Establishment projects, PY16 to PY18 resulted in a 40% increase in the number of average hours spent on supported employment services or on-the-job supports short-term provided, per person.

The project metric was met, as the goal was a 30% increase in the amount or duration of supported employment services or on-the-job supports short-term that participants received by end of year 2. Through the Establishment project, it is clear that community rehabilitation programs devoted



more time providing supported employment services to assist VR participants with achieving stabilization and successful job retention.

In PY19, the reported number of average hours spent on supported employment services or on-the-job supports short-term, per person, was 603, resulting in a statewide average of 19 hours, with an 8% decrease from the baseline. In PY20, the sum slightly decreased to 522, a statewide average of 16 hours, with a 13% decrease from PY19.

The overall metric for year 3 (PY19) was a 10% increase in the amount or duration of supported employment or on-the-job supports short-term, per person, and an additional 10% increase by end of year 4 (PY20). Neither of the goals were met in PY19 or PY20, which is likely largely contributed to COVID-19. Not only was participants' employment impacted by the pandemic as shared previously, but providers also reported increased difficulty with staff retention and recruitment during this time. Some VR participants were also asked to pause services for a period of time due to the pandemic.

B. Individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the VR program

Data highlights from the full CSNA include a breakdown of individuals served in VR by race/ethnicity.

Race/Ethnicity	FFY 2019		FFY2020		FFY2021	
American Indian or Alaska Native	139	1.4%	142	1.4%	123	1.2%
Asian	113	1.2%	131	1.3%	125	1.2%
Black or African American	1,406	14.4%	1,493	14.7%	1,468	14.6%
Does Not Wish to Identify	4	.0%	19	.2%	39	.4%
Hispanic or Latino	341	3.5%	349	3.4%	361	3.6%
Middle Eastern	31	.3%	39	.4%	42	.4%
Native Hawaiian or Other Pacific Islander	27	.3%	35	.3%	33	.3%
White	7,711	79.1%	7,969	78.3%	7,870	78.2%

**Numbers are duplicated as individuals may be counted in more than one category, therefore the total for all percentages may equal more than 100%.*

In FFY21, the majority of individuals served in VR (78.2%) were white, with the second largest population at 14.6% who were individuals who are Black or African American. The percent of individuals who are white has decreased slightly over the last few years (79.8% in FFY18), while the percent of individuals who are Black or African American has increased slightly (14.1% in FFY18). For comparison, the below data compares total individuals served by race/ethnicity in VR compared to the Indiana population of individuals with disabilities by race/ethnicity.

Indiana Disability Population by Race and VR Participants Served by Race

Indiana	Number of People with a Disability (all ages)	*Percentage of Disability Population	Served by VR PY 2020 (ages over 14)	Percentage of VR Participants



		by Race/ Ethnicity		Served by Race
Total for Indiana	894,735 (13.5% of the total population)		12,284	
Race				
White	764,451	85.4%	10,323	84.0%
African American	84,964	9.5%	1,946	15.8%
American Indian/Alaska Native	N	N	168	1.4%
Asian	8,576	<1%	154	1.3%
Other race(s)	31,203	3.5%	351	2.9%
Ethnicity				
Hispanic or Latino (of any race)	34,758	3.9%	463	3.8%

*Calculated by dividing number of people in each race/ethnicity category by total count of people with a disability in Indiana.

- Census Table Results:
<https://data.census.gov/table?q=Indiana%20Disability%20population>
- ETA 9169 PY 2020 (Indiana Rehabilitation Federal Report):
<https://rsa.ed.gov/sites/default/files/publications/annual-reports/2020/ETA-9169%20AnnualReport-PY2020%20IN.pdf>

Proportionally, VR serves a higher percentage of individuals who are African American and individuals who are Asian compared to the total Indiana disability population; conversely, a slightly lower percentage of individuals who are white, and individuals of other races.

The following is a summary of survey questions and responses in regard to services for minorities

What racial/ethnic groups are unserved or underserved?

Highest reported unserved/underserved racial/ethnic groups by combined respondents:

1. African American or Black	24.14%
2. Hispanic or Latino	21.10%
3. Multi-Racial	10.29%

Highest reported unserved/underserved racial/ethnic groups by respondents reporting as a person with a disability:

1. African American or Black	23.27%
2. Hispanic or Latino	18.81%
3. Caucasian	10.23%

Both groups ranked African American or Black and Hispanic or Latino as the two most unserved or underserved racial or ethnic groups, however combined respondents ranked multi-racial as the third most underserved or underserved racial or ethnic group, while respondents with disabilities ranked Caucasian as their third underserved or unserved racial or ethnic group.



What would improve services for racial/ethnic minority groups?

Highest reported needed improvements by combined respondents:

1. Increased outreach about available programs and services	20.31%
2. Diversity, equity, and inclusion training for staff	16.47%
3. Ways to address language barriers	16.47%
4. Improved transportation options	15.08%
5. Access to peer mentors	11.95%

Highest reported needed improvements by respondents reporting as a person with a disability:

1. Increased outreach about available programs and services	19.74%
2. Diversity, equity, and inclusion training for staff	17.29%
3. Ways to address language barriers	15.07%
4. Improved transportation options	13.79%
5. Access to peer mentors	12.03%

Responses were very similar across both groups.

The following is a summary of survey questions and responses in regard to unserved or underserved populations:

Who is not being served well enough?

Highest reported responses by combined respondents:

1. Individuals with mental health conditions	13.40%
2. Individuals with the most significant disabilities (need more support to get and keep a job)	13.09%
3. Individuals with intellectual and developmental disabilities	7.95%
4. Individuals with autism	7.75%
5. Individuals residing in rural areas	7.40%

Highest reported responses by respondents reporting as a person with a disability:

1. Individuals with mental health conditions	13.18%
2. Individuals with the most significant disabilities (need more support to get and keep a job)	12.27%
3. Individuals with disabilities pursuing career paths and advanced degrees	7.58%
4. Individuals with intellectual and developmental disabilities	5.78%
5. Individuals with traumatic brain injuries	5.60%
6. Individuals who are Deaf or hard of hearing	5.60%

While both groups reported individuals with mental health diagnosis and individuals with the most significant disabilities as the top two populations not being well enough, respondents with disabilities included individuals pursuing career paths and advanced degrees, individuals with traumatic brain injury, and individuals who are Deaf or hard of hearing as top populations not being served well enough. Combined respondents included individuals with autism and individuals residing in rural areas as top populations not being served well enough.



What would improve services for the underserved populations you selected in the previous question?

Highest reported improvements by combined respondents:

1. Increased outreach about available programs and services	21.60%
2. Improved transportation options	20.46%
3. Increased training for employment specialists or job coaches	14.38%
4. Diversity, equity, and inclusion training for staff	13.06%
5. Ways to address language barriers	9.27%

Highest reported improvements by respondents reporting as a person with a disability:

1. Increased outreach about available programs and services	20.21%
2. Improved transportation options	17.75%
3. Diversity, equity, and inclusion training for staff	15.54%
4. Increased training for employment specialists or job coaches	11.40%
5. Review of policies and practices to ensure equitable access to services	11.14%

Respondents with disabilities ranked diversity, equity, and inclusion training for staff above increased training for employment specialists or job coaches, in contrast to combined respondents. Respondents with disabilities included review of policies and practices to ensure equitable access in their top 5, while combined respondents did not. Combined respondents included ways to address language barriers in their top 5, while respondents with disabilities did not.

C. Individuals with disabilities served through other components of the workforce development system

The Department of Labor (DOL) December 2021 disability employment statistics reports the following for individuals ages 16 and over:

Labor Force Participation

- People with disabilities: 22.3% (increase from 20.5% in 2020)
- People without disabilities: 67.2% (increase from 67.1% in 2020)

Unemployment Rate

- People with disabilities: 7.9% (decrease from 12.6% in 2020)
- People without disabilities: 3.5% (decrease from 7.9% in 2020)

Note: Labor Force participation refers to the percentage of the population who are working or looking for work while the Unemployment Rate is the number of unemployed people as a percentage of the labor force.

The Wagner-Peyser National Quarterly report for 2020 (DOL, March 2021) showed that 192,419 individuals with disabilities received services from Wagner-Peyser. Services to individuals with disabilities are 5.3% of the total served.

The survey addressed a few questions about partnerships with the statewide workforce development system (i.e., Work One Centers).



How can VR and other Indiana workforce programs (example: Work One, Adult Education) support increased access to workforce services for people with disabilities?

Highest reported responses by combined respondents:

1. Increase communication about available programs and services	22.17%
2. Coordinating services among multiple partners	17.50%
3. Disability awareness training	14.87%
4. Making the referral process between workforce programs easier	13.50%
5. Increased VR presence in Work One Centers	11.05%

Highest reported responses by respondents reporting as a person with a disability:

1. Increase communication about available programs and services	20.95%
2. Disability awareness training	16.53%
3. Coordinating services among multiple partners	15.68%
4. Making the referral process between workforce programs easier	12.00%
5. Cross-training of staff	11.37%

Respondents with disabilities ranked a need for disability awareness training higher than combined respondents. One other difference between the two groups is that combined respondents ranked increased VR presence in Work One Centers in their top 5 responses, while individuals did not. Additionally, respondents with disabilities ranked cross-training of staff in their top 5 responses, while combined respondents did not.

What are positive things that are happening between Work One and VR?

This was an open-ended survey question. Respondent comments varied widely across the State. Noted positives include increased communication between Work One and VR staff, increased availability of a variety of training programs at the Work One Centers, availability of VR staff in the Work One Centers, and VR presence on Workforce Development Boards, coalitions, etc. In many areas the cross-training of staff in both agencies on programs and services was noted positives along with the cross-referral process resulting in improved communication and collaboration.

What opportunities do you see for increased collaboration among workforce programs to improve employment outcomes for individuals with disabilities?

This was an open-ended survey question. Common feedback regarding improving employment outcomes were comments pertaining employer buy-in to disability hiring. Expansion of services such as work experience, job shadowing, externship, mentoring, job fair participation, networking with HR representatives, and the development of secondary school education to work programs were identified. Employers indicated a continuing need for resources and guidance in job site accommodations, disability awareness, building basic employment skills to include independent living, and the availability of post-hire support services.

Additional areas identified by respondents included continuing efforts to improve communication, cross-training of VR and Work One Center staff, VR staff embedded in Work One Centers, and transportation barriers statewide



D. Youth with disabilities, including students with disabilities and their need for pre-employment transition services. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under IDEA.

2021 data from the U.S. Department of Labor shows the following labor force participation and unemployment rate for youth:

Labor Force Participation for Youth:

- Age 16-19 with Disability: 24.3%
- Age 16-19 with No Disability: 36.8%
- Age 20-24 with Disability: 46.7%
- Age 20-24 with No Disability: 72%

Unemployment Rate for Youth:

- Age 16-19 with Disability: 21.1%
- Age 16-19 with No Disability: 11.4%
- Age 20-24 with Disability: 16.5%
- Age 20-24 with No Disability: 8.7%

Data highlights from the CSNA pertaining to services to youth and students are provided below:

Total Individuals Served: Age

	FFY2019	FFY2020	FFY2021
14-20 years	.5%	2.3%	7.0%
20-30 years	43.5%	44.5%	42.9%
30-40 years	16.6%	16.6%	16.4%
40-50 years	13.2%	13.2%	12.6%
50-60 years	15.6%	14.2%	13.5%
60-70 years	8.8%	7.6%	6.4%
70+ years	.11%	1.54%	1.13%

Nearly half of all individuals served were 30 years of age or younger with a continued drop in individuals aged 40-70 served. The increased focus on serving students through Pre-ETS could be contributing to the increase in this younger population served in VR.

VR Eligible and Potentially Eligible Students Served Through Pre-ETS

	VR eligible and received Pre-ETS	Potentially eligible Pre-ETS only (no VR IPE)	Total students received Pre-ETS
PY2019	244	4,184	4,428
PY2020	546	3,871	4,417
PY2021	Not yet available	Not yet available	Not yet available

Over 4,000 students with disabilities received services during PY19 and PY20. The majority of students who received Pre-ETS in both years were those potentially eligible students who were not yet receiving VR services under an IPE.



The following is a summary of survey questions and responses in regard to youth and students with disabilities:

What are the biggest barriers students with disabilities have when making the transition from school to work?

Highest reported barriers by combined respondents:

1. Transportation (example: cannot drive, bus not reliable)	12.50%
2. Gap in services from school to work (student leaves school without connections to services)	11.35%
3. Employers' willingness to hire individuals needing significant support	10.86%
4. Concerns of individual or family about loss of benefits (examples: Social Security, Medicare, Medicaid, housing assistance)	9.90%
5. Lack of information or confusion about available services	9.51%

Highest reported barriers by respondents reporting as a person with a disability

1. Employers' willingness to hire individuals needing significant support	12.51%
2. Expectations from professionals about individuals with disabilities working	11.97%
3. Transportation (example: cannot drive, bus not reliable)	10.50%
4. Concerns of individual or family about loss of benefits (examples: Social Security, Medicare, Medicaid, housing assistance)	9.88%
5. Gap in services from school to work (student leaves school without connections to services)	9.65%

While reported barriers were similar across both groups overall, of note is that respondents with disabilities reported expectations from professionals about individuals with disabilities working as the 2nd highest barrier, and this was not included in the top five barriers for combined respondents. Also of note is that while transportation was ranked as the top barrier by combined respondents, both employers' willingness to hire individuals needing significant support and expectations from professionals ranked as higher barriers than transportation by respondents with disabilities.

What are the needs of students with disabilities as they transition to employment and/or post-secondary education?

Highest reported needs by combined respondents:

1. Skills to get ready for work and independent living	26.89%
2. Work experience, internships	23.85%
3. Self-advocacy and self-determination skills	19.22%
4. Job exploration counseling	17.73%
5. Counseling on post-secondary education programs	10.01%

Highest reported needs by respondents reporting as a person with a disability:

1. Skills to get ready for work and independent living	24.95%
2. Work experience, internships	23.82%
3. Self-advocacy and self-determination skills	21.00%
4. Job exploration counseling	16.57%



5. Counseling on post-secondary education programs	10.55%
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Responses were very similar across both groups.

What would improve VR services for students and youth with disabilities?

1. Additional opportunities for work experience	17.17%
2. Increased knowledge of resources and opportunities that support employment	15.39%
3. Better coordination between VR and schools	15.15%
4. Earlier access to VR services	12.23%
5. Additional opportunities for career exploration	10.64%

Highest reported needed improvements by respondents reporting as a person with a disability:

1. Additional opportunities for work experience	18.43%
2. Increased knowledge of resources and opportunities that support employment	15.93%
3. Better coordination between VR and schools	14.30%
4. Additional opportunities for career exploration	12.58%
5. Earlier access to VR services	11.89%

Responses by both groups were similar, except respondents with disabilities ranked additional opportunities for career exploration as a higher area of improvement v. earlier access to VR, in contrast to combined respondents.

How can employers be more involved with helping students and youth with disabilities transition to work and/or post-secondary education?

