

2016



INDIANA
WORKFORCE
DEVELOPMENT
AND ITS **WorkOne** CENTERS

Methods of Administration

Implementing Section 188 of the Workforce Innovation and Opportunity Act (WIOA)
Updated September 29, 2016



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

Michael R. Pence
Governor

September 29, 2016

Naomi M. Barry-Pérez, Director
Civil Rights Center
U.S. Department of Labor
200 Constitution Avenue NW, Room N-4123
Washington, D.C. 20210

Ms. Barry-Pérez:

The State of Indiana has reviewed its Methods of Administration (MOA) and the manner in which it is implemented. The MOA describes the actions Indiana takes to ensure adherence to Section 188 of the Workforce Innovation and Opportunity Act (WIOA) and 29 CFR Part 38. Please note that the narrative for each Element has been revised to reflect transition from the Workforce Investment Act (WIA) to WIOA and also updated in alignment with Indiana's activities since our 2014 MOA revision. Each Element's narrative is followed by supporting documentation.

As Governor of Indiana, I have reviewed and approved the 2016 Methods of Administration.

If you have questions regarding Indiana's Methods of Administration, please contact Kalena James, Indiana's WIOA Equal Opportunity Officer, at (317) 450-4227.

Sincerely,


Michael R. Pence
Governor of Indiana

Enclosures

Indiana's WIOA Equal Opportunity Contacts

State Equal Opportunity (EO) Officer:

Kalena James, State EO Officer
Regulatory Oversight & Compliance Division
Indiana Department of Workforce Development
10 North Senate Avenue, SE-304, Indianapolis, IN 46204
Phone: (317)-450-4227
TTY/TDD: (317)-234-3535
EO@dwd.in.gov

Regulatory Oversight & Compliance Division Director:

Connie Berry, Counsel/Director
Phone: (859)-620-4373
ceberry@dwd.in.gov

Regulatory Oversight & Compliance Division EO Specialist:

Jennifer Biddle, EO Specialist
Phone: (317)-232-8544
EO@dwd.in.gov

Acronyms

ADA	Americans with Disabilities Act
ADR	Alternative Dispute Resolution
CFR	Code of Federal Regulations
CMHC	Community Mental Health Center
DCR	Directorate of Civil Rights
DDRS	Division of Disabilities and Rehabilitative Services
DNR	Department of Natural Resources
DOC	Indiana Department of Correction
DOE	Indiana Department of Education
DOL/CRC	United States Department of Labor, Civil Rights Center
DVOP	Disabled Veterans' Outreach Program
DWD	Indiana Department of Workforce Development
DPN	Disability Program Navigator
EO	Equal Opportunity
FBP	Federal Bonding Program
FSSA	Indiana Department of Family and Social Services Administration
ICC	Indiana Career Connect
IHC	Indiana Health Centers, Inc.
INDOT	Indiana Department of Transportation
ING	Indiana National Guard
IN-DEI	Indiana's Disability Employment Initiative
IPAS	Indiana Protection and Advocacy Services
JAG	Jobs for America's Graduates
LEP	Limited English Proficiency
LIVS	Leader for the Implementation of Veterans' Services
LVER	Local Veterans' Employment Representatives
MOA	Methods of Administration

MOU	Memorandum of Understanding
MSFW	Migrant and Seasonal Farm Worker
OFCCP	Office of Federal Contract Compliance Programs
OJT	On-the-job-training
REA	Reemployment Eligibility Assessment
RES	Reemployment Services
RFA	Request for Application
SGA	Solicitation for Grant Applications
SMA	State Monitor Advocate
SNAP	Supplemental Nutrition Assistance Program
SSDI	Social Security Disability Insurance
SSI	Supplemental Security Income
SWIC	State Workforce Innovation Council
TAB	Technical Assistance Bulletin
TANF	Temporary Assistance for Needy Families
TDD	Telecommunication Device for the Deaf
TTY	Text Telephone
UI	Unemployment Insurance
USDOL	United States Department of Labor
VEVRAA	Vietnam Era Veteran's Readjustment Assistance Act
VR&E	Vocational Rehabilitation and Employment
VRS	Vocational Rehabilitation Services
WIA	Workforce Investment Act of 1998
WIB	Workforce Investment Board
WPRS	Worker Profiling Reemployment Services
WSA	Workforce Service Area
YHCC	Young Hoosiers Conservation Corps

ELEMENT 1

DESIGNATION OF STATE AND LOCAL EQUAL OPPORTUNITY (EO) OFFICERS



INDIANA
WORKFORCE
DEVELOPMENT
AND ITS **WorkOne** CENTERS

ELEMENT 1: Designation of State and Local Equal Opportunity (EO) Officers [29 CFR Part 38.23 through 38.28]

The Governor of Indiana has designated the Department of Workforce Development (DWD) to administer implementation of the nondiscrimination and equal opportunity provisions of the Workforce Innovation and Opportunity Act of 2014 (WIOA). The Commissioner of DWD has ultimate responsibility for administration of the WIOA EO programs in the state and, on behalf of the Governor, ensures that Indiana's Local Workforce Service Areas (LWSAs), sub-recipients, and workforce system partners comply with all federal regulations.

EO Officer Designation

In compliance with all applicable nondiscrimination requirements, DWD has designated Kalena James as the State EO Officer. In this role, she oversees the coordination, implementation, maintenance, and monitoring of the nondiscrimination and EO requirements of the U. S. Department of Labor (USDOL) regulations, 29 CFR Part 38. Ms. James reports directly to DWD's Regulatory Oversight and Compliance (ROC) Division Director Connie Berry, who reports directly to DWD's General Counsel, Jeff Gill. Ms. James reports EO and nondiscrimination matters as needed through Ms. Berry, Mr. Gill, and/or DWD Commissioner Steve Braun.

Ms. James is assisted by Jennifer Biddle, ROC Division EO Specialist, ensuring adequate staff support and resources to effectively monitor compliance with EO and Nondiscrimination provisions.

Contact information

State EO Officer:

Ms. Kalena James, State EO Officer
Indiana Department of Workforce Development
10 N. Senate Avenue, IGCS SE 304
Indianapolis, IN 46204
317-232-0603
TDD/TTY: 317-234-3535

Local EO Officers:

Local recipients appoint a senior-level employee as the Local EO Officer who may be appointed other responsibilities. However, those responsibilities will not create a conflict of interest or appearance of such with the responsibilities as a Local EO Officer. A directory of the twelve Local EO Officers is located in Attachment E1-C to this Element.

EO Officer Duties

Ms. James' designated position as State EO Officer reflects duties which ensure Indiana's compliance with Section 188 of WIOA and 29 CFR Part 38. None of Ms. James' duties present a

conflict of interest, or appearance of a conflict, with the responsibilities of an EO Officer. Ms. James' duties include, but are not limited to, the following:

- Coordinating the State EO responsibilities under 29 CFR Part 38;
- Drafting, implementing, and maintaining compliance under Indiana's Methods of Administration (MOA);
- Ensuring periodic EO and nondiscrimination compliance monitoring of WIOA Title I programs across the State;
- Reviewing state and LWSA policies to make sure those policies are nondiscriminatory;
- Providing training, technical assistance, and guidance to the local EO Officers; and
- Developing, publishing, and ensuring compliance with procedures for processing discrimination complaints; and
- Undergoing training to maintain competency.

Indiana's one-stop and American Job Centers are referred to as WorkOne centers throughout the state of Indiana. The Local EO Officers monitor the WorkOne offices in their designated regions and, on average, devote one hour per week on WIOA EO-related activities unless a matter arises that requires additional time. The Local EO Officers are responsible for, but not limited to:

- Reporting directly to the State EO Officer on matters pertaining to Section 188 of WIOA Title I.
- Conducting periodic compliance monitoring of regional WIOA Title I recipients;
- Handling regional discrimination complaints;
- Conducting Americans with Disabilities Act (ADA) surveys at the WorkOne offices;
- Reviewing their region's written policies to ensure they are nondiscriminatory; and
- Ensuring regional nondiscriminatory practices are followed.¹

Public Notice of EO Officers

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

- Formal notice to Indiana's workforce development system is disseminated through DWD Policy ²
- Contact information regarding the State EO Officer is listed on the State's website under "find an agency," which is located at http://www.in.gov/core/find_agency.html and "find a person," which is located at http://www.in.gov/core/find_person.html. Also, the

¹ Documentation section includes a representative sample of job descriptions as well as organizational charts for local EO officers.

² DWD's EO and Nondiscrimination-related policies are being revised and updated for WIOA. Policies attached at time of MOA submission are those enacted under the Workforce Investment Act (WIA).

State EO Officer's phone number and TDD are listed on page 30 of the *Unemployment Insurance Claimant Handbook*, which is located at:

http://www.in.gov/dwd/files/Claimant_Handbook.pdf

The Local EO Officers also make their identities known to applicants, registrants, eligible applicants/registrants, participants, employers, employees, applicants for employment and the public by posting notices of "Equal Opportunity is the Law" in the WorkOne offices.

The notices can be posted in languages other than English that reflect languages spoken by significant portions of the population within the relevant service area. DOL/CRC's website has a variety of posters available in different languages at:

<https://www.dol.gov/oasam/programs/crc/EOPosters.htm>

In addition, each LWSA adopts policies that conform to State policy, which ensures that the WorkOne offices are meeting the nondiscrimination and equal opportunity requirements of WIOA and 29 CFR Part 38. The adopted policies and procedures provide the region's Local EO Officer's contact information.

EO Officer Training and Support

Past Training

Indiana Local and State EO Officers had the opportunity to attend *The Third Multi-State EO Officer Training Seminar* hosted by the State of Michigan. The States of Ohio, Illinois, Minnesota and Wisconsin were invited. The one-day sessions occurred on September 12, 2014 and September 16, 2015. Representatives from the US Equal Employment Opportunity Commission (USEEOC) and the US Department of Labor, Civil Rights Center (USDOL/CRC) conducted training at both sessions. Training sessions included but were not limited to recognizing and preventing sexual harassment, assistive technologies, and web accessibility guidelines.

On July 13-14, 2016, Indiana's State EO Officer attended the National Association of State Workforce Agencies (NASWA's) Equal Opportunity Committee Meeting in Arlington, Virginia. The meeting provided sessions on disability initiatives through WIOA, compliance monitoring, data analysis, and updates from CRC. A copy of the agenda is included in the documentation section.