Highest reported responses by combined respondents:

1. Provide more work experiences/internships	24.72%
2. Increase their awareness of employment resources and supports (example: Vocational Rehabilitation, job coaching, accommodations)	24.08%
3. Mentor students and youth	16.65%
4. Provide job fairs at schools (mock interviews/application practice)	15.04%
5. Offer tours at business sites	9.28%

Highest reported responses by respondents reporting as a person with a disability:

• Increase their awareness of employment resources and supports (example: Vocational Rehabilitation, job coaching, accommodations)	24.49%
• Provide more work experiences/internships	21.73%
• Mentor students and youth	17.81%
• Provide job fairs at schools (mock interviews/application practice)	13.71%
• Offer tours at business sites	10.06%

Responses by both groups were similar, except combined respondents ranked increased work experience/internships as a higher need v. increased awareness of employment resources and support, in contrast to respondents with disabilities.



According to the Indiana Department of Education (DOE) “Memorandum to State Board of Education Regarding Child Counts” for December 1, 2020, there was a non-duplicated child count of 169,169 students in special education. This is down from the year before by 22 students (-.013%). The breakdown according to disability is shown in the chart below.

Child Count Comparisons (December 2, 2019, and December 1, 2020), Ages: 5B (kindergarten eligible)-22- Unduplicated State Totals by Disability²⁰

Primary Exceptionality Category	December 2019 Count	December 2020 Count	Increase/Decrease
Multiple Disability	1,961	1,862	-99
Orthopedic Impairment	1,378	1,301	-77
Blind or Low Vision	924	914	-10
Deaf or Hard of Hearing	2,293	2,303	10
Emotional Disability- Full Time	6,766	6,422	-344
Emotional Disability - All Other	6,019	5,857	-162
Specific Learning Disability	54,379	53,106	-1,273
Developmental Delay (Ages 5B-8}	5,187	7,807	2,620
Language/Speech Impairment	33,170	32,895	-275
Mild Cognitive Disability	9,417	8,979	-438
Moderate Cognitive Disability	3,336	3,202	-134
Severe Cognitive Disability	308	270	-38
Deaf Blind	28	26	-2
Autism Spectrum Disorder	16,413	16,281	-132
Traumatic Brain Injury	429	403	-26
Other Health Impairment	27,183	27,541	358
Total Unduplicated Count	169,191	169,169	-22 (-.013%)

The following is information as to Indiana’s progress in meeting the Federal Indicators for IDEA in 2019, (LEAD, n.d.):

- 24.17% of youth no longer in secondary school had IEPs in effect at the time they left school and were enrolled in higher education within one year of leaving high school (Indicator 14a).
- 64.33% of youth who are no longer in secondary school had IEPs in effect at the time they left school and were enrolled in higher education or competitively employed within one year of leaving high school (Indicator 14b).
- 75.83% of youth who are no longer in secondary school had IEPs in effect at the time they left school and were enrolled in higher education or in some other postsecondary education or training program; or they were competitively employed or in some other employment within one year of leaving high school (Indicator 14c). (M. Oja personal communication, December 18, 2021).

²⁰ Source: DOE-Special Education and DOE-Special Education for Voucher Students



With the advent of the Workforce Innovation and Opportunity Act (WIOA), VR agencies must earmark 15% of federal VR funds for the provision of Pre-Employment Transition Services (Pre-ETS) to students with disabilities. Students with disabilities is defined as students in secondary or postsecondary school between the ages of 14 through the school year in which the student becomes 22, who are eligible for, and receiving, special education or related services under Part B of the Individuals with Disabilities Education Act or is an individual with a disability for purposes of Section 504 of the Rehabilitation Act. Students may be eligible for and receiving VR services, or they may be “potentially eligible.” VR considers a potentially eligible student to be a student with a disability as defined above who is not currently receiving VR services under an Individualized Plan for Employment (IPE).

Indiana provides Pre-ETS to students with disabilities in all 92 counties through both contracted community rehabilitation programs and internal VR staff. Both students who are eligible for VR services as well as those potentially eligible for VR services receive Pre-ETS. Over 7,000 students, served by 12 contracted providers, received pre-ETS through the program year ending June 2021.

Additionally, Pre-ETS contracts were amended in the fall of 2021 to align contractors’ updated budget estimates with actual contract budgets to assist VR in reaching their 15% pre-ETS required spend. Additionally, stipends for students participating in certain work-based learning activities were added to contracts to encourage more student involvement in work-based learning, which is a clear predictor of post high school success.

The number of students served through Pre-ETS and type of Pre-ETS activities received is outlined in the tables below.

VR Eligible and Potentially Eligible Students Served Through Pre-ETS

	VR eligible and received Pre-ETS	Potentially eligible Pre-ETS only (no VR IPE)	Total students received Pre-ETS
PY2019	244	4,184	4,428
PY2020	546	3,871	4,417
PY2021	632	7,585	8,217

Over 4,000 students with disabilities received services during PY19 and PY20, with a significant increase to over 8,000 students in PY21. The majority of students who received Pre-ETS in both years were those potentially eligible students who were not yet receiving VR services under an IPE. There may be a need to implement strategies to increase the number of students receiving pre-ets who apply for VR services.

In 2019, Indiana created eight VR Youth Counselor positions to assist with pre-employment transition services (pre-ETS) and general transition outreach to students, families, schools, and providers. They completed local area needs assessments to better understand availability of and access to pre-ETS, develop methods of expanding pre-ETS, improve relationships among VR, schools, and providers, and determine the technical assistance and training needs of schools, providers, and VR staff. These assessments led to our youth counselors bringing pre-ETS to more school systems throughout the State, assisting with training of pre-ETS career coaches, and providing community and business outreach to increase work-based learning activities and strengthen overall programming for students with disabilities. Additionally, youth counselors act as



liaisons between local education agencies and Vocational Rehabilitation, working on improving referrals processes, attending case conferences, and assisting schools and VR with understanding each other's systems to improve outcomes for transition aged youth.

2. Identify the need to establish, develop, or improve community rehabilitation programs within the State.

VR is exploring other targeted needs related to the establishment, development, or improvement of CRPs, which may include increasing capacity and skills needed to successfully serve VR participants, including those who need supported employment services, serving those mental health conditions, serving those working to transition from sub-minimum wage employment to competitive, integrated employment, or other populations. BRS plans to enter into a contract with an entity to provide training and technical assistance to VR employment service providers for the improvement of CRPs. This will include opportunities for one-on-one provider training and technical assistance, tailored to the specific areas of growth for each provider.

Update for PY24-25 State plan: BRS plans to enter into a contract with an entity to provide training and technical assistance to VR employment service providers for the improvement and expansion of CRPs. This will include opportunities for one-on-one provider training and technical assistance, tailored to specific areas of improvement, such as purposeful discovery activities, career pathways, and supported employment services. BRS is evaluating specific needs of CRPs and identifying strategies that can be carried out through establishment projects to ensure CRPs have access to essential training, including employment specialist training that is ACRE certified. BRS is also identifying strategies for utilization of establishment projects to support CRP expansion, including opportunities for some CRPs to grow their employment programs in order to serve more VR participants.

The complete CSNA can be viewed at <https://www.in.gov/fssa/ddrs/files/CSNA-Jan-2022.pdf>.

C. Goals, Priorities, and Strategies

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under section 107 of the Rehabilitation Act. VR agencies must:

1. Describe how the SRC and the VR agency jointly developed and agreed to the goals and priorities and any revisions

Goals, outcomes, and priorities were reviewed and discussed with the State Rehabilitation Council during a September 8, 2023, council meeting, providing an opportunity for input and recommendations. Information was provided to the VR Council for review in advance of the meeting. The council agreed with the goals and priorities outlined in 2D and commented that they were very comprehensive and aligned with initiatives and identified areas of improvement. The VR Council did not identify any goals and priorities that were missing. There was a recommendation to expand up on the measurement for the percentage of students with disabilities entering into VR, including the use of DOE data to set a goal for the percentage of students with disabilities who enter VR or pre-ets. An additional measure was added to include this recommendation.



2. Identify measurable goals and priorities in carrying out the VR and Supported Employment programs and the basis for selecting the goals and priorities (e.g., CSNA, performance accountability measures, SRC recommendations, monitoring, other information). As required in section 101(a)(15)(D), (18), and (23), describe under each goal or priority, the strategies or methods used to achieve the goal or priority, including as applicable, description of strategies or methods that:

A. Support innovation and expansion activities

The Innovation and Expansion authority is utilized to support the Indiana State Independent Living Council (INSILC), as well as new and innovative initiatives that open the door for new employment opportunities for individuals with disabilities and/or increase opportunities for those with the most significant disabilities. This includes continued investment in VR's Business and Community Engagement Team to lead business outreach efforts for the VR program and serve as an initial point of contact for businesses, facilitating necessary connections with resources and partners. The team also provides technical assistance to local VR field offices on effectively working with businesses, including supporting enhanced opportunities for on-the-job training or other work-based learning for VR participants. Partnership and strong collaboration with community stakeholders and employers continues to result in networking events that facilitate the connection of employers directly to VR participants who are seeking employment.

B. Overcome barriers to accessing VR and supported employment services

BRS continues to partner with the Arc of Indiana and Self-Advocates of Indiana to provide career counseling and information and referral services (CCIR) to individuals employed at subminimum wage. CCIR services were originally provided largely in a group setting format, however as of July 2023, CCIR services have shifted to a one-to-one approach. Individual CCIR provides the opportunity to tailor services to individuals. Attendees receive information about local resources regarding employment services and other-related information; discuss potential competitive, integrated employment opportunities and ways to learn more about a new career field (i.e., informational interviewing or job-shadowing); and discuss the importance of seeking assistance and guidance from a support network, such as family members or friends. Attendees receive a certificate of participation documenting completion of the CCIR activities.

VR recognized individuals with mental health disabilities as an underserved population as outlined in both the 2019 and 2022 CSNAs in terms of the effectiveness of services and achievement of employment outcomes. A dedicated workgroup was established in 2019 comprised of representatives from VR, DMHA, CMHCs, NAMI, Key Consumer Organization, the Indiana Mental Health Council, and individuals with lived experience. DMHA and VR collectively sought and received an opportunity for training and technical assistance through ODEP, securing two rounds of training and TA. The project is focused on capacity building to improve competitive, integrated employment outcomes for individuals with mental health disabilities, including supporting two early adopter Individual Placement and Support (IPS) sites since late 2021 with plans for expansion in early 2024.

The reduced capacity of VR employment service providers has led to new challenges with access to employment services, including supported employment services. Many providers have implemented wait lists for services which have delayed service provision and may have impacted customer engagement. BRS has implemented several strategies to mitigate this challenge, including a rate increase in April 2022 and implementation of performance incentive payments in July 2023. VR has also initiated a virtual job club, led by VR staff, to better engage participants and provide



options for guided, self-directed career exploration. VR also contracted with nine Navigators to support VR participants in accessing services from other workforce programs, as services through local Work One offices have historically been underutilized by VR participants but may offer great value, particularly in light of provider capacity challenges

C. Improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, post-secondary education, employment, and pre-employment transition services)

Youth VR Counselors have developed relationships with businesses at their local level to improve services for transition aged youth by increasing the number of work-based learning experiences available to pre-ETS students and other youth. BRS has a dedicated youth services director, a youth services associate director, and 10 youth counselors located throughout the State, who have worked to expand and improve relationships with key transition stakeholders. The director facilitates the VR Transition Advisory Council, engaging in one-on-one conversations, and presenting and educating various stakeholder groups about VR and pre-employment transition services, including having youth counselors present at each advisory council meeting on pre-ETS and other transition related initiatives in their regions. The Transition Advisory Council has been instrumental in increasing outreach and education related to transition aged youth. Specifically, collaboration with representatives from PCG, DOE, and DWD on the council has aided in outreach to school systems, training of educators on transition, VR, and Pre-ETS, and services available to transition-aged youth through DWD and other sources.

Furthermore, the 10 VR youth counselors have completed and continue to update maintenance and expansion plans with local schools, providers, and VR offices to identify best practices and gaps in services, have helped to facilitate improved relationships at the local level between VR and schools, and have worked with VR's Director of Youth Services to outline recommended best practices and improved strategies for VR transition efforts. These staff are discussed in greater detail throughout the VR section of the State plan.

D. Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes. List and number each goal/priority, noting the basis, and under each goal/priority, list, and number the strategies to achieve the goal/priority.

Goal 1: Improve VR participant engagement and participation

Priority 1.1: Rapid and quality engagement of individuals

Basis: Data from the VR-Technical Assistance Center for Quality Management, funded by RSA, indicates that a shorter turnaround time from application to eligibility and IPE leads to a higher rate of rehabilitation. Additionally, there has been little improvement in reducing the percentage of eligible individuals exiting the VR program prior to IPE or after IPE without employment. In PY22 quarter 4, of all exits from VR, 17% exited after eligible and before IPE, and 43.6% exited after IPE but prior to obtaining an employment outcome (data source: RSA dashboard reports). This attrition rate negatively impacts the overall employment outcomes for the VR program. Furthermore, while many positive comments are received through customer satisfaction surveys, one concerning theme has been dissatisfaction with the length of time it takes to receive services for some individuals.



- Strategy 1.1a: Decrease time from application to eligibility. Average days from application to eligibility will average 30 days or less by the end of the State plan period. (PY22 baseline: 36.02; data source: Aware and Tableau dashboards).
- Strategy 1.1b: Review processes to identify opportunities to streamline or modernize, such as provision of specific services including hearing aid devices, and opportunities for increased efficiency with information technology systems. Implement at least 2 strategies each year during the State plan period.
- Strategy 1.1c: Explore opportunities for streamlining application or eligibility determination processes with other agencies, including Bureau of Disability Services (BDS) and Division of Mental Health and Addiction (DMHA). Identify and implement at least two strategies during the State plan period.
- Strategy 1.1d: Continue to focus training efforts to VR Counselors on the importance of quality interactions with participants. Training or technical assistance related to this topic area will be provided at least twice per year during the State plan project period, such as technical assistance provided in regional staff meetings, Friday field chats, or statewide training opportunities.

Priority 1.2: Serve all eligible individuals

Basis: BRS has been operating under an order of selection since August 2017 and has retained a goal of opening all service categories and ending the order of selection. This goal remains a priority so that all eligible individuals can receive services. This will not only benefit eligible individuals in need of VR services, but may also contribute to improved trends in the number of individuals receiving services and exiting with employment.

- Strategy 1.2a: Continue quarterly order of selection waitlist releases until all eligible individuals on the wait list are offered services. All service priority categories will be open by December 2024.

Priority 1.3: Increase participation of students and youth in the VR program

Basis: There has been a decline in the percent of VR participants served who are students and youth (age 24 and younger) with disabilities from 48% in the fourth quarter of PY20 to 39% in the fourth quarter of PY22 (data source: RSA dashboard report). This could have been impacted by the growth in the number of students served in pre-ets from PY 20 to PY22, but remains an area of needed improvement. Additionally, only 9% of students receiving pre-ets are applying for VR services as of the end of PY22 (data source: RSA dashboard report). RSA has indicated that this is below average compared to other State VR agencies.