Planned Training

Beginning in fall 2016 Indiana will begin mandatory EO training for all Local EO Officers using the modules available through the CRC's website located

at: <https://www.dol.gov/oasam/programs/crc/moawia.htm>

The training, based on the nine elements of the MOA, will be mandatory and presented through a series of monthly conference calls that will be conducted monthly. Planned training sessions include:

- Module 1 – EO Roles and Responsibilities
- Module 2 – Providing Reasonable Accommodations
- Module 3 EO Complaint Processing Procedures
- Module 4 – EO Monitoring
- Module 5 – Data Collection and Review

Training in subsequent years will be mandatory for newly appointed EO officers only. Each year, however, all Local EO Officers will be required to attend an annual refresher training session at DWD's central office located in Indianapolis.

Conference Calls

The Local EO Officers participate in quarterly conference calls to discuss current activity within the twelve regions. Items discussed include, but are not limited to, structural and program accessibility of buildings, programs, and services to ensure equal access and integration, outreach efforts, training needs of staff, monitoring, the development and implementation of necessary policies and procedures, etc.

These conference calls are being used as a vehicle to distribute information, gain insight into training needs for Local EO Officers, and respond to questions from the field. The first call, an introductory one, was held in May 2016 and the second was held in July 2016. Minutes from both meetings are included as documentation.

Budget

The programmatic funding requests for the EO requirements are submitted to the DWD Leadership Team for review and decision. The requests include such items as document translation, brochure/poster printing, compliance monitoring visits, and professional development. The State EO Officer position is funded by WIOA Administration funds.

METHODS OF ADMINISTRATION

Element 1 Documentation

E1 – A State EO Officer Designation Letter

E1 – B State EO Officer Announcement Email

E1 – C Directory – Local EO Officers

E1 – D State EO Officer Job Description

E1 – E EO Specialist Job Description

E1 – F DWD Organization Chart

E1 – G Sample Local EO Officer Job Description & Organization Chart

E1 – H Find an Agency Website – External Way to Find EO Officers

E1 – I Search By Name – External Way to Search for EO Officers

E1 – J Claimant Handbook – Identifies State Level EO Officer

E1 – K 2014-2015 EO Training Announcements

E1 – L 2016 NASWA EO Officer Committee Meeting Agenda

E1 – M EO Conference Call Meeting Minutes



COPY

June 24, 2016

Naomi M. Barry-Perez
Director, Civil Rights Center
U. S. Department of Labor
200 Constitution Avenue, NW, Room N-4123
Washington, DC 20210

Dear Ms. Barry-Perez:

Effective February 14, 2016, Kalena F. James was designated as the Workforce Innovation and Opportunity Act (WIOA) Equal Opportunity Officer for the State of Indiana. Ms. James is responsible for implementing the non-discrimination and equal opportunity requirements of WIOA. Ms. James has consulted the WIOA Equal Opportunity toolkit provided by the Department of Labor/Civil Rights Center to familiarize herself with the responsibilities of the Equal Opportunity Officer for the State of Indiana.

I am confident this designation ensures the consistent application of the requirements of the non-discrimination and equal opportunity provisions of WIOA and complies as required under 29 CFR Part 38.

Ms. James can be contacted by phone at (317) 232-7335 or via email at KFJames@dwd.in.gov. She reports directly to Connie Berry, Counsel/Director of our Regulatory Oversight and Compliance Division. Ms. Berry can be reached at (317) 233-6078 or via email at CEBerry@dwd.in.gov.

Please contact either Ms. James or Ms. Berry with any questions regarding this designation or Indiana's Equal Opportunity compliance efforts under WIOA.

Respectfully,

Steven J. Braun
Commissioner

Michael R. Pence, Governor
Steven J. Braun, Commissioner

10 N Senate Avenue
Indianapolis, IN 46204
www.IN.gov/dwd

An Economic Development Partner

James, Kalena F

From: Berry, Connie E
Sent: Friday, March 04, 2016 4:16 PM
To: Andrea Bolinger; Cindy Gosser; Kurt Kegerreis; Linda Jones; Mary Helen Weisheit; Nora Wiergacz; R12 - Robert Harris; R2 - Sherry Szmanda-Klein; R6 - Cathy Cross; R8 - John Corcoran; Ron McKulick; Tina Overlay-Hilt
Cc: Woloshansky, Linda; gvollmer@gotoworkone.com; krandolph@workonene.org; rfeldhaus@tap.lafayette.in.us; lratliff@workonecentral.org; mrow@asgcorp.org; lisalee@workforcenet.org; slaurent@hotmail.com; kkegerris@nationalable.org; rm@wda-inc.org; jim.heck@workonesw.org; swakolbinger@employindy.org; Gill, Jeffrey M; Ashley, Regina C (DWD); Brauneller, Holly A; Mackintosh, Marie L; Frank, Joseph; Braun, Steven J; Woltjer, Cynthia; George, Cindy; James, Kalena F; Nonte, William (Bill); Brown, Thomas W; Hall, Bruce; Biddle, Jennifer; Upchurch, Carmen; Feltner, Marsha; Edge, Dinell; Gibson, Debbie
Subject: Staffing Change for State Equal Opportunity Officer
Importance: High

Local EO Officers and Regional Leads:

As most of you know, the State's Equal Opportunity Officer responsibilities have been transferred to DWD's Regulatory Oversight and Compliance Division.

Please join me in officially welcoming **Kalena James** as our new State Equal Opportunity Officer. From this point forward, please send all quarterly logs and any EO/Nondiscrimination/ADA matters directly to Kalena.