- Strategy 1.3a: Provide training to pre-ets providers on the VR referral process and the role they can play in facilitating referrals of students with disabilities. Training will be conducted annually, resulting in a 10% increase in the portion of pre-ets students who apply for VR services each year (PY22 baseline: 9%; data source: RSA dashboard report).
- Strategy 1.3b: Review referral practices with schools and local VR offices and address areas of improvement as needed to support an increase in student applications to VR. The number of students entering VR or pre-ets will represent at least 30% of students aged 14-22 receiving services through an IEP or 504 plan reported by DOE annually (current



performance for PY22: 16,545 or 26% of students reported on RSA PY22 dashboard report, of 15,100 students age 14-22 with 504 plan and 38,169 students 14-24 on IEP as reported by DOE December 2022).

- Strategy 1.3c: Youth VR counselors will support efforts to increase the number of potentially eligible pre-ETS students who apply to VR, through a comprehensive review of pre-ets cases annually. Youth VRCs will identify students who need referral to VR, including those nearing exit from school and will facilitate the referral process as needed. This review will be conducted by December of each academic year.
- Strategy 1.3d: Identify promising practices in the delivery of required Pre-ETS and transition activities, such as Seamless Transition projects in partnership with BDS, the use of peer mentors for students with disabilities, increased student involvement in the development of Pre-ETS curricula at the local level, and coordination with Indiana Career Explorer on transition related initiatives. At least one promising practice will be implemented annually during this State plan period.

Overall measure: VR participant attrition will decrease by at least 10% during the State plan project period (PY22 Q4 RSA Dashboard baseline: Of all exits for that quarter, 60.7% exited VR services after eligibility and prior to signed IPE or after IPE without an employment outcome).

Goal 2: Improve quality and quantity of outcomes

Priority 2.1: Build VR service delivery capacity, including increased capacity of vendors to provide timely and quality services

Basis: Many VR employment service providers have implemented wait lists or waiting periods for new referrals from VR. For example, in the Indianapolis area, the largest metropolitan region in the State, VR field managers have reported that all providers serving the area except for two, have had a wait list over the last year. This accounts for at least 90% of providers serving the Indianapolis and surrounding area. Providers report experiencing significant turnover of staff, and this was validated through a quarterly provider capacity survey VR conducted during 2022. 76.7% of respondents indicated they experienced 1-2 vacancies each quarter during 2022. This is significant when considering that most providers, well over two-thirds, have 7 or less staff with half of those employing 3 or less staff. The survey results indicate that the vacancy rate accounts for 50-100% turnover for teams of 4 or less, and 14-40% turnover for teams of 5-7.

- Strategy 2.1a: Evaluate the impact of Employment Service Provider performance outcome payments implemented in July 2023. Evaluation will be completed before the end of the State plan period, including identification of applicable revisions.
- Strategy 2.1b: Pursue opportunities for enhanced training and technical assistance to VR Employment Service providers with the goal of improving provider performance and outcomes, such as through the Establishment authority, disability innovation funds, or other allowable sources of funds. Training and technical assistance will begin during the State plan period. The most recent CSNA (Section B) has been updated to reflect specific strategies for improvement and expansion of CRPs through Establishment projects, including access to employment specialist training that meets ACRE competencies, targeted technical assistance for the improvement of the CRP, and supports for potential growth or

expansion in order to increase capacity to serve more VR participants and improve the timeliness and quality of services.

Priority 2.2: Increase VR participant access to multiple pathways to employment

Basis: Given the service provider capacity challenges described above, as well as the need to support a more diverse population as BRS prepares to open all service priority categories, additional paths to employment will be necessary to more adequately meet the needs of VR participants.

- Strategy 2.2a: Enhance existing or develop new pathways for service delivery so that VR participants have access to a variety of pathways to pursue employment services. This may include enhancement of VR led virtual job clubs, expansion of the vendor recruiter role, expanding employment services in CMHCs in partnership with DMHA including expansion of Individual Placement and Support, enhancing the role of the WIOA Navigators, and exploring provider requirements to identify opportunities to expand the network of service providers. At least three pathways will be enhanced for greater access, or a new pathway developed, during the State plan period.

Priority 2.3: Increase participation in work-based learning opportunities and attainment of measurable skills gains or credentials

Basis: While BRS exceeded the negotiated measures for measurable skill gains and credential attainment rate for PY22, only 13% of VR participants were enrolled in a training program or activity that leads to a measurable skill gain or credential (data source: RSA dashboard report PY22 Q4). Additionally, individuals who participate in work-based learning are more likely to achieve employment, and therefore increasing these opportunities is an important strategy in improving employment outcomes.

- Strategy 2.3a: Increase work-based learning opportunities for VR participants, which may include opportunities for increasing On-the-job training (OJT) services, increased partnerships with businesses to host participants, creating internship or apprenticeship opportunities with VR partners, or other work-based learning activities such as through pre-employment transition services or the supported employment plus (SE+) project. At least three new work-based learning strategies will be implemented during the State plan project period.
- Strategy 2.3b: Increase enrollment of VR participants in postsecondary training. Identify and implement strategies to increase enrollment such as continued targeted training to VR postsecondary Counselors, revisiting postsecondary education funding determination procedures, increasing outreach to students, and increasing provision of counseling on postsecondary opportunities through pre-ets. The number of VR participants enrolled in postsecondary education will increase by 10% each year during the State plan period (PY22 baseline: 671 participants with a postsecondary education goal; Data source: Aware and Tableau).

Overall measure: Total number of participants exiting with employment will increase by at least 25% by the end of the State plan period (PY22 baseline: 1,454; data source: RSA Dashboard report), with



average hourly wages increasing by at least 15% by end of the State plan period (PY22 baseline: \$15.10; data source: RSA Dashboard report).

Supported Employment Goal

Priority 2.4: Increase the quality of outcomes for individuals receiving supported employment services.

Basis: The average wages for those who received supported employment services and exited VR with an employment outcome are significantly lower than overall average wages for all employment outcomes. (\$11.71 compared to \$15.10; data source: Aware and Tableau dashboard). Additionally, the average weekly work hours for those receiving supported employment services have remained steady at approximately 20 hours per week, (date source: Aware and Tableau dashboard) with limited or no growth from year to year.

- Strategy 2.4a: BRS will identify and implement strategies to improve the quality of employment outcomes for individuals receiving supported employment services, such as identifying opportunities for enhanced counseling on benefits and work incentives, continued collaboration with the Bureau of Disabilities services to promote competitive integrated employment for individuals with developmental and intellectual disabilities, expansion of Individual Placement and Support in collaboration with the Division of Mental Health and Addiction, and evaluating the Supported Employment plus (SE+) Disability Innovation Fund project to identify emerging best practices. At least three strategies will be implemented during the State plan project period.
- Strategy 2.4b. Priorities and strategies 2.1-2.3 under goal 2 outlined above, are applicable to supported employment services. BRS is targeting a 15% increase in average wages for individuals exiting VR after receiving supported employment services by the end of the State plan period. (PY22 baseline average wages for individuals receiving supported employment services: \$11.71; data source: Aware and Tableau dashboard.)

D. Evaluation and Reports of Progress: VR and Supported Employment Goals

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe:

1. Progress in achieving the goals and priorities identified for the VR and Supported Employment Programs. List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies.

Evaluation and Reports of Progress: VR

Goal 1: Improve the quality of services and outcomes

Priority 1.1: Implement new innovative training strategies for VR Counselors and other VR staff, such as increased use of itinerant (working lead) VR Counselors as regional trainers, enhancements to web-based modules including development of content for VR Case Coordinators, or other strategies. Provide training to staff on post-secondary services, transition responsibilities, extended services to youth with a most significant disability, and training on strengths-based service provision to specific populations such as individuals with mental health conditions and individuals



transitioning from subminimum wage employment to competitive, integrated employment. At least two new training focus areas will be identified annually with training provided to applicable staff during PY20-PY21. This goal is extended into PY22-PY23.

Outcome 1.1: Achieved. All training goals outlined above were achieved, along with provision of additional training including inclusive service delivery, cultural competencies, and training on serving individuals with substance use disorder. Significant training priorities during PY20-21 included serving individuals with mental health conditions and diversity, equity, inclusion, and accessibility. An additional focus during PY22-23 was training around career pathways and postsecondary services. VR shifted approximately 20 current VR Counselor positions to focus on postsecondary services, and then subsequently created a postsecondary VR Counselor lead in each of the five VR regions. Intensive training was provided to these staff to improve consistency in the delivery of postsecondary training services and funding determinations. Postsecondary Counselor leads also perform quality assurance review of postsecondary Counselors in their regions and provide technical assistance. During the State plan period, VR also provided additional training to support individuals in the transition from subminimum wage to competitive integrated employment. VR has been in the planning year for the Disability Innovation Fund (DIF), Subminimum Wage to Competitive, Integrated Employment (SWTCIE) grant and has begun to roll out training in preparation for implementation of a model demonstration project in October 2023. New VR Counselors have been hired and have received initial training.

Priority 1.2: Identify and implement at least two new strategies during PY22-PY23 for effective training to VR employment service providers, including opportunities for hands-on training to build skills, training focused on strengths-based service provision to individuals with high support needs, opportunities for joint training with VR staff, and other needed topics. Identify additional strategies to build capacity within providers to serve VR participants, such as facilitating supervisor circles and obtaining recommendations from the Discovery cohort on needed revisions to Discovery service practices.

Outcome 1.2: Achieved. Supervisor circles have been well attended by management staff from providers across the State, to share best practices and learn about effective strategies and helpful resources. As part of the SWTCIE grant, 4 pilot provider organizations have received training to support improvement in the delivery of supported employment services. These pilot organizations also completed a baseline fidelity review to evaluate their level of fidelity and identify specific training needs to support areas of improvement in an effort to work toward high fidelity. The SWTCIE grant will support additional training, along with technical assistance, to help support those areas of improvement. The Discovery cohort presented written recommendations for the improvement of Discovery services, and some recommendations have begun to be implemented including issuing several helpful guidance documents to share best practices and provide helpful tools to VR and provider staff. Joint training was provided to VR and providers to share updates to benefits/work incentives counseling.

Priority 1.3: Continue to engage appropriate stakeholders, including VR, Division of Mental Health and Addiction (DMHA), Community Mental Health Centers, NAMI, Key Consumer Organization, individuals with lived experience, and others through a statewide taskforce during PY22-PY23. The taskforce will continue its efforts to improve services and outcomes for VR participants with mental health conditions as well as serve as the advisory board for the early adopter IPS sites. In

collaboration with DMHA, VR will evaluate outcomes of early adopter IPS sites such as employment rate, average wages and hours worked, length of time to placement, and other relevant data elements. Project evaluation will be conducted during the PY22-23 State plan period.

Outcome 1.3: Achieved. The taskforce has continued to meet quarterly. VR and DMHA meet biweekly to jointly support IPS implementation. A funding guidance document was jointly developed, which outlines approaches for braiding and sequencing VR and Medicaid dollars to support individuals receiving IPS and pursuing employment. The two early adopter IPS sites have been in place for two years. Data from year one was reviewed and compiled as of the submission of this State plan, reflecting a total of 89 participants served in year one. At the end of year one, 22 participants achieved employment, with the remaining either still pursuing employment or having exited the program. Additionally, VR and DMHA entered into an interagency written agreement in PY22 to formalize collaboration and facilitate information sharing.

Priority 1.4: Identify and implement strategies to improve employment outcomes, such as exploration of the need for Establishment projects to further improve service provision by community rehabilitation programs, analysis of the impact of discovery activities on employment outcomes, increased utilization of supported employment services, sharing emerging best practices, or other strategies. The number of VR participants achieving employment will increase by 10% (pre-pandemic baseline 2160) and average hourly wages will increase by at least 5% (PY20 baseline \$12.31).

Outcome 1.4: Partially Achieved. These targets were significantly impacted by the COVID-19 pandemic, however VR has continued to implement strategies to improve outcomes post-pandemic, including increasing the number of individuals released from the order of selection wait list; implementing online job clubs hosted by VR staff to help with participant engagement; implementing provider performance incentive payments to incentivize outcomes achieving living wages, full-time status, and employer offered health benefits; and training staff on strategies to support rapid eligibility determination.

Notable progress has been made in reducing the time between application and eligibility, and between eligibility and development of the Individual Plan for Employment (IPE). Since program year 2020 the average number of days between applicant and eligibility has decreased by seven days. Since program year 2020, the average number of days between eligibility and IPE has decreased by six days.

While average wages have increased by 22% between PY20 and PY22, the total number of participants exiting with employment has decreased. The table below outlines the average weekly work hours, average hourly wage, and total employment exits. Employment exits increased from PY20 to PY21 by 31% but then decreased between PY21 and PY22 by 7%. Weekly work hours remained largely stable, while average wages increased from \$12.31 in PY20 to \$15.10 in PY22.

Program Year	2020	2021	2022
Average Weekly Work Hours	25.2	25.1	24.9
Average Hourly Wage	\$12.31	\$12.85	\$15.10
Total Employment Exits	1,200	1,570	1,454

Goal 2: Improve capacity to serve VR eligible individuals



Priority 2.1: Identify and implement strategies to improve staff capacity to serve eligible individuals, including improved recruitment through use of interns in VR field offices, outreach to colleges and universities, or other strategies; and improved retention through implementation of strategies to improve VR staff job satisfaction such as improved communication and training to staff, and increased opportunities for staff to participate in special projects and workgroups in areas that match their interests. At least one recruitment and retention strategy will be implemented annually during PY20-23.

Outcome 2.1: Achieved. Staff retention has increased substantially over the last few years, with only 4.5% of VR Counselor positions vacant as of July 2023 (2.5% vacant as of November 2023). During the first two years of the State plan period, VR initiated the Discovery Cohort, a project involving numerous VR staff who are evaluating the current discovery services and expectations, identifying best practices as well as areas of improvement, and conducting small pilots in their local areas. Additionally, VR created a new VR Counselor specialty position with a focus on serving VR participants in postsecondary training. Indiana VR was selected to present at a national conference to share staff recruitment/retention and satisfaction strategies due to the significant strides accomplished with Indiana VR staffing. In PY22, VR staff compensation increases were implemented, reflecting approximately a 38% increase in starting salary for a VR Counselor position.

Priority 2.2: Spending patterns have changed during the pandemic due to reduced applicants and vendors pausing services, resulting in increased carryover funding. VR will strategically invest in increased carryover to fill service gaps and expand services to more eligible individuals. VR aims to release at least 1,000 individuals from the order of selection waiting list annually during PY22-23, while sustaining our improved staff capacity, and implement at least two innovative strategies to address service gaps such as enhanced benefits and work incentives counseling.

Outcome 2.2: Achieved. VR has released over 3000 individuals from the order of selection waitlist since January 2021, and opened priority category 2 in July 2023 after reducing the waitlist for that priority category to zero. Enhancements to benefits counseling services were implemented in PY21, which included implementation of supplemental benefits and work incentives counseling services to enhance the current benefits information network. Employment service provide rate increases were also implemented in PY21. Additionally, VR has added 13 new VR Counselor positions to support sustained VR staffing capacity.