Her contact information is below:

Kalena Fitzgerald James
Equal Opportunity, Oversight Division
Department Of Workforce Development
10 N. Senate
Indianapolis, IN 46204
KFJames@dwd.in.gov
Te: 317.232.7335
Cell: 317.450.4227

Please forward this notice to anyone I may have missed and let me know if you have any questions or concerns.

Best,

Connie Berry, Counsel/Director
Regulatory Oversight & Compliance
Indiana Dept. of Workforce Development
10 N Senate Ave; IGCS SE 304
Indianapolis, IN 46204
O: 317.233.6078
M: 859.620.4373
ceberry@dwd.in.gov

Directory – Local EO Officers

Region 1 – Counties: Jasper, Lake, LaPorte, Newton, Porter, Pulaski, Starke,
Nora Wiergacz
 Human Resource Consultant
 Center of Workforce Innovations, Inc.
 2804 Boilemaker Ct., Suite E
 Valparaiso, IN 46383
 Phone: 319-462-940
 Email: nwiergacz@innovativeworkforce.com

Region 2 – Counties: Elkhart, Fulton, Kosciusko, Marshall, St. Joseph
Sherry Szmanda-Klein
 Director of Youth Services & Quality Assurances
 Northern Indiana Workforce Board, Inc.
 851 S. Marietta Street
 South Bend, IN 46601
 Phone: 574-237-9675, Ext 1140
 Email: ssklein@gotoworkone.com

Region 3 – Adams, Allen, DeKalb, Grant, Huntington, LaGrange Noble, Steuben, Wabash, Wells,
 Whitley
Andrea Bollinger
 Continuous Improvement Manager
 Northeast Indiana Works
 200 E. Main Street, Suite 910
 Ft. Wayne, IN 46802
 Phone: 260-469-44194
 Email: abollinger@ncworks.org

Region 4 – Benton, Carroll, Cass, Clinton, Fountain, Howard, Miami, Montgomery, Tippecanoe,
 Tipton, Warren, White
Tina Overley-Hill
 Executive Assistant/Financial Specialist
 Tecumseh Area Partnership, Inc.
 978 Mezzanine Drive
 Lafayette, IN 47905
 Phone: 765-807-0885
 Email: toutrlevhilt@tao.lafayette.in.us

Region 5 – Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Morgan, Shelby
Cindy Gosser
 HR Manager/Payroll Specialist
 WorkOne Central
 836 S. State Street
 PO Box 69
 Greenfield, IN 46140
 Phone: 317-462-7711, Ext. 303
 Email: cgosser@workonecentral.org

Region 6 – Blackford, Delaware, Fayette, Henry, Jay, Randolph, Rush, Union, Wayne
Lyndsey Hellems
 Associate Director
 Alliance for Strategic Growth
 201 E. Charles Street, Suite 150
 Muncie, IN 47305
 Phone: 765-282-6400
 Email: lhellems@asagcorp.org

Region 7 – Clay, Parke, Putnam, Sullivan, Vermillion, Vigo,
Mary Helen Webshelt
 Financial Manager
 Western Indiana WDB, Inc.
 630 Wabash Ave., Suite 205
 Terre Haute, IN 47807
 Phone: 812-238-5616
 Email: mwebshelt@workfourcentral.org

Region 8 – Brown, Daviess, Greene, Owen, Lawrence, Martin, Monroe, Orange,
 John Carroll
John Corcoran
 WDB Director
 Region 8 Workforce Board
 2597 W. Vernal Pike
 Bloomington, IN 47404
 Phone: 812-320-9336
 Email: ccorcoran@msn.com

Region 9 – Bartholomew, Dearborn, Decatur, Franklin, Jackson, Jefferson, Jennings, Ohio,
 Ripley, Switzerland
Maureen Wilson
 VP of Human Resources

National Able Network
 567 W. Lake, Suite 1150
 Chicago, IL 60661
 Phone: 312-994-4207
 Email: mwilson@nationalable.org

Region 10 – Clark, Crawford, Floyd, Harrison, Scott, Washington,
Ron McKulick
 Executive Director
 Region 10 Workforce Board, Inc.
 PO Box 6712
 New Albany, IN 47150
 Phone: 812-941-6427
 Email: rmckulick@workoneregion10.com

Region 11 – Dubois, Gibson, Knox, Perry, Pike, Posey, Spencer, Vanderburgh, Warrick
Linda Jones
 Financial Manager
 Grow Southwest Indiana Workforce Board, Inc.
 318 Main Street, Suite 504
 Evansville, IN 47708
 Phone: 812-492-4511
 Email: linda.jones@workonesw.org

Region 12 – Marion
Robert Harris
 General Manager – WorkOne West
 WorkOne West
 3400 Lafayette Road, Suite 100
 Indianapolis, IN 46222
 Phone: 317-246-5412
 Email: RHarris@EmplovIndy.org

TTY/TDD: The Local EO Officers utilize Relay Indiana: 800-743-3333

POSITION DESCRIPTION

Employee: Kalena James
(Program Director 1)

Position: Equal Opportunity Officer

Supervisor: Connie Berry, Counsel/Director
Regulatory Oversight & Compliance Division

Essential Functions and Responsibilities:

The function of this position is to ensure that the Department of Workforce Development (DWD), as well as all boards and one-stop operators/providers within the Local Workforce Service Areas (LWSAs) of Indiana's Workforce Investment System, comply with federal, state, and/or agency issued rules and regulations regarding equal opportunity (EO) and nondiscrimination in programs and activities funded in whole or in part under the Workforce Innovation and Opportunity Act (WIOA).

Job functions include, but are not limited to:

- Conducting EO/Nondiscrimination monitoring reviews of One-Stop Centers, affiliates and other service providers that are part of the statewide One-Stop system to ensure compliance with the provisions of WIOA;
- Developing and conducting EO training for state staff and service providers throughout the State;
- Acting as technical and enforcement consultant to LWSA EO Officers;
- Serving as liaison between DWD, the US Department of Labor (DOL), and Civil Rights Center (CRC);
- Processing and investigating discrimination complaints;
- Reviewing State-level and LWSA written policies to ensure they are nondiscriminatory;
- Developing EO/Nondiscrimination policies and procedures;
- Coordinating responsibilities under 29 CFR Part 37;
- Reporting EO matters directly to his or her Supervisor;
- Reviewing, revising, and ensuring implementation of the Methods of Administration (MOA);
- Undergoing training as needed to maintain competency;
- Other job duties within the Oversight Unit as needed.

Job Requirements include, but are not limited to:

- Broad knowledge of WIOA's entire EO/Nondiscrimination requirements;
- Extensive knowledge of all source materials and references, including Federal and State laws governing WIOA and EO/Nondiscrimination programs that are federally funded and administered by DWD and its sub-recipients;
- Working knowledge of the organization of DWD and of State and Federal agencies dealing with the CRC and DOL guidelines;
- Ability to comprehend, analyze, interpret, and correlate very technical material and develop and implement new principles and policies;
- Ability to communicate orally and in writing concerning compliance, training, and evaluation methods;
- Ability to maintain effective working relationships with Federal, State and Local agencies and personnel.

5. PERFORMANCE EXPECTATIONS/GOALS

Expectation/Results (Rank in Order of Importance)	Rating
<p>Performance Expectation #1:</p> <p>Plan, implement, report, and monitor Equal Opportunity activities in keeping with IDWD and WIOA guidelines and initiatives.</p> <p>Standard: Assists the Equal Opportunity (EO) Director in developing and maintaining a comprehensive overall strategy and action plan for monitoring EO activities in the local WorkOne offices. Assists in developing plans and status reports/metrics consistent with WIOA timelines and IDWD expectations in tracking the status of EO compliance, complaints, local office EO Officer tech support and training.</p> <p>Results:</p>	<p><input type="checkbox"/> Meets <input type="checkbox"/> Exceeds <input type="checkbox"/> Does Not Meet</p>
<p>Performance Expectation #2:</p> <p>Assist in developing and delivering training (including instructor-led and web-based formats) and information sharing/tools as part of the Oversight and Compliance Equal Opportunity Unit. As an Administrative Assistant, work with Director to determine training content, plan and training schedule.</p> <p>Standard: Planning, training and info sharing deliverables are delivered by specified deadlines. Become proficient in using training tools, technology, and learning management systems – specifically in the use of Adobe E-learning Suite and related web-based tools to develop training materials and local EO Officer help tools and in use of the PeopleSoft Enterprise Learning Management System to track training.</p> <p>Results:</p>	<p><input type="checkbox"/> Meets <input type="checkbox"/> Exceeds <input type="checkbox"/> Does Not Meet</p>
<p>Performance Expectation #3:</p> <p>When directed by Director communicate as appropriate with Business Leaders, Directors, Sponsors, Field Staff, and others to inquire, or report program status and activities.</p> <p>Standard: Develops and delivers communications that are clear to both internal and external customers. Engages customers and key stakeholders in ongoing dialogue on EO activities and enhancements. Completes communications within established deadlines.</p> <p>Results:</p>	<p><input type="checkbox"/> Meets <input type="checkbox"/> Exceeds <input type="checkbox"/> Does Not Meet</p>
<p>Performance Expectation #4:</p> <p>Become an Equal Opportunity Subject Matter Expert. Maintain ongoing updates of the IDWD policies when appropriate, when directed provide expertise and continual support to customers, local office EO Officers and key stakeholders continually.</p> <p>Standard: Brings significant programmatic and EO knowledge to communicate, input and use for training sessions with Director and EO Officers, key stakeholders, or other business unit staff. Completes assignments in timely fashion and assists Director in meeting deadlines. Responds appropriately to or escalates EO issues within one business day of submission when on duty.</p> <p>Results:</p>	<p><input type="checkbox"/> Meets <input type="checkbox"/> Exceeds <input type="checkbox"/> Does Not Meet</p>
<p>Performance Expectation #5:</p> <p>As part of the Equal Opportunity Oversight and Compliant unit, assist in developing online information tools and other materials for DWD customers and conduct employer outreach activities and opportunities.</p> <p>Standard: Participates in planning activities to encourage information sharing opportunities among customer groups. Assists in developing on-line information and delivering materials and presentations through information sessions, workshops and other outreach activities to IDWD staff and partners, and employer customer groups. Completes outreach requests within activity timelines.</p> <p>Results:</p>	<p><input type="checkbox"/> Meets <input type="checkbox"/> Exceeds <input type="checkbox"/> Does Not Meet</p>

Performance Expectation #5:

As part of the Oversight and Compliance Equal Opportunity Unit, assist Director to develop on-line information tools and other materials for IDWD customers and conduct outreach activities and opportunities to enhance WIOA EO initiatives.