Priority 2.3: Continue streamlining efforts such as ongoing system modernization including enhancements to the VR Claims Payment System, exploration of a streamlined referral process with core WIOA programs, and review of VR rules and processes to identify opportunities for reduced administrative burden. At least one streamlining effort will be implemented annually during PY20-PY23.

Outcome 2.3: Achieved. VR implemented additional improvements to both the VR case management system (Aware) and the VR Claims Payment System (CPS), streamlining administrative processes for both VR staff and vendors. One example is the implementation of DocuSign to allow for better ease of capturing signatures from participants. The process for conducting quarterly follow up activities was also significantly streamlined through full implementation of the SWIS agreement with DWD, enabling VR to meet federal requirements with reduced burden on field staff.



Enhancements to the Pre-ETS portal were also implemented to improve program monitoring and internal controls. VR also implemented an online application and is targeting its outreach on this mode of application to transition aged youth and stakeholders. Since the release of the online application VR receives on average 50 applications a month. A new Learning Management System was implemented which improved access to web-based learning modules for staff who use screen readers or other assistive technology. VR modernized the provider directory by using Salesforce. Participants can access the provider directory to assist in informed choice in selecting an employment service provider. Additional BRS programs, including Deaf and Hard of Hearing Services and the Business Enterprise Program, also achieved modernization in information technology, including an online interpreter scheduling platform for DHHS and a new BEP licensed manager portal for the BEP program.

Goal 3: Enhance collaboration with a variety of partners to ensure that jobseekers with disabilities have access to a variety of pathways to employment

Priority 3.1: Continue collaboration with core WIOA partners through strategies such as implementation of a combined State plan, maintaining and enhancing written partnership agreements, implementing Indiana's SWIS agreement, joint participation in special projects such as Department of Labor training and technical assistance projects to promote increase employment for individuals with mental health conditions, and other efforts. At least one new or enhanced collaboration effort will be achieved annually in PY20-PY23.

Outcome 3.1: Achieved. In addition to collaboration on development of the combined State plan, VR partnered at the local level with several workforce regions to implement a shared scheduling software to streamline the referral process across VR and other workforce programs. Annual agreements for infrastructure funding also continued and the JAG agreement was significantly enhanced to target services to a larger population of students with disabilities. The percentage of students served through JAG who have a disability has increased from 5% to 20%. VR has continued to partner with DMHA as mentioned above on an IPS early adopter project and has developed an interagency agreement.

Priority 3.2: Continue to build capacity for business engagement through implementation of new and innovative strategies and partnerships. Strategies may include distribution of a toolkit for businesses with helpful resources for hiring jobseekers with disabilities, ongoing and continued education to workforce development boards on improving opportunities for employment for individuals with disabilities, enhancing resources such as a dedicated VR webpage for businesses, providing training to stakeholders including employment service providers, coordinating with the Governor's Council for Persons with Disabilities to amplify their awareness campaigns and education events during National Disability Awareness Month and National Disability Employment Awareness Month (NDEAM), and increasing partnerships at the local, State, and national level. At least one new or enhanced strategy will be implemented annually PY20-PY23.

Outcome 3.2: Achieved. The Business & Community Engagement team supports employers by providing resources around the employment of persons with disabilities and creating an inclusive workplace. This is accomplished through the provision of resources and information via a dedicated webpage ([FSSA: DDRS: Business and Community Engagement](#)), on social media (Twitter and Facebook), and in person. The team attends networking events and resource fairs around the State;



shares information with internal staff about employer partners and employment/work experience/internship opportunities and provides training as requested. Opportunities to present to large groups of employers via sponsored events by local human resources professional groups like SHRM (Society for Human Resource Management) and local business networking groups like area chambers of commerce have proven to be quality outreach activities that can lead to long-term employer connections. The engagement team also participates in monthly coalition meetings in communities around the State that bring employers and jobseekers together to facilitate connections between those employers and jobseekers. Connecting with and engaging employers who are actively seeking to hire individuals with disabilities is a key priority of these coalitions and it has proven to be successful.

Priority 3.3: Identify best practices in the delivery of required Pre-ETS activities such as incorporation of the LifeCourse Framework and identify areas of growth such as increased focus on career and technical education for students with disabilities and collaboration with Department of Education on a new student portfolio and graduation pathway requirements, and increased access to paid work experiences. Enhance Pre-ETS coordinating activities through increased transition efforts of VR staff including dedicated VR Youth Counselors. Enhance the Memorandum of Understanding with DWD to increase participation of students with disabilities in the Jobs for America's Graduates (JAG) program. Ensure that 15% of VR federal funds are earmarked for Pre-ETS each federal fiscal year and increase the number of students receiving Pre-ETS annually. Increase the number of students receiving Pre-ETS who apply for VR services in PY22-23.

Outcome 3.3: Achieved. VR met the 15% reserve requirement for both FFY 2021 and 2022. This was due to a number of strategies including increased availability of stipends to support paid work experiences for students with disabilities, our continued JAG partnership, increased summer programming for students, and an authorized activity contract that supports FEAT (Family Employment Awareness Training) among other items. JAG continues to successfully serve students with disabilities through pre-ETS funding. Prior to access to Pre-ETS funding, 4% of students participating in JAG had an IEP or 504 plan. As of this writing, 20% of JAG Indiana students have an IEP or 504. Additionally, the overall 2022 graduation rate for students with disabilities was 76.41%, while those students with disabilities enrolled in JAG had a graduation rate of 93%. A series of training modules has been developed and are now available to Pre-ETS career coaches that cover topics such as effective community-based instruction, effective partnerships with schools, improving access to underserved populations and other topics. In addition, VR partnered with Public Consulting Group (PCG), in creating a Pre-ETS toolkit to assist career coaches in accessing resources and developing quality activities including improving collaboration with schools, lesson plans and skill-building exercises and other online resources. The percentage of students receiving Pre-ETS who apply for VR services was 9% as of the end of PY22, compared to 5% at the beginning of PY21, which represents some growth, but continued growth is needed in this area.

Priority 3.4: Continue collaboration with other State agencies, such as participation in key advisory groups for BDS especially as it pertains to competitive integrated employment, co-leading the IPS early adopter project with DMHA, and collaboration with other State agencies in the implementation of Employment First philosophy in Indiana in alignment with the Employment First Act. Increase opportunities for targeted local partnership such as enhanced collaboration with 14c facilities, local workforce programs, community mental health centers, local schools, and others.

Increased collaboration may improve education and awareness across organizations, create opportunities for shared participants or shared service costs, and increase referrals to VR. At least one new collaborative partnership will be achieved annually in PY20-PY23.

Outcome 3.4: Achieved. VR further enhanced collaboration with DMHA throughout the State plan period, culminating in implementation of IPS early adopter sites. This collaboration has been expanded to include representation from the Office of Medicaid Policy and Planning, which has been crucial in developing guidance on braided and sequenced funding to fiscally support IPS services. BRS Leadership participation in a Supported Employment Leadership Network (SELN) assessment with the Division of Disability and Rehabilitation Services and Bureau of Disabilities services, to identify areas of strength and areas of improvement. BRS and BDS are also working on strategies for streamlined application and eligibility processes across both programs to better serve mutual participants. VR and the State's Adult Education program provided cross-training to staff, revealing opportunities to braid services to better support participants across both programs.

Evaluation and Reports of Progress: Supported Employment

Goal 1: VR Supported Employment providers will increase knowledge and skills on the provision of supported employment services, including greater understanding and focus on development of natural supports, job readiness training techniques, customized employment, and strategies for achieving stabilization on the job. BRS will invest in training for supported employment providers including classroom-based, web-based, and hands-on workshops that focus on job coaching and job readiness training techniques. BRS will examine strategies for improvement of community rehabilitation providers to ensure capacity to carry out increased expectations under the new model, such as provision of funding for Establishment projects. At least one new training strategy will be implemented annually, such as micro-training or innovative hands-on training opportunities.

Outcome: Achieved. Provider training was enhanced with the addition of mentoring/coaching to supplement classroom-based training. Additionally, BRS continued to support establishment projects through the end of the 4-year project period. During the final year of the establishment project period, 2398 individuals received supported employment services, compared to a baseline of 774 individuals receiving supported employment prior to project start. Lunch and learns have been provided throughout the last two years to provide short, but impactful training on a variety of topics including serving individuals with multiple disabilities.

Goal 2: BRS will implement strategies to increase the quality of outcomes for individuals receiving supported employment services. There will be a 10% increase in average wages for individuals exiting VR after receiving supported employment services by the end of the State plan period. Baseline PY20 average wages for individuals receiving supported employment services was \$10.10.

Outcome: Achieved. Average wages for individuals receiving supported employment services increased by 16% from PY20 to PY22. The table below outlines average weekly work hours and average wages for VR participants who received supported employment services, as well as total number and percent of employment outcomes that were participants who received supported employment services. Average weekly work hours have remained relatively stable, while average hourly wages have increased each year. The percentage of individuals exiting VR with employment who received employment services was 40% in PY20 and 41% in PY21 and PY22.



Program Year	2020	2021	2022
Average Weekly Work Hours	20.3	21.3	20.4
Average Hourly Wages	\$10.10	\$10.58	\$11.71
Employment Outcomes who received Supported Employment	476 / 40%	644 / 41%	597 / 41%

2. Performance on the performance accountability indicators under section 116 of WIOA for the most recently completed program year, reflecting actual and negotiated levels of performance. Explain any discrepancies in the actual and negotiated levels.

VR made necessary modifications to the data collection system to ensure new required data elements are tracked and collected, including post-exit data, and all data is included in the submission of quarterly RSA-911 reports. The goals outlined above helped to drive performance regarding median wages and employment rates, as well as measurable skill gains and credential attainment. In 2020, VR improved collection of data related to measurable skill gains and postsecondary credential attainment, with technical assistance from WINTAC. A webinar was held with statewide VR management staff to improve training and guidance to field staff on data collection needs related to core performance measures. VR is tracking employer engagement data in DWD's INGage system, a joint effort with DWD. Tracking data for employer engagement in a single system across WIOA core programs allows for efficient and robust reporting of outcomes for this core performance indicator.

Outcome: BRS exceeded negotiated levels of performance for the employment rate second quarter after exit, and employment rate fourth quarter after exit, at 60.4% (negotiated 51.3%) and 57.9% (negotiated 48.3%) respectively. BRS' actual median earnings level exceeded the negotiated rate at \$3,561.54 (negotiated \$3,431). Additionally, BRS exceeded the negotiated performance level for credential rate with an actual performance of 47.7% compared to the negotiated level of 20%. Finally, measurable skill gains exceeded the negotiated level of performance at 65.2% (negotiated 63.8%). In summary, BRS exceeded all performance accountability indicators negotiated levels for PY22.

Program Year 22	Negotiated	Actual	Result
Employment Rate Q2	51.3%	60.4%	exceeded
Employment Rate Q4	48.3%	57.9%	exceeded
Median Earnings	\$3,431	\$3,561.54	exceeded
Credential Rate	20%	47.7%	exceeded
Measurable Skill Gains	63.8%	65.2%	exceeded

BRS has made notable improvement in performance in common performance measures as presented in the table below, which outlines performance from PY20 through PY22:

Program Year	2020	2021	2022
Employment Rate Q2	47.9%	56.0%	60.4%
Employment Rate Q4	45.0%	51.4%	57.9%
Median Earnings	\$3,082	\$3,448	\$3,561.54
Credential Rate	13.5%	34.5%	47.7%
Measurable Skill Gains	63.7%	63.5%	65.2%



3. The use of funds reserved for innovation and expansion activities (sections 101(a)(18) and 101(a)(23) of the Rehabilitation Act) (e.g., SRC, SILC).

VR continued to support the Indiana Statewide Independent Living Council (INSILC) with I&E funds. These funds support the council in carrying out their core functions and meet the goals outlined in the State Plan for Independent Living (SPIL). VR has also maintained a business and community engagement Director who has a presence across Indiana to share resources and educate businesses about opportunities to employ individuals with disabilities. She also provides technical assistance to VR staff to support local business engagement efforts.

E. Supported Employment Services, Distribution of Title VI Funds, and Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

1. Acceptance of title VI funds:

A. VR agency requests to receive title VI funds.

B. VR agency does NOT elect to receive title VI funds and understands that supported employment services must still be provided under title I.

2. If the VR agency has elected to receive title VI funds, Section 606(b)(3) of the Rehabilitation Act requires VR agencies to include specific goals and priorities with respect to the distribution of title VI funds received under section 603 of the Rehabilitation Act for the provision of supported employment services. Describe the use of title VI funds and how they will be used in meeting the goals and priorities of the Supported Employment program.

Please see section C. Goals, Priorities, and Strategies, item 2D for Supported Employment goals.

Indiana receives approximately \$350,000/year of Title VI B funds to provide supported employment (SE) services. VR has made a commitment to serve people with the most significant disabilities and also utilizes Title I dollars to serve this population. VR spent more than \$3M million on hourly SE services and \$4.7M on '4-week support' and 'retention' milestone payments for individuals with a most significant disability in PY22, for a total of \$7.7M on supported employment services in PY22. 2,396 participants received supported employment services in PY22. The table below outlines SE expenditures and participants served for the last three completed performance years. Total SE expenses have increased from just under \$6M in PY20 to \$7.7M in PY22, with total served ranging from 2,168 to 2,508 during the last three performance years. It should be noted that SE spend occurs only after an individual is placed, so all expenditures and participants served represent individuals who were employed

Program year	2020	2021	2022
Supported Employment	\$2,293,358	\$2,586,744	\$3,006,612
4-week support	\$2,710,00	\$3,088,000	\$2,874,000
Retention milestone	\$971,000	\$1,572,500	\$1,825,350
Grand Total	\$5,974,458	\$7,247,244	\$7,705,962
Participant Count	2,168	2,508	2,396

Supported employment services are carried out by accredited employment service providers and follow requirements outlined in the VR employment services manual.



For participants with intellectual/developmental disabilities eligible for services under the Bureau of Disabilities Services (BDS), VR works collaboratively with BDS to provide SE services and seamless transition to extended services. The initial job placement, training and support needed for stabilization are typically provided through VR. Extended Services through BDS, natural supports or Medicaid Rehabilitation Option funding, provide additional work-related supports needed by the individual to continue to be as independent as possible in competitive, integrated employment. For BDS participants, ongoing employment support services are identified in the participants' Individualized Support Plan and must be related to the participants' limitations in functional areas (i.e., self-care, understanding and use of language, learning, mobility, self-direction, capacity for independent living, economic self-sufficiency), as are necessary to maintain employment. As an individual reaches stabilization on the job, VR initiates documentation to BDS to facilitate transfer to extended services, ensuring this documentation is provided at least 60 days prior to expected transition to extended services, helping prevent any gap in receipt of needed supports as an individual transitions to VR exit. Extended Services are provided in competitive, integrated settings where persons without disabilities are also employed. Extended Services do not include sheltered work or other similar types of vocational services furnished in specialized facilities or volunteer endeavors.

BRS also worked in collaboration with the Division of Mental Health and Addiction and Office of Medicaid Policy and Planning to develop written guidance on the utilization of Medicaid Rehabilitation Option (MRO) to support individuals in extended services. The braiding of VR and MRO funding has been critical in the implementation of early adopter Individual Placement and Support (IPS) sites.

VR provides funding for extended services for youth with a most significant disability, for up to 4 years, for individuals who are not BDS eligible or do not have another means of obtaining necessary extended services. Joint training was provided in early 2019 to both VR and employment service provider staff on VR-funded extended services, including the process for requesting services, documentation requirements, and criteria for receipt of services

3. Supported employment services may be provided with title 1 or title VI funds following placement of individuals with the most significant disabilities in employment. In accordance with section 101(a)(22) and section 606(b)(3) of the Rehabilitation Act, describe the quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities; and the timing of transition to extended services.

Indiana's Supported Employment (SE) services are highly individualized and involve ongoing support services and other appropriate services needed to support and maintain an individual with the most significant disability (MSD), including youth with the most significant disabilities, in SE for a period of time that generally does not exceed 24 months. Such services, such as job coaching, are for individuals who have SE and long-term supports identified on the Individualized Plan for Employment (IPE). Often, because of the nature and severity of the individuals' disability, there is a need for extended services that are provided by a State agency, private nonprofit organization, natural supports, or any other appropriate resources that are funded outside of VR. VR funding is available for the provision of extended services to Youth with a MSD, for a period not to exceed four



years once the youth has exhausted 24 months of SE services and is not eligible for extended services through other sources.

Eligible VR participants with an MSD obtain SE services through accredited Community Rehabilitation Programs (CRPs) across the State. SE services are provided from the time of job placement through achievement of stabilization and retention (90 days after stabilization). The expected outcome of SE services is to ensure that stabilization on the job has appropriately occurred after a period of gradually decreasing needed supports and a correlated demonstration of increased independence. The intensive level of support needs should be well-documented by the CRPs in the Employment Support and Retention Plan, and the expectation of fading (i.e., decreasing the amount of support as a consumer becomes more proficient in completing job duties) is important to reach optimal independence. VR acknowledges that fading of supports may not always occur in a completely linear process, and levels of SE support may ebb and flow depending on the needs of the individual. However, a pattern of increased independence and reduced need for support (fading) should be evident prior to the identification that stabilization has occurred for an individual needing SE services. More specifics regarding Supported Employment may be found in the Indiana Vocational Rehabilitation Services – Manual of Employment Services at www.vrs.in.gov.

4. Sections 101(a)(22) and 606(b)(4) of the Rehabilitation Act require the VR agency to describe efforts to identify and arrange, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services. The description must include extended services, as applicable, to individuals with the most significant disabilities, including the provision of extended services to youth with the most significant disabilities in accordance with 34 CFR 363.4(a) and 34 CFR 361.5(c)(19)(v).

It is critical that early conversations take place regarding the anticipated need for extended services between VR, the participant, and the CRP to begin planning for the transition to extended services, including the possibility of VR funding youth extended services if no other (or inadequate) funding sources are available. It is important to recognize the impact that a good job matching appropriate and intensive ongoing supports may have on the amount and type of extended services an individual may need long term in order to maintain his/her job. It is also valuable to begin identifying and exploring natural supports an individual may have available to him/her early in the process. When it has been determined that a participant is approaching stabilization on the job, the process to transition to extended services begins, and this process must identify the participant's ongoing specific need(s), types of supports and services, the sources of extended services, and the projected number of hours of support needed. VR Counselors are required to assist in facilitating the seamless transition to extended services funded by other entities, prior to VR case closure. The Stabilization Notification form is completed for VR participants who require extended services. VR and CRP personnel work jointly to complete this document, which is subsequently provided to entities providing extended services, e.g., Bureau of Development Disability Services, at least 60 days prior to the anticipated transition date to extended services.

VR administration continues to focus on the need to ensure quality SE service as such services are essential in securing quality employment outcomes for those participants with MSD. VR will continue to work closely with the Bureau of Disabilities Services, the Division of Mental Health and Addiction, and CRPs to identify areas of concern, implement needed changes in practices, and provide training and/or technical assistance



F. Annual Estimates

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 CFR § 361.29(b), annual estimates must include the following projections:

**1. Estimates for next Federal fiscal year:
A. VR Program**

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services Under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
Category 1 MSD	10,139	10,139	\$27,466,355	0
Category 2 SD	1,599	1,599	\$4,331,598	0
Category 3 all other eligible	1,582	1,282	\$3,472,703	300
Total	13,320	13,020	\$35,270,656	300

B. Supported Employment Program

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services Under Supported Employment Program	Costs of Services using Title I & Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
Category 1 MSD	2,396	2,396	\$7,705,962	0

G. Order of Selection

- The VR agency is not implementing an order of selection and all eligible individuals will be served.
- The VR agency is implementing an order of selection with one or more categories closed.

VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection. Pursuant to section 101(a)(5) of the Rehabilitation Act, this description must be amended when the VR agency determines, based on the annual estimates described in description (f), that VR services cannot be provided to all eligible individuals with disabilities in the State who apply for and are determined eligible for services.

**1. For VR agencies that have defined priority categories describe:
A. The justification for the order**



Please note that at the time of this State plan submission, Indiana BRS continues to implement an order of selection, however, anticipates ending the order of selection shortly after the PY24-25 State plan takes effect (by the end of calendar year 2024).

Indiana began operating under an order of selection on August 1, 2017, due to a deficit of staffing and fiscal resources, as approved by RSA through a State Plan amendment. Priority category 1 has remained open, while priority categories 2 and 3 were closed from August 2017 through early July 2023. Priority category 2 opened July 5, 2023. Numerous initiatives have been implemented to improve capacity to enable VR to offer services to approximately 300 individuals on the wait list each quarter.

As of this writing, one priority category (priority category 3) is closed, and VR has begun to serve individuals on the priority category 3 waitlist. As of August 30, 2023, there are 1,095 individuals on the wait list, all in priority category 3.

VR will continue to release individuals from the waitlist each quarter to support forward progress toward ending the order of selection. The order of selection will end once the waitlist is reduced to zero and priority category 3 is open. VR anticipates an end to the order of selection by the end of calendar year 2024

B. The order (priority categories) to be followed in selecting eligible individuals to be provided VR services ensuring that individuals with the most significant disabilities are selected for services before all other individuals with disabilities

Priority Categories:

Effective August 1, 2017, individuals are served in the following order of priority under the Order of Selection:

- Priority Category 1: Individuals determined to have a most significant disability (MSD);
- Priority Category 2: Individuals determined to have a significant disability (SD); and,
- Priority Category 3: All other eligible individuals (Individuals determined to have a non-significant disability (NSD)).

MSD: An individual who has a severe physical or mental impairment that seriously limits three or more functional capacities (communication, interpersonal skills, mobility, self-care, self-direction, work skills, or work tolerance) in terms of an employment outcome, requires multiple vocational rehabilitation services over an extended period of time, and has one or more physical or mental disabilities determined to cause comparable substantial functional limitation.

SD: An individual who has a severe physical or mental impairment that seriously limits one or more functional capacities (communication, interpersonal skills, mobility, self-care, self-direction, work skills, or work tolerance) in terms of an employment outcome and whose vocational rehabilitation can be expected to require multiple vocational rehabilitation services over an extended period of time.

NSD: All other VR eligible individuals.

Basis for Order of Selection – Prohibited Factors:

The Order of Selection shall not be based on any other factors, including:



- Any duration of residency requirement, provided the individual is present in the State;
- Type of disability;
- Age, gender, race, color, or national origin;
- Source of referral;
- Type of expected employment outcome;
- The need for specific services or anticipated cost of services required by an individual; or
- The income level of an individual or an individual's family

VR will continue to process referrals, complete application/intake, and determine eligibility and severity determination for all new referrals. Individuals who are determined to be an individual with an MSD (Priority category 1) will be prioritized for services. Individuals in the other disability priority categories will be deferred for services and will be served according to application date and in order of priority, as sufficient resources become available. The process is further outlined below:

1. VR will continue to take all referrals and schedule individuals for intake appointments, per federal requirements.
2. VR Counselors will meet with each applicant for their intake appointment and will determine eligibility and disability priority category assignment for all VR eligible individuals, per federal requirements.
3. Eligible individuals who are MSD will jointly develop the IPE with their VR Counselor, and necessary services will be implemented. Individuals who are SD and NSD will be deferred for services. Information and referral will be provided as appropriate for these individuals, including sharing local area office resource guides.
4. As sufficient resources become available to serve individuals who were deferred for services, BRS will assign individuals released from deferred services status to the appropriate VR Office and VR Counselor. Individuals in priority category 2, SD, would be the next priority for release from deferred services status, based on earliest application date, and in accordance with federal requirements.
5. Once the individual is released from deferred services status, the case will be distributed to the appropriate office/VR Counselor, and IPE will be developed, and necessary services will be implemented as appropriate

C. The VR agency's goals for serving individuals in each priority category, including how the agency will assist eligible individuals assigned to closed priority categories with information and referral, the method in which the VR agency will manage waiting lists, and the projected timelines for opening priority categories. NOTE: Priority categories are considered open when all individuals in the priority category may be served.

An important goal for Indiana BRS is to continue with forward progress toward opening all priority categories and ending the order of selection by the end of calendar year 2024. Priority category 1 has remained open throughout the order of selection, and priority category 2 was opened July 5, 2023. Only priority category 3 remains closed as of this State plan submission. VR is targeting a release of approximately 300 individuals each quarter from the priority category 3 waitlist, based on application date. Releases are made during the first week of each quarter (July, October, January, April) and VR staff are required to make at least 5 different outreach attempts to individuals in each release. Individuals who elect to receive services will work with their assigned VR Counselor to



develop and IPE after coming off of the waitlist. Individuals who no longer desire services or cannot be contacted after multiple attempts, will exit the VR program.

BRS anticipates an end to the order of selection on, or before, December 2024.

BRS shares relevant information about other organizations with individuals unable to be served by VR who need assistance to obtain or maintain employment, such as facilitating a referral to the local Work One. Other resources may include Ticket to Work Employment Networks, Centers for Independent Living, College, and Universities, the IN Data Assistive Technology program, and other State and local resources. A resource guide for each VR area office is maintained on the VR website, on an order of selection resource page. Resource guides are also shared during application intake appointments, and a link is provided in a semi-annual letter sent to all individuals on the wait list. A letter is sent every six months to all individuals on the wait list, advising them to contact their local VR office to keep their contact information up to date

2. Has the VR agency elected to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment?

Yes

No

VR is in the process of promulgating new rules which will provide authority for BRS to serve eligible individuals outside of the order of selection who require specific services or equipment to maintain employment. It is also likely the order of selection will end prior to, or around the same time as the rules are promulgated.

H. Waiver of Statewidness

The State plan shall be in effect in all political subdivisions of the State; however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 CFR 361.26.

If the VR agency is requesting a waiver of statewidness or has a previously approved waiver of statewidness, describe the types of services and the local entities providing such services under the waiver of statewidness and how the agency has complied with the requirements in 34 CFR 361.26. If the VR agency is not requesting or does not have an approved waiver of statewidness, please indicate "not applicable."

Not Applicable

I. Comprehensive System of Personnel Development

In accordance with the requirements in section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. Analysis of current personnel and projected personnel needs including:



A. The number and type of personnel that are employed by the VR agency in the provision of vocational rehabilitation services, including ratios of qualified vocational rehabilitation counselors to clients

There are currently 346 positions in BRS, further detailed in the table under 1C below. As of July 2023, the average Caseload Counselor to participant ratio is approximately 1:75, however in some areas of the State, caseloads are as high as 100 or more, and most office Supervisors are also carrying caseloads at this time. Additionally, the large majority of these cases are individuals with most significant disabilities given that two of three priority categories were closed between August 1, 2017, and July 5, 2023. Average caseload sizes are anticipated to increase over the next one to two years due to opening a second priority category in July 2023 and targeting the opening of the third priority category by end of calendar year 2024, as well as an increasing trend in applications.

Over the last four years, VR Counselor retention has improved substantially and as of July 2023, only 4.5% of VR Counselor positions were vacant with another 11% new VR Counselor Trainees. The vacancy rate further decreased by November 2023 at 2.5%. VR was able to add 13 new VR Counselor positions over the last year.

BRS employs VR Counselors, Working Lead VR Counselors, VR Counselor Trainees (new VR Counselors in trainee status), VR Case Coordinators, a VR Supervisor in each area, a Secretary in each office location, a Region Manager for each region, a Field Services Director, VR Staff Trainers, and a leadership team including subject matter experts who provide technical assistance to staff on specific populations or services categories (e.g., home modifications, postsecondary services, small business services). See table below for number of personnel.

B. The number of personnel currently needed by the VR agency to provide VR services, broken down by personnel category

See table under item C below.

C. Projections of the number of personnel, broken down by personnel category, who will be needed by the VR agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Vocational Rehabilitation Counselors	179	4	200
Itinerant/Working Lead VR Counselors	8	0	9
VR Youth Counselors	10	0	10
VR Area Supervisors	25	0	26
VR Region Managers	5	0	5
BRS Management/Leadership	8	0	9
VR Case Coordinators	64	2	70
VR Area Secretaries	17	2	19
Blind/VI/Deaf Programs	4	1	5



BRS Central Office	14	2	17
Business Engagement staff	1	0	6
Total	335	11	376

D. Ratio of qualified VR counselors to clients

As of July 2023, the Caseload Counselor to participant ratio is approximately 1:75. Caseloads have increased over the past year, likely due to progress toward ending the order of selection. Caseload sizes are currently at a level that leaves minimal room for growth in new applicants. It should also be noted that caseload sizes are as high as 100 or more in some parts of the State that are experiencing a higher rate of new applicants. Additionally, the large majority of VR participants are individuals with most significant disabilities given that two or three priority categories were closed between August 1, 2017, and July 5, 2023. Additionally, provider capacity challenges have resulted in lengthier wait times for individuals to obtain those services. Both of these factors contribute to participants remaining on caseloads for a longer period of time. Average caseload sizes are anticipated to increase within the next one to two years due to opening a second priority category in July 2023 and targeting the opening of the third priority category by end of calendar year 2024. BRS also experienced a 10% increase in applicants between PY21 and PY22 and anticipates this trend continuing. Within the next one to two years, BRS anticipates average caseload sizes to grow by at least 15% for an average of 86 cases per VR Counselor, which is the maximum caseload size that BRS would consider a VR Counselor to effectively manage. That caseload ratio does not support sustained growth in the number of VR participants. Therefore, a need for increased staffing is anticipated to be necessary. BRS is projecting a need for an increase of 30 staff over the next two years, including 17 VR Counselors, 1 Itinerant/working lead Counselor, 1 Supervisor and 4 VR Case Coordinators, along with additional staff to support business engagement and other administrative activities. Some of those positions are needed more quickly to address current areas of high volume

E. Projected number of individuals to be served in 5 years

During PY22, VR served 12,660 individuals (individuals receiving services under IPE – this number does not include individuals in application or eligibility status, or individuals on the order of selection wait list). VR projects an increase in the number of individuals served over the next five years due to several factors, including a planned end to the order of selection, an increasing trend in the number of VR applicants (10% increase from PY21 to PY22), targeted outreach efforts to transition aged youth, and special projects such as BRS' Disability Innovation Fund SE+ grant. BRS has projected a 7.5% increase in participants served for PY23, an additional 7.5% of participants in PY24, and then a 5% annual increase during PY25-27.