Standard: Participates in planning activities to encourage information sharing opportunities among customer groups. Assists in developing on-line information and delivering materials and presentations through information sessions, workshops and other outreach activities to IDWD staff and partners, and customer groups. Completes outreach requests within timelines.

Results:

- Meets
 Exceeds
 Does Not Meet

NOTE: Failure to meet expectations for any goal or objective may result in employee being placed on a Work Improvement Plan or separation, and may result in employee receiving an Overall Performance Rating of "Does Not Meet Expectations" or "Needs Improvement."

OVERALL PERFORMANCE RATING		
<input type="checkbox"/>	Outstanding	Consistently exceeds expectations on all evaluation factors
<input type="checkbox"/>	Exceeds Expectations	Overall high performance; frequently exceeds expectations on many factors
<input type="checkbox"/>	Meets Expectations	Consistently meets the requirements of the job in all aspects
<input type="checkbox"/>	Needs Improvement	Sometimes acceptable, but not consistent; needs improvement to meet expectations
<input type="checkbox"/>	Does Not Meet Expectations	Does not meet the minimum standards of performance

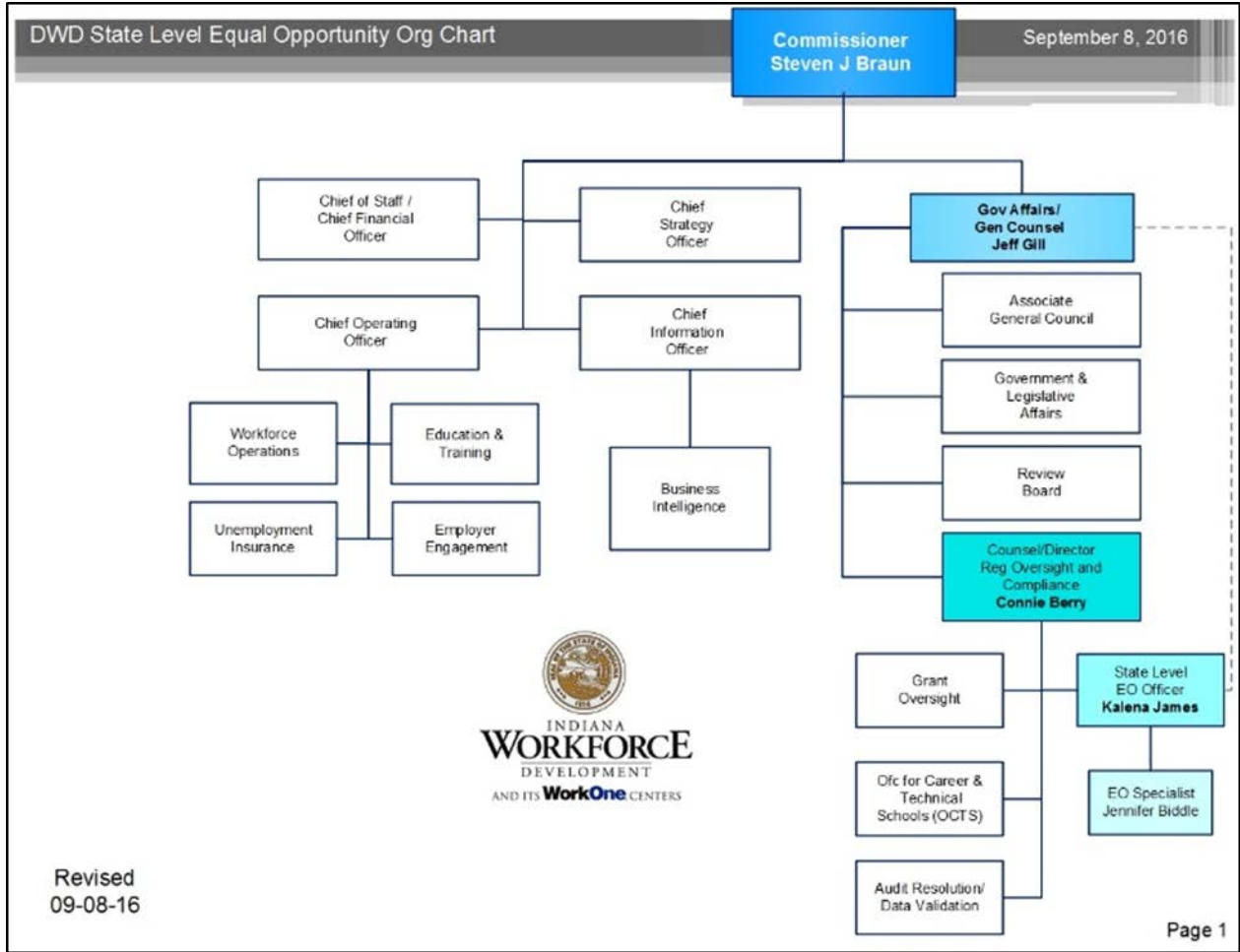
Is a Work Improvement Plan (WIP) generated as a result of this appraisal? Yes No
If so, please attach the WIP and ensure that the WIP pertains to the specific competency(s) and/or expectation(s) for which a Does Not Meet rating was given.