Projected number of individuals to be served over the next five years:

- PY23 13,610
- PY24 14,631
- PY25 15,362
- PY26 16,130
- PY27 16,937



2. Data and information on personnel preparation and development, recruitment and retention, and staff development, including the following:

A. A list of the institutions of higher education in the State that are preparing VR professionals, by type of program; the number of students enrolled at each of those institutions, broken down by type of program; and the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

Indiana does not have any CACREP Accredited Rehabilitation master’s programs in the State, and therefore there are 0 graduates to report. VR staff are encouraged to pursue online rehabilitation counselor preparation programs through out-of-state institutions which are CACREP-approved.

VR encourages students studying in related fields to participate in internships with the VR agency and believes this to be a valuable recruiting practice. VR will continue to work with local universities to increase the number of interns with hopes of increasing the recruitment pool for vacant VR Counselor positions.

Due to the lack of accredited rehabilitation graduate programs in Indiana and historic challenges in recruiting qualified candidates for VR Counselor positions, BRS modified its minimum educational requirements for VR Counselor positions after WIOA was passed. Current minimum qualifications include a bachelor’s degree in rehabilitation or a related area along with at least one year of related experience. Prior to this significant change, the minimum requirement was a master’s degree in Rehabilitation or related area.

Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
N/A	N/A	0	0

B. The VR agency’s plan for recruitment, preparation and retention of qualified personnel, which addresses the current and projected needs for qualified personnel; and the coordination and facilitation of efforts between the VR agency and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

Over the last 10 years, BRS has implemented several recruitment, training and retention strategies, with great success as staffing retention has been reduced significantly. Only 2.5% of VR Counselors positions are vacant as of November 2023 (4 positions). These strategies included a comprehensive restructuring of the field services staffing model, including the addition of the VR Case Coordinator role to ensure that the VR Counselor role is focused primarily on rehabilitation counseling and guidance. Further restructuring included the addition of 7 working lead VR Counselors to help cover caseloads tied to vacant positions and mentor newly hired VR Counselors, which has recently been increased to 8 working leads. VR further adjusted its staffing model by shifting VR Counselors to either a designated role of performing intakes/application and eligibility/disability priority determination, or a designated role of IPE development and service planning/implementation and placement. All new VR staff complete training to understand the full spectrum of VR services, from referral to closure, however Intake and Eligibility VR Counselors receive additional training around eligibility determination and disability priority category assignments. Likewise, Caseload Counselors receive additional training on development of quality IPEs, as well as more in-depth



training on VR services, such as postsecondary service provision. This ensures that all VR Counselors have a core set of knowledge and skills to perform their role as a qualified VR Counselor, with further depth of knowledge in their area of specialization, e.g., eligibility.

All of these changes increased job satisfaction and created advancement opportunities, and the designation of Intake/Eligibility v. Caseload VR Counselor role also improved efficiency and timeliness of eligibility determination and IPE development and created a higher level of specialization of Counselors within each role. An initial wage increase was implemented in 2019 for VR staff, with a second compensation adjustment in 2022. With these changes, staff retention improved substantially, from over 50% turnover of VR Counselors in 2016 down to about 13.5% at the end of 2023.

VR also expanded training and professional development for VR staff, expanding from 1 training position to a 3-member training team. The team has improved and restructured training for new and seasoned VR staff, incorporating more engaging training strategies such as the use of short videos and interactive activities. VR Counselor working leads and VR Area Supervisors are also important players in the training of new staff from a 'boots on the ground' level. Seasoned Counselors also provide training as a peer, such as providing opportunities for job shadowing.

VR has a long-standing history of hiring qualified candidates from minority backgrounds as well as individuals with disabilities for all BRS positions, including VR Counselors, support staff, and management roles. The Family and Social Services Administration (FSSA), the DDRS/BRS umbrella agency, has updated the agency Affirmative Action plan. Additionally, VR is participating in FSSA Equity initiatives which are designed to promote diversity, equity, inclusion, and accessibility efforts, including hiring a more diverse workforce. VR Counselors also share openings as appropriate with VR participants and VR has hired several former participants into VR positions, including VR Counselor positions.

BRS has a long history of hiring VR staff with disabilities. A survey conducted by State Personnel in 2022 reflected that approximately 40% of BRS staff consider themselves to be an individual with a disability.

C. Description of staff development policies, procedures, and activities that ensure all personnel employed by the VR agency receive appropriate and adequate training and continuing education for professionals and paraprofessionals:

i. Particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998

VR continues to assess training methods and curriculum in order to make necessary improvements to the development and delivery of training for staff, specifically new VR Counselors. Counselor training needs are assessed through survey, dialogue, supervisor recommendations, staff feedback, and agency directives. VR has a dedicated statewide training director to oversee all training initiatives, obtaining ongoing feedback from a variety of staff to work toward continuous improvement in the development and delivery of training. In early 2022, the VR training team was expanded to also include a VR Training Assistant Director as well as a Training Coordinator, taking the team from 1 to 3 staff.



Training is provided through a variety of modalities, including regional trainings, webinars, and in-person workshops. VR is utilizing the YesLMS learning management system for web-based modules for new and seasoned VR staff. The training team has developed a series of new customized training courses for new and more seasoned Counselors and has utilized existing courses in the YesLMS training library to augment the customized training developed. For new Counselors, a training plan has been developed to include 8 weeks of training activities in addition to the YesLMS courses, including video tutorials on the case management system and other relevant topics.

In addition to formal classroom style or web-based training, a great deal of mentoring and coaching occurs at the local level, especially for new staff. Supervisors and Itinerant (working lead) VR Counselors play a large role in coaching new staff and will continue to be a key part of new staff training. BRS established VR Counseling and Guidance Cohorts to focus on the essentials of counseling and guidance throughout the VR process. These are small groups of 5-10 newer VR staff who work with a skilled facilitator and other trainees through a series of sessions, under the supervision of a senior or management-level staff member who has a graduate degree in Rehabilitation or other counseling area or is certified or licensed as a counselor.

ii. Procedures for the acquisition and dissemination of significant knowledge from research and other sources to VR agency professionals and paraprofessionals and for providing training regarding the amendments to the Rehabilitation Act made by the Workforce Innovation and Opportunity Act.

VR also accesses training and resources offered by partners, including the statewide Assistive Technology IN-DATA program which offers 'first Friday' AT webinars specifically for VR staff as well as trainings from the VRTAC-QE, VRTAC-QM, and the Center for Innovative Training in VR (CIT-VR). State and national subject matter experts are frequently invited to present to VR staff through Friday field chats, webinars, and other training modes. Example topic areas have included Adult Education, labor market information, postsecondary services, disability specific content, cultural diversity, and more. Many VR staff are also supported in attending State and national conferences and trainings to obtain relevant content, such as vehicle modifications, traumatic brain injury, program evaluation, transition services, and related. A weekly communications 'Blast' is also distributed to all staff to provide timely information and helpful resources. Furthermore, VR meets regularly with staff through weekly leadership team meetings which include VR region managers and the training team, quarterly supervisor meetings, and quarterly regional meetings with all VR field staff. These meetings have proven to be a great method of information sharing, opportunities to solicit feedback, clarification of procedures and practices, and insight into areas of concern.

The VR training team worked directly with the Indiana Department of Workforce Development (DWD) in developing training material using the YesLMS platform to educate VR and DWD field on WIOA program involvement. This included development of three courses to be completed by both VR and DWD staff on collaboration and coordination between workforce programs, VR, and Adult Education. Additionally, VR is contracting with ten WIOA Partner Navigators to help VR participants navigate programs available through regional Work One (Indiana's term for American Job Centers), while also assisting Work One participants in accessing the VR program.

3. Description of VR agency policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) to ensure that VR agency professional and paraprofessional personnel are adequately trained and prepared, including:



A. Standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services

While Indiana BRS does not require any specific certification, licensing, or registration, BRS has several staff who are Certified Rehabilitation Counselors (CRC). There are currently 17 VR staff who hold a CRC, with 4 additional staff enrolled in master's in rehabilitation counseling programs who plan pursue the CRC credential. Of the 200 current VR counselor positions, 5 have their CRC. VR also has 2 certified region managers, 5 certified area supervisors, and 5 individuals on the Central Office team who are CRC's. As there are no CACREP accredited rehabilitation programs in Indiana, BRS modified the minimum VR Counselor qualifications to ensure a sufficient talent pipeline to fill VR Counselor positions. Those minimum qualifications are detailed below under item B of this section of the State plan. As many VR Counselors do not come to BRS with a Rehabilitation degree, BRS has built a robust training process to ensure that new VR Counselor training fills any education gaps. Those training requirements are outlined throughout this section of the State plan.

B. The establishment and maintenance of education and experience requirements, in accordance with section 101(a)(7)(B)(ii) of the Rehabilitation Act, to ensure that the personnel have a 21st century understanding of the evolving labor force and the needs of individuals with disabilities.

Current VR Counselor qualifications are as follows:

Master's degree from an accredited university in rehabilitation counseling, rehabilitation administration, counseling and guidance, social work, special education, sociology, audiology, education, speech pathology, or a closely related human service area or certification as a Certified Rehabilitation Counselor (CRC) is preferred;

OR

In lieu of a master's degree, a bachelor's degree from an accredited university in rehabilitation counseling, rehabilitation administration, counseling and guidance, social work, special education, sociology, psychology, audiology, education, speech pathology, or a closely related human service area or certification as a Certified Rehabilitation Counselor (CRC); AND

Demonstrated paid or unpaid experience, for not less than (1) one year, consisting of:

- Direct work with individuals with disabilities in a setting such as an independent living center;
- Direct service or advocacy activities that provide such individual with experience and skills in working with individuals with disabilities; or
- Direct experience as an employer, as a small business owner or operator, or in self-employment, or other experience in human resources, recruitment, or experience in supervising employees, training, or other activities that provide experience in competitive integrated employment environments.

Other preferred experience includes:

- Vocational counseling skills, motivational interviewing skills, or related counseling skills
- Awareness of cultural diversity, medical and psychological aspects of disability, counseling theories, assessment tools, job development and placement, Rehabilitation Act, ADA, IDEA, Social Security, Medicaid, Medicare, other State/federal programs, DWD programs,



rehabilitation technology, economic and labor market trends, community organizations, and financial aid.

- Excellent oral and written communication skills, creativity, problem-solving, evaluation of services, and time management skills.
- Ability to communicate with diverse populations, flexibility, handling multiple tasks, maintaining professional demeanor, and ability to empathize.
- Ability to interpret psychological/medical evaluation reports and medical terminology.
- Familiarity with Assistive Technology and how to access AT services.
- Knowledge of local community and statewide resources preferred.
- Knowledge of local and statewide job market preferred.
- Willingness to obtain necessary continuing training/education for CRC maintenance, or if not a CRC willingness to work toward becoming eligible to sit for CRC examination.

Since there are no accredited rehabilitation education programs in the State, BRS identified a need to modify VR Counselor minimum qualifications as outlined above to ensure a sufficient pipeline of qualified applicants. To sustain a high-quality VR Counselor workforce, the training process for new Counselors has also been enhanced, along with continuing education requirements for all VR Counselors, to ensure staff stay up to date on the evolving needs of individuals with disabilities. Individuals hired as VR Counselors that do not have a master's degree in Rehabilitation Counseling or CRC must complete a robust training process, with oversight by the VR Training Team and the local Supervisor. These staff enter as VR Counselor Trainees and perform their work under the supervision of the VR area supervisor or VR working lead Counselor until they have completed initial training and demonstrated the necessary progression in performance of VR Counselor responsibilities to promote to a VR Counselor. They are required to complete 70 clock hours of asynchronous online courses to include, but not limited to, medical and psychological aspects of disability; rehabilitation counseling theory, strategies, and techniques; benefits counseling; and assistive technology. Trainees must demonstrate satisfactory completion of these training requirements and satisfactory performance prior to transitioning out of the VRC Trainee role and into the VR Counselor role. This is assessed by the Supervisor and reviewed with the Region Manager at around 8 months from the VR Counselor Trainees start date. The review can be extended for another 3-6 months if training requirements have not been met or satisfactory competency in performing their responsibilities has not been demonstrated.

In addition, VR Counselor Trainees must demonstrate satisfactory counseling and guidance skills through participation in a Counseling and Guidance Cohort, a small group in which Trainees put their newly acquired skills into practice using scenarios and role play exercises, during their first year of employment. The Counseling and Guidance Cohorts are conducted under the supervision of individuals who hold a graduate degree in Rehabilitation or other counseling area or are certified or licensed as a counselor.

Additionally, all VR Counselors including seasoned staff, are required to complete a minimum of 12 clock hours annually for professional development activities as appropriate and approved by their supervisor.



Through the VR staffing structure outlined in this section including the designation of VR Counselor Trainee from VR Counselor and the designated VR Counselor Specialty roles, e.g., Intake/Eligibility Counselor v. Caseload Counselor; the robust initial training for Trainees; Counseling and Guidance Cohorts; and ongoing professional development for all VR Counselors and Supervisors, VR Counselors are qualified to perform their responsibilities, including non-delegable functions and the authorization and delivery of high quality vocational rehabilitation services. BRS VR Counselors are qualified personnel for purposes of the determinations that must be made in accordance with 34 CFR 361.42(a)(1)(i) and (ii), i.e., that the applicant has a physical or mental impairment, and that the physical or mental impairment constitutes or results in a substantial impediment to employment. VR Counselor Trainees, who are not yet considered to meet the standards as qualified personnel, work under the direct supervision of qualified personnel who will review and approve all of their eligibility determinations.

The current hiring qualifications were put into place shortly following the passing of WIOA legislation. VR initially experienced an increased number of qualified applicants for VR Counselor vacancies as well as improved retention. However, with the continuous drop in the unemployment rate and increasingly competitive job market, recruitment challenges continued for several years following WIOA implementation. Over the last year, BRS has experienced much greater success in recruiting qualified applicants, likely attributed to salary increases and other initiatives as described above.

4. Method(s) the VR agency uses to ensure that personnel are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

VR maintains the ability to communicate with VR participants in their preferred mode of communication in a variety of ways. VR staff access and coordinate foreign language translation, ASL communication, Communication Access Real Time (CART), etc. whenever needed. To ensure communication services are available despite a shortage of some providers (i.e., ASL interpreters, CART providers), VR has increased utilization of remote interpreting services.

VR has VR Counselor Specialists to provide expertise and support for specific populations, including individuals who are deaf or hard of hearing, individuals with low vision, and individuals with a traumatic brain injury. VR seeks candidates with some fluency in ASL for Counselor positions supporting participants with hearing loss. The BRS Aware (VR case management system) team has also expanded their understanding of the use of screen readers with JAWS and has provided additional training to VR staff who use screen readers. Accessibility was also a key consideration in identifying a learning management system to improve delivery of web-based training, and as mentioned, BRS began using YESLMS to allow us to further improve accessibility for staff.

VR also accesses language translation services whenever needed for communication with participants who are non-English speaking. Publications and brochures are available in large print and Spanish versions.

5. As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

VR has a Director of Youth Services on staff to train and notify VR field staff of best practices, changes and initiatives related to working with transition-aged youth. The Director of Youth



Services also collaborates with other agencies, such as Department of Education (DOE) and DWD, to conduct joint training and develop/distribute training materials and other resources. Partners such as the Indiana University Institute on Disability and Community, and Public Consulting Group (PCG) serve as a transition resource to VR and/or DOE and develop and maintain a variety of resources in this area. The Transition Advisory Council serves as an advisory group pertaining to statewide VR transition initiatives, including Pre-ETS and is expanding its scope to serve as the Employment for Youth Advisory Committee to facilitate education and resource sharing based on a needs assessment conducted by BRS and a pre-ets authorized activities contractor. In addition to VR, partners who sit on this group include parent advocates, youth with disabilities, DOE, DWD, local schools, IIDC, VR providers including Pre-ETS providers, Department of Corrections, the Division of Mental Health and Addiction (DMHA), and others.

VR Youth Counselors continue to update their maintenance and expansion plans to identify service and training needs for area VR offices, school staff and providers. In 2023, training was provided to VR staff on improving collaboration with partners around transition, including expectations around the referral process and VR presence in schools through annual meetings, case conferences and transition fairs. This training was designed to increase the number of students applying for VR services, including students receiving Pre-ETS. Material was developed and distributed to all Indiana high schools that describes Pre-ETS activities, how to refer a student to VR and how to reach VR to request attendance by VR at a case conference, transition fair or other meetings or events. This is an area of growth for BRS and data trends on student applications to VR will be monitored throughout this new State plan period to evaluate the success of the updated referral process and expectations.

J. Coordination with Education Officials

In accordance with the requirements in section 101(a)(11)(D) of the Rehabilitation Act:

1. Describe plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities, that are designed to facilitate the transition of the students with disabilities from the receipt of educational services in school to the receipt of vocational rehabilitation services, including pre-employment transition services.

Indiana VR and key partners continue to collaborate for the purpose of streamlined transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services (Pre-ETS). Ongoing Indiana initiatives and WIOA requirements are aligned for VR to coordinate with Education officials and other key partners (e.g., Indiana Department of Workforce Development) to identify the best methods for providing successful transition services to students.

Serving transition-aged students continues to be a priority for VR, even more so with the advent of WIOA and Pre-ETS. Through the efforts of VR's dedicated transition staff, the Director of Youth Services, the Associate Director of Youth Services, and 10 youth counselors located throughout the State, VR has maintained Pre-ETS in all 92 Indiana counties and is active in approximately 400 schools statewide, serving approximately 8,000 students annually. Education to key stakeholders is a major part of maintaining these Pre-ETS programs. This includes VR staff and contractors providing Pre-ETS across the State, as well as outreach and education to students, parents, educators, and others. This training has included face-to-face meetings with Pre-ETS contractors for



the purpose of sharing resources, expectations, and accomplishments, including updated referral information which youth counselors trained career coaches on and shared with school staff. Training with Pre-ETS contractors has also included webinars for VR staff, parents, and educators, presentations to local school systems, and providing ongoing updates to the statewide VR Transition Advisory Council. The focus of much of this outreach has been to aid in understanding the importance of and how to access Pre-ETS for students with disabilities across the State. Outreach has also included training to the Department of Child Services on Pre-ETS, traditional VR services and the process for referrals to both. Updated training on Pre-ETS was conducted for JAG instructors throughout the State at their annual JAG training conference. VR continues to work with DOE on improvements to the updated Indiana Career Explorer (INCE) site which will allow Pre-ETS career coaches and VR Counselors to assist students and VR participants in working on job exploration and goal setting.

VR'S 10 youth counselors work in their respective regions throughout the State assisting with transition and Pre-ETS activities. They update maintenance and expansion plans on a quarterly basis focusing on VR area offices, school systems and Pre-ETS contractors and have introduced many positive changes. They have helped to strengthen the referral process and communication in general with VR and many school systems, assisted providers in accessing schools where Pre-ETS was not widely available, and provided numerous trainings and technical assistance to Pre-ETS and transition stakeholders. Updating the maintenance and expansion plan allows the youth counselors to keep current on student enrollment, referrals to VR, and strengths and concerns with transition and Pre-ETS processes. They work closely with all stakeholders to address concerns, highlight strengths, and continually improve processes, procedures and outreach to students and youth with disabilities.

VR, in collaboration with DOE, established a Statewide Transition Advisory Council to identify and address the barriers that continue to impact students with disabilities, and develop and implement strategies and services to make the transition successful for students and youth with disabilities. The VR/DOE MOU was revised in March 2022 and the Transition Advisory Council continues to serve as the VR/DOE MOU Oversight group and provide input and recommendations into the 5 key oversight areas. These 5 areas are:

1. Reviewing, addressing, and facilitating resolution of concerns relating to transition and Pre-ETS for students with disabilities.
2. Supporting joint training for Partner Agency staff to promote mutual understanding of each Partner Agency's systems.
3. Providing professional development and technical assistance to LEAs and VR Area Offices that enhance collaboration and involvement with community-based organizations, employers, employer groups, and other agencies.
4. Developing and implementing processes for sharing appropriate individual or aggregate data and information regarding students with disabilities, who are being served or may potentially be served by a Partner Agency.
5. Identifying ways to provide timely information to students with disabilities and their families regarding specific work incentives and the positive impact of work on government benefits.



The Statewide Transition Advisory Council includes representation from a wide range of key partners and stakeholders, including the following: VR, DOE, local educational agencies' school personnel and administrators, the Bureau of Disabilities Services (BDS), the Indiana Department of Workforce Development (DWD), Department of Corrections, Center for Deaf & Hard of Hearing Education (CDHHE), Community Mental Health Centers, Indiana Association of People Supporting Employment First (INAPSE), Indiana Association of Rehabilitation Facilities (INARF), Indiana Institute of Disability and Community – Center on Community Living and Careers (IIDC - CCLC), parent representation, the Arc of Indiana, INSOURCE, and other family advocacy groups. BRS has requested appointments from the Governor's office for 2 student representatives on the VR Council.

IIDC-CCLC, along with partners from the Governor's Workforce Cabinet and Office of Career and Technical Education, DOE, and IN*Source created the Career and Technical Education (CTE) workgroup with the goal of increasing enrollment of and positive outcomes for students with disabilities in CTE. The workgroup completed interviews with school counselors at select CTE sites to determine their protocol for student selection, resources for assisting students with disabilities, and overall success rate. This information has been used to identify pilot sites throughout the State with the goal of providing training, technical assistance and other support to increase the number of students with disabilities enrolled and successfully completing CTE courses. The CTE workgroup has updated their plan and is working on developing modified pathways that students can pursue that will allow them to attain micro-credentials in areas of employer demand.

VR has counselors assigned to each school for outreach and education to teachers, students, and parents. These VR counselors collaborate with school staff to enable a seamless transition to life after high school. The goal for each student is for a VR application to be completed, and, for eligible participants who are being served, to have an Individualized Plan for Employment (IPE) in place, before exiting high school. While this process works well in many cases, as mentioned above, VR Youth Counselors continue to identify any areas of need in order to increase communication, improve the referral process and ensure students with disabilities are identified and connected to VR, as appropriate, in a timely manner.

Identified best practices include: youth counselors identifying Pre-ETS students close to graduation and assisting with their VR referrals as appropriate, LEA's and VR conferring at least one time per year to identify other students who may require VR services, those requiring a VR counselor to attend their case conference, providing "VR 101" refreshers to school personnel, and a follow-up process for VR referrals.

Training for VR staff is planned for the coming year on improvements to the referral process from Pre-ETS to VR, and transition and Pre-ETS basics to new counselors. VR counselors and/or area supervisors are also involved in local transition councils if they exist in the community. Councils are made up of local stakeholders who are involved in the transition from school to work and adult life. Councils could include, but are not limited to, students/family, school personnel, and service providers. VR has contracted with PCG on the development of training and technical assistance for pre-ETS providers and VR staff. This will include modules and other training on pre-ETS curricula, including working with high support needs students, Level Up Your Leadership training, and foundational training for pre-ETS career coaches, among many other initiatives. Additionally, DOE provided training to the Transition Advisory Council on the new alternate diploma for students with



the most significant cognitive disabilities as well as the use of supported decision making as an alternative to guardianship.

2. Describe the current status and scope of the formal interagency agreement between the VR agency and the State educational agency. Consistent with the requirements of the formal interagency agreement pursuant to 34 CFR 361.22(b), provide, at a minimum, the following information about the agreement:

A. Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services

BRS and DOE have a fully executed MOU that includes the following information:

1. DDRS will provide consultation and technical assistance to the IDOE staff in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services.
2. Consultation and technical assistance will be provided by the administrative, supervisory, and direct service delivery levels of DDRS and will occur formally and informally throughout the school year.
3. DDRS staff will be responsible for providing consultation and technical assistance to IDOE special education and transition personnel at the district and school levels, to assist IDOE transition teachers and staff in planning for transition activities. Areas of consultation and technical assistance may include information related to:
 - a. DDRS service description including pre-employment transition services
 - b. DDRS eligibility criteria
 - c. Assistive technology needs and assessments
 - d. Social Security benefits planning
 - e. DDRS referral procedures
 - f. Career exploration
 - g. Local resources for transition in addition to DDRS
 - h. Federal financial aid available for post-secondary education
4. DDRS is available to provide consultation and technical assistance to IDOE as needed throughout the year. IDOE may request consultation and technical assistance by phone, video conferencing, e-mail, mail, or on a peer-to-peer basis. DDRS and IDOE agree to provide cross-training as needed.

B. Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under section 614(d) of the Individuals with Disabilities Education Act

1. DDRS will attend meetings to facilitate transition planning, such as meetings for the development of an Individualized Education Plan (IEP) and/or Individualized Transition Plan (ITP) when invited and with sufficient notice, with appropriate consent, and as resources allow.
2. DDRS will make available to IDOE and LEA's, informational resources, such as the "Moving On...Life After High School" VR transition planning booklet, that LEA's are encouraged to



distribute) to family members, and or guardians and their representatives at all IEP meetings as part of the routine information shared.

3. DDRS, in collaboration with LEAs and local providers, will provide or arrange for the provision of pre-employment transition services to all students with disabilities identified as requiring these services.
4. DDRS shall determine the eligibility of all students with disabilities who have applied for VR services within 60 days from the date of application pursuant to section 102(a)(6) of the Rehabilitation Act and section 34 CFR 361.41(b)(1) of its implementing regulations.
5. DDRS will develop an Individualized Plan for Employment (IPE), which is consistent with, and which takes into consideration the student -participant's IEP, within 90 days of VR eligibility, unless an extension is approved

C. The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services

The responsibilities of DDRS are to serve as the lead agency in Indiana for carrying out Federal and State policies relating to the program under the Rehabilitation Act, including the following:

1. Accept referral of students with disabilities during the transition planning process for the provision of pre-employment transition services.
2. Provide consultation with school district staff on transition planning to prepare a student to move from school to work or post-secondary education in accordance with the student's unique needs as determined through the IEP process and provision of pre-employment transition services.
3. Assess, plan, develop and provide VR services for eligible individuals with disabilities who have been referred for VR services, consistent with their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice, so that such individuals may prepare for and engage in competitive, integrated employment.
4. Develop an Individualized Plan for Employment (IPE), which is consistent with, and which takes into consideration the student-participant's Individualized Education Plan (IEP), within 90 days of DDRS eligibility determination, unless an extension is approved.
5. Provide consultation to assist in the identification of eligible and potentially eligible students with disabilities and assessment of their individual needs for pre-employment transition services.
6. Provide or arrange for the provision of services required by the IPE goal, when the student has been determined eligible for VR and the services are specific to his/her employment outcome and are not services customarily provided to the student by the LEA under the Individuals with Disabilities Education Act (IDEA).
7. Provide information to parents and/or guardian(s), student-participants regarding VR eligibility, vocational assessment for employment and post-secondary planning and the Client Assistance Program (CAP).
8. Obtain written consent for the release of confidential information, pursuant to DDRS policy and procedures, federal and State laws, and regulations regarding confidentiality.
9. Provide contact information for DDRS counselors, and information related to the VR process for coordination of transition activities within each school district.



10. Share information regarding policies, procedures, guidelines, programs and services for the purpose of improving access to, and availability of, transition services.
11. Provide informational materials about the VR process and services to the school districts for distribution to the students, parents, legal guardians, teachers and others.
12. Promote employer participation in providing opportunities for work-based learning for students with disabilities.
13. As new federal or State requirements or initiatives are identified, DDRS will participate with DOE on joint training of school district and VR staff whenever possible and as applicable.
14. Inform teachers, DOE, students, legal guardians and parents of the mandates found in the Rehabilitation Act and its implementing regulations, which require the student with a disability exiting school to be referred to DDRS prior to entering subminimum wage work with a 14c certificate holder.

The responsibilities of DOE are as follows:

1. To provide technical assistance, training and reference materials regarding WIOA to school districts and other stakeholders identified by DOE, including parents, families, guardians and students relating to the provision of pre-employment transition services and other transition services. Additionally, DOE will disseminate this information to all appropriate DOE staff who work with or make decisions about Special Education Services and ensure knowledge of joint responsibilities.
2. To facilitate and coordinate the smooth transition of students with disabilities from school to post-school employment-related activities, including the receipt of appropriate pre-employment transition services, transition services, technical education and competitive, integrated employment.
3. To encourage school district and DDRS collaboration and coordination for the purpose of providing more opportunities and resources to move students from school to work (e.g., participation on local multi-agency teams, Career and Technical Education (CTE) and other opportunities for collaboration for improved pre-employment transition outcomes).
4. To encourage liaisons between the school districts or individual schools and local DDRS offices, to ensure the provision of relevant disability documentation, and/or copy of the IEP/504 for students referred with documented consent, as applicable.
5. To develop active communication and outreach efforts to make parents and students aware of coordinated transition services and opportunities. Examples are participation in the annual transition conference, career fairs, summer camps, and other vocational/educational opportunities.
6. To facilitate joint training between DDRS and appropriate school district personnel on new State or Federal requirements or initiatives that impact the provision of services by both entities, as applicable.
7. See section V, Coordination of Effort, for specifics on subminimum wage work environments and documentation requirements.