Is an Employee Development Plan generated as a result of this appraisal? Yes No

C – EMPLOYEE DEVELOPMENT PLAN	
Education, Experience, Licensure, Certification suggested for career enhancement:	
Personal Learning Goals:	
Developmental Objectives <i>(Knowledge/Skills/Abilities Needed to Reach Goals)</i>	Developmental Training/Assignments <i>(On-the-Job Training/Details)</i>

Purpose of Position (How does this position fit into the Organization/Division/Facility? What does this position contribute to the Organization/Division/Facility objectives?):

The primary purpose of the position is to perform administrative duties for Equal Opportunity within the Oversight and Compliance Division as part of the Indiana Department of Workforce Development's (IDWD's) Workforce Innovation and Opportunity Act (WIOA). This position is a key to the success of WIOA's initiative for IDWD who is a recipient of Federal financial assistance. Department of Labor (DOL) Equal Opportunity mandates that no individual in the United States, can be discriminated against on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief. Or against any beneficiary of programs financially assisted under Title I of the Workforce Innovation and Opportunity Act (WIOA), on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his/her participation in any WIOA Title I - financially assisted program or activity.



INTERLOCAL ASSOCIATION

Job Description

Job Title: Human Resources Manager/Payroll Specialist
Date: April 2015
Office Station: Interlocal Association Administrative Office
Supervisor: Associate Director
Status: Exempt, Professional and Technical 6

Job Summary

Incumbent is a member of the management team and is responsible for the posting of open positions, screening and interviewing potential candidates for hire. Responsibilities will include communicating and negotiating employee benefits with vendors, and administering the benefit plan. Will oversee the evaluation process for employees and direct any corrective action or disciplinary steps required. Serves as the EEO officer for IA and ensures that all hiring and employee policies are followed in keeping with EEO standards. Will assist in the payroll process, including: setting up new hires in ADP software, maintaining updated payroll information in software and in employee files, and entry of bi-weekly payroll data as required. Will verify accuracy of ADP payroll data received. May maintain time-off accrual and usage records.

Essential Job Duties

Posts open employee positions, screens resumes and arranges for interviews, assembling interview team as needed.

Works with vendors such as insurance companies to negotiate benefit plans.

Prepares all new hire paperwork and ensures employees meet all legal requirements and suitability for hire.

Conducts new hire orientations.

Updates, maintains and administers all personnel policies and ensures each employee receives a copy of the manual, as well as any subsequent updates.

Tracks and maintains employee evaluations and participates in any corrective actions or disciplinary steps needed.

Maintains all employee personnel records.

Participate in meetings at the local and state level as required.

Work with the management team in assessing training needs and assembling appropriate trainers.

Conduct meetings and workshops for staff.

Prepares needed materials for IA's bi-annual Board of Directors Meetings.

Communicates on regular basis with management team regarding any employee issues which effect WorkOne operations.

Adds new hires to ADP payroll software.

Makes required changes to employee data in software and maintains documentation supporting such changes.

Enters bi-weekly payroll information as required.

Verifies accuracy of payroll processed by ADP and troubleshoots problems.

May maintain time-off records.

Working Conditions

Works most of the time in well ventilated modern office. Performance of duties requires frequent travel within Region 5, and less frequently outside of the Region. Works standard 8:00 – 4:30, with flexibility in schedule to meet demand. Infrequent overnight travel required.

Education

Post-secondary training in Human Resources/Payroll Processes required. Certification(s) and/or degree preferred. Comparable related work experience may substitute for training.

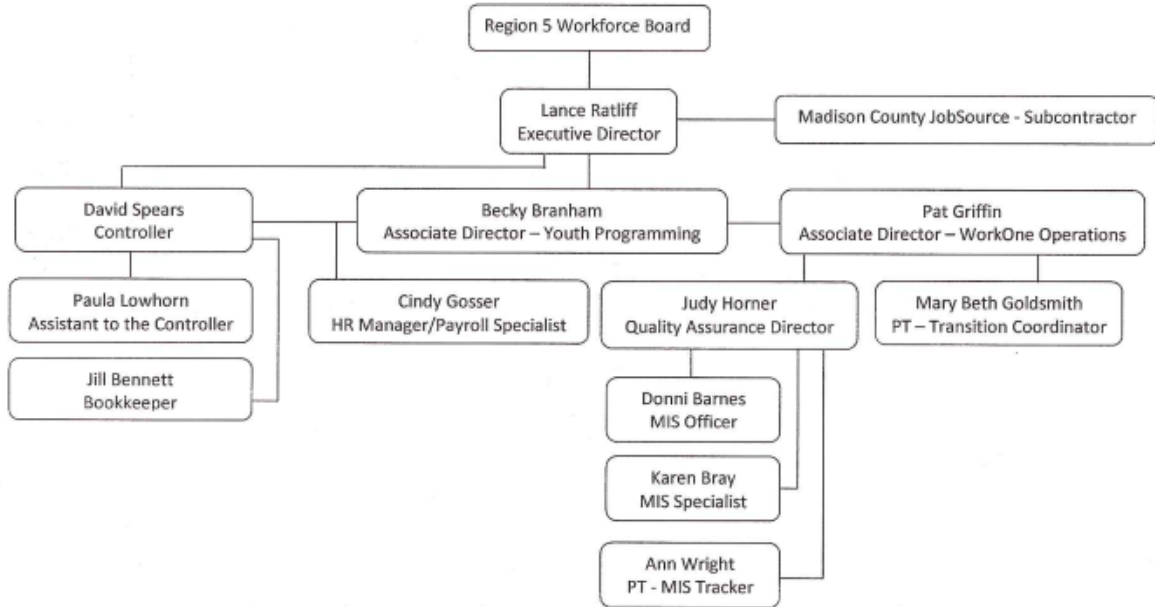
Experience

At least one year of related experience in a responsible position required.