The student's Transition IEP will define the services and responsible payer for each of the services in accordance with 34 CFR 300.320(b). If DDRS/Bureau of Rehabilitation Services (BRS)/Vocational Rehabilitation (VR) Services is responsible for payment of a service, this responsibility will be described in the Individualized Plan for Employment (IPE) in accordance with 34 CFR 361.45.



1. Each Partner Agency will maximize coordination in the use of federal funds.
2. Decisions related to which entity will be financially responsible for providing transition or pre-employment transition services that can be considered both a special education and a VR service must be made at the local level as part of the collaboration between the VR agency, State educational agency, and the local educational agency. When considering and assigning the financial responsibility of each agency for the provision of transition and pre-employment transition services to students with disabilities, the Partner Agencies decision will be based, at least in part, on the following criteria:
 - a. Is the purpose of the service related to an employment outcome or education?
 - b. Is the service one that the school customarily provides under IDEA, part B?
 - c. Is the student receiving special education services 14 years or older or has entered grade 9?

D. Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals

1. Annually, DDRS, or qualified vendors, will work with LEAs so they may identify students with disabilities and potentially eligible students who need pre-employment transition services (Pre-ETS).
2. The LEA's will work to increase identification of students with disabilities, such as through conducting career fairs or planning meetings and inviting DDRS to parents' nights. Schools will refer students with disabilities for purposes of 504 or at the time the individual begins IDEA services.
3. Anyone (an LEA, nurse, parent, or student self-referral) can refer students for Pre-ETS and DDRS will work with the LEA to ensure seamless collaboration between transition services provided under IDEA and the Pre-ETS activities.
4. Annually, DDRS will provide written information regarding the availability of Pre-ETS for eligible and potentially eligible students with disabilities and the process for accessing these services.
5. Not all eligible or potentially eligible students with disabilities will require all five required Pre-ETS activities, however, all required Pre-ETS activities will be available statewide and delivered based on individual student need

E. Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment

As identified in 34 CFR Part 397.30, IDOE shall ensure LEAs document completion or refusal of transition services and provide the documentation to DDRS at the prescribed intervals. Upon transmittal of the final documentation, IDOE shall provide a "cover sheet" to DDRS itemizing the documentation that has been provided to DDRS regarding the youth. IDOE must retain copies of the documentation in a manner consistent with the requirements of 2 CFR 200.333.

F. Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.



Neither IDOE nor the LEA will enter into an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at a subminimum wage.

K. Coordination with Employers

In accordance with the requirements in section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

The VR Business and Community Engagement (BC&E) team builds relationships with employers for the purpose of sharing information and resources that will increase competitive integrated employment for individuals with disabilities. The team continues to explore strategies to expand its capacity for business engagement to increase diversity hiring opportunities for jobseekers with disabilities and meet the needs employers in their hiring efforts. Employers often seek resources around disability hiring in the form of informative and educational presentations to executive management, supervisors, and HR teams. Resources requested include information on recruiting, hiring, and retaining individuals with disabilities; creating an inclusive organization and how to ensure that all aspects of the workplace are accessible. Informational panel presentations during March Disability Awareness month and October's Disability Employment Awareness Month, sponsored by business networking organizations like SHRM and Chambers of Commerce, are very often the first point of contact in reaching employers and have resulted in requests for more information from those employers. Employers have requested specific presentations and trainings on various topics for their management and employees. Disability etiquette & awareness training for hiring managers, information on tax credits, accommodations and opportunities to network directly with jobseekers are the majority of what the employers request. In the past two years, the Indianapolis Area Work to Include coalition launched a monthly Employer Showcase that brings employers, jobseekers with disabilities and employment service providers together to network and share information. There are similar coalitions around the State doing these types of activities that result in long-term connections for jobseekers with disabilities.

As part of employer engagement, sharing information on how employers can engage youth is very popular because of the potential pipeline of talent they can build. Employers are very receptive at providing opportunities to transition age youth like employer tours, informational interviews and interview preparation. Some employers have even started to provide video tours and live virtual tours and an option to increase their outreach activities for youth and the general population.

Additionally, VR youth counselors engage with employers at the local level for the provision of work-based learning activities, including work site tours, job shadowing and work experiences. Over the last two years, a portion of pre-ETS funding has been used to provide stipends for students participating in work experiences. The availability of stipends combined with increased pre-ETS summer programming has greatly increased VR's coordination with employers at the local as well as statewide level.

L. Interagency Cooperation with Other Agencies

In accordance with the requirements in section 101(a)(11)(C) and (K), describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not



carrying out activities through the statewide workforce development system to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

1. State programs (designate lead agency(ies) and implementing entity(ies)) carried out under section 4 of the Assistive Technology Act of 1998

BRS is the grantee for the AT State grant. VR has a long-standing association with Easter Seals Crossroads Assistive Technology Center INDATA Project. The INDATA Project is federally funded through the Assistive Technology Grant and is designed to increase access to and awareness of assistive technology. INDATA's core services include: information and referral, funding assistance, public awareness and education, device demonstration, device loan, reutilized computers, and equipment reutilization. The INDATA Project is an international benchmark of success. The INDATA Project helped transform the Easter Seals Crossroads AT Center into more than just what the federal act requires. Now the AT Center has its own recording studio and broadcasts 24/7 podcasts around the world. They are known for their expertise and ability to train their staff in order to prepare each member for their national RESNA certification as an AT Provider. In addition, the INDATA Project staff provides VR Counselors ongoing assistive technology training and monthly webinars that are live streamed to VR staff. Furthermore, participants and VR staff can access the equipment loan library to test various types of equipment or borrow equipment to be used when repairs are necessary to previously purchased items. INDATA Project also partners with Centers for Independent Living, Area Agencies on Aging and Community Rehabilitation Programs (CRP) ensuring broad networking reach for persons with disabilities to understand what services are available and how they can best be utilized to assist with employment and independent living

2. Programs carried out by the Under Secretary for Rural Development of the Department of Agriculture

VR participants utilize the Indiana AgrAbility/Breaking New Ground Outreach Program located at Purdue University. This program assists farmers with disabilities to assess barriers and the need for accommodations and identify possible resources. Breaking New Ground provides outreach to rural communities across a spectrum of disabilities including spinal injuries, amputations, arthritis, back impairments, and behavioral health, making referrals to Indiana VR as appropriate. AgrAbility serves as a VR vendor to support farm modifications for VR participants.

3. Non-educational agencies serving out-of-school youth

BRS continues to be a collaborative partner with DWD for services to all individuals with disabilities, including out-of-school youth. VR also continues to partner with the Arc of Indiana and Self-Advocates of Indiana to provide Career Counseling and Information and Referral (CCIR) services to individuals employed at subminimum wage, including youth. Additionally, VR continues to support a young adult Project Search site with Cook Medical and Ivy Tech as host businesses. This site is unique in that it provides paid internship opportunities for participants.

4. State use contracting programs

BRS has assigned a designee to represent DDRS/VR on the Indiana State Use Committee, also known as the Ability Indiana Committee. The Committee continues to meet quarterly to review services, products, and employment data while monitoring new initiatives by providers. The Indiana Association of Rehabilitation Facilities (INARF) manages the program and acts in a liaison capacity to facilitate contracts with Certified Ability Indiana Organizations and the Indiana



Department of Administration. VR evaluates employment outcomes for VR participants engaged in Ability Indiana to assess whether they meet requirements for competitive, integrated employment. This is done on an individualized basis.

5. State agency responsible for administering the State Medicaid plan under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.)

VR has provided education and outreach regarding Indiana's Medicaid buy-in program (called M.E.D. Works) to support increased access to competitive, integrated employment for individuals with disabilities receiving Medicaid. Through the VR-funded Benefits Information Network (BIN), VR participants also receive information about M.E.D. Works and how this program can enable them to both work and maintain their needed Medicaid benefits. The BIN process also educates VR participants to make overall informed choices about working, providing education not only about the impact on Medicaid, but also the impact on other federal and State benefits, and the use of federal and State work incentives to assist in maximizing their employment opportunities. In 2021, VR, OMPP and Division of Mental Health and Addiction (DMHA) jointly conducted a funding gap analysis related to the delivery of Individual Placement and Support (IPS) and provided guidance to CMHC IPS early adopters on billable activities across the VR and Medicaid funding streams.

6. State agency responsible for providing services for individuals with developmental disabilities

BRS and the Bureau of Disabilities Services (BDS) are housed in the same division, the Division of Disability and Rehabilitative Services (DDRS). Additionally, VR and BDS field offices are co-located, allowing for increased collaboration in serving mutual participants, educating referrals about each program's services, and ensuring a smooth transition to extended services prior to exit from VR.

Many BDS and BRS current projects and initiatives are well aligned, including progress toward transitioning individuals from subminimum wage to competitive integrated employment, such as through BRS' Disability Innovation Fund project and BDS Waiver Redesign and System Transformation efforts. BDS has established a goal of a 15% increase in CIE outcomes for BDS participants by 2027. BRS and BDS collaboration is also threaded throughout the VR goals and priorities section, including exploration of opportunities for streamlined processes for serving mutual participants. Additional information about VR and BDS collaboration is detailed throughout the VR section of this State plan.

A representative from BDS has served on the VR Council since FFY18. BRS Leadership also presents quarterly to the DDRS Advisory Council.

7. State agency responsible for providing mental health services

VR enhanced its partnership with the Division of Mental Health and Addiction (DMHA) in 2019 through co-leading a workgroup aimed at improving employment services and outcomes to individuals with mental health disabilities. DMHA and VR also jointly submitted and were subsequently awarded several rounds of training and technical assistance through Department of Labor initiatives, including the Visionary Opportunities to Increase Competitive Employment (VOICE), and Advancing State Policy Integration for Recovery and Employment (ASPIRE) projects.

In partnership with DMHA, BRS is supporting two early adopter Individual Placement and Support (IPS) Community Mental Health Center (CMHC) sites in late 2021. DMHA Has issued a request for funding to identify up to two additional IPS early adopter sites, to begin in January 2024. As mentioned previously, BRS, DMHA and OMPP jointly developed a funding guidance document to



outline allowable braiding and sequencing of VR and MRO funds for IPS sites. Early adopter sites report that the IPS program is financially solvent due to the ability to braid and sequence these different funding sources.

Ten of the 24 community mental health centers across the State are registered employment service providers with VR for the provision of employment services including supported employment. VR Leadership has frequently been invited to present to CMHCs around the State to provide updates on VR initiatives and address questions and concerns.

8. Other Federal, State, and local agencies and programs outside the workforce development system

The Bureau of Rehabilitation Services (BRS) is the designated State entity for the Independent Living Program. BRS maintains a dedicated staff member as liaison to CILs and providers of services for independent living for older individuals who are blind (OIB program). BRS leadership and CIL Directors began quarterly meetings in 2019 to improve collaboration. This included increasing BRS knowledge of the local efforts of CILs and increasing awareness of CILs of BRS initiatives. These regular meetings have resulted in updates to contract metrics for CILs to address concerns expressed by CILs, and introduction of CILs to the LifeCourse Framework. VR makes it a priority to support the network of CILs in Indiana by providing additional funding with the use of SSA program income to support center operations in the provision of services to assist individuals with disabilities with increased independence and improved access to their communities. BRS leadership also meets regularly with Indiana Statewide Independent Living Council (INSILC) officers and attends public meetings. This increased collaboration has resulted in contract changes and improved communication.

BRS will continue to identify collaboration opportunities with the Governor's Council for People with Disabilities (GCPD), including partnering on activities during Disability Employment Awareness month, and GCPD representation on the VR Council. The GCPD executive director has also provided feedback on specific VR initiatives, such as the SE+ Disability Innovation Fund project, particularly pertaining to peer support services. GPCD has indicated the potential opportunity to support training costs for individuals who enroll in peer support specialist training

9. Other private nonprofit organizations

VR purchases an array of services from a variety of vendors who complete the vendor registration process and meet criteria to provide services. VR maintains agreements in the registration system with each vendor. There are approximately 80 employment service providers, including Rehabilitation services facilities and Community Mental Health Centers who are registered vendors with BRS, and hundreds of other vendors such as medical providers, training institutions, evaluators, rehabilitation technology providers, independent contractors, and a variety of other organizations. VR promotes participant informed choice in the selection of services and service providers. BRS modernized its provider directory to an online format to enhance the process for VR participants in making an informed choice in the selection of an employment service provider, while easing administration around timely updates to the directory. VR is also contracting with a vendor recruiter to help identify and onboard new vendors to fill service gaps across the State



APPENDIX 1: PERFORMANCE GOALS FOR THE CORE PROGRAMS

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

Include the state's expected levels of performance relating to the performance accountability indicators based on primary indicators of performance described in section 116(b)(2)(A) of the Workforce Innovation and Opportunity Act (WIOA).

	Title I – Adult Program			
	Program Year 2024		Program Year 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	78.9%		78.9%	
Employment (Fourth Quarter after Exit)	77.5%		77.5%	
Median Earnings (Second Quarter after Exit)	\$7,030		\$7,030	
Credential Attainment Rate	69.0%		69.0%	
Measurable Skill Gains	62.5%		62.5%	

	Title I – Dislocated Worker Program			
	Program Year 2024		Program Year 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	75.0%		75.0%	
Employment (Fourth Quarter after Exit)	75.6%		75.6%	
Median Earnings	\$8,219		\$8,219	



(Second Quarter after Exit)				
Credential Attainment Rate	72.0%		72.0%	
Measurable Skill Gains	62.5%		62.5%	

	Title I - Youth Program			
	Program Year 2024		Program Year 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	78.5%		78.5%	
Employment (Fourth Quarter after Exit)	79.5%		79.5%	
Median Earnings (Second Quarter after Exit)	\$3,391		\$3,391	
Credential Attainment Rate	66.5%		66.5%	
Measurable Skill Gains	66.5%		66.5%	

	Title II - Adult Education and Family Literacy Act Program			
	Program Year 2024		Program Year 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	50.0%		51.0%	
Employment (Fourth Quarter after Exit)	72.0%		73.0%	
Median Earnings (Second Quarter after Exit)	\$5,000		\$5,250	



Credential Attainment Rate	68.0%		69.0%	
Measurable Skill Gains	68.0%		69.0%	

	Wagner-Peyser Act Employment Service Program			
	Program Year 2024		Program Year 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	74.0%		74.0%	
Employment (Fourth Quarter after Exit)	69.5%		69.5%	
Median Earnings (Second Quarter after Exit)	\$7,612		\$7,612	
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable

	Vocational Rehabilitation Program			
	Program Year 2024		Program Year 2025	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Employment (Second Quarter after Exit)	60.4%		61%	
Employment (Fourth Quarter after Exit)	57.9%		58.5%	
Median Earnings (Second Quarter after Exit)	\$3,739		\$3,926	



Credential Attainment Rate	47.7%		50%	
Measurable Skill Gains	65.2%		66%	

[NOTE: DWD is awaiting the Final Rule for this measure and will update once available. See TEGL 4-23]

	All WIOA Core Programs			
	Program Year		Program Year	
	Expected Level	Negotiated Level	Expected Level	Negotiated Level
Effectiveness in Serving Employers				

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

Not applicable. Indiana is submitting a Unified State Plan.