Communication

Oral and written communication should demonstrate the ability to communicate effectively to individuals and groups.

Interlocal Association - Organizational Chart
Regional Operator
PY 2015 - 2016



Search by Name

First Name: Last Name:
in

Reverse Phone Search

Last Four Digits of Phone Number:

Search Results

James, Kalena

Title: Program Dir 2
Agency: [Department of Workforce Development](#)
Division: Oversight Div
E-mail: kjames@dwd.in.gov
Phone: 317-232-7355
Fax:
Address: 10 N Senate Ave SE 306
Indianapolis, IN 46204
[Download this Contact \(vCard\)](#)

You may download a complete copy of the State of Indiana Telephone Directory in [PDF](#) or [CSV](#) format.

MENU

BUSINESS & AGRICULTURE

RESIDENTS

GOVERNMENT

EDUCATION

TAXES & FINANCE

VISITING & PLAYING

FAMILY & HEALTH

Live Chat Help & Resources Feedback

Find an Agency

REFINE YOUR SEARCH

Residents

Most Visited | A-C | D-F | G-I | J-L | M-O | P-R | S-U | V-Z | All

AGENCIES: RESIDENTS

- Correction, Department of
- Criminal Justice Institute
- Excise Police, Indiana State
- Homeland Security, Department of
- Hoosier Lottery
- Law Enforcement Academy, Indiana
- Motor Vehicles, Bureau of
- National Guard, Indiana
- State Police
- Transportation, Department of
- Veteran Affairs, Department of
- Workforce Development, Department of
- Youth Services, Division of

Workforce Development, Department of

[Visit the DWD Home Page >](#)

Executive Director:

Steve Braun

Mailing Address:

Indiana Government Center South
10 North Senate Avenue
Indianapolis, IN 46204

Phone Number:

1-800-891-6499

Contact Email:

[Ask WorkOne](#)

Most Visited Pages:

[IndianaCareerConnect.com](#)

[Employer Services](#)

[Career Training and Adult Education](#)

[Job Seekers](#)

FOR MORE INFORMATION

For general information:

- 1-800-891-6499
- 1-317-232-7560 (TDD)
- <https://askworkone.in.gov/>

This is an equal opportunity program. Auxiliary aids and services are available upon request to people with disabilities. For information contact the EEO:

- 317-232-7355
- 317-234-3535 (TDD)



Department of Workforce Development
10 North Senate Avenue
Indianapolis, IN 46204-2277
www.in.gov/dwd




WORKFORCE DEVELOPMENT AGENCY

CHRISTINE QUINN
DIRECTOR

Memorandum

DATE: July 15, 2014

TO: Michigan Works! Association, Michigan Works! Agency Directors, Local Workforce Development Boards, Designated Local Equal Opportunity Officers and Equal Opportunity Officers from the States of Illinois, Indiana, Ohio, Wisconsin, Minnesota, and Other Interested Parties

FROM: Christine Quinn, Director 
Workforce Development Agency

SUBJECT: Multi-State One-Day Training for Equal Opportunity (EO) Officers

The Michigan Workforce Development Agency, in conjunction with the Michigan Works! Association is hosting a third multi-state EO officers training seminar on September 12, 2014. We are delighted that our colleagues from Ohio, Indiana, Illinois, Minnesota, and Wisconsin will be joining us once again for this one-day training opportunity.

Representatives from the U.S. Equal Employment Opportunity Commission (EEOC) and Transgender of Michigan will conduct this training. The training will focus on applicable laws regarding harassment; recognizing and preventing sexual harassment; prohibited employment policies and practices; and serving Transgender customers.

Federal regulations require that states provide periodic training of workforce EO officers who have the responsibility to ensure that federally funded programs and services are delivered in a non-discriminatory manner. Therefore, we expect that state and all local EO officers and contractors who are involved in enforcing Title VI and other nondiscrimination statutes imposed on agencies that receive federal financial assistance from the states will register and attend this training.

We also welcome State Equal Employment Opportunity (EEO) Officers and professionals who are involved in enforcing Title VII and other interested parties from the private sector, universities, and county and city governments to register and attend this seminar as well.



Victor Office Center | 201 North Washington Square, 6th Floor | Lansing, Michigan 48913
517.335.5858 | TTY 888.605.6722

Page 2
July 15, 2014

This training will be held at the Okemos Conference Center, 2187 University Park Drive, Okemos, Michigan 48864 beginning at 8 a.m. to 5 p.m. The registration fee is \$40 per participant. The Michigan Works! Association is coordinating additional marketing and registration activities. You may register online for this training at:
<http://www.michiganworks.org/events/2014-multi-state-equal-opportunity-training/>.

If you have any questions concerning registration, you should contact Ms. Anisa Mazuca, Executive Coordinator, Michigan Works! Association at (517) 371-1100, ext 212. Ms. Mazuca's e-mail address is mazucaa@michiganworks.org.

If you have any other questions about this training opportunity, please contact Ms. Paula Mitchell-Monroe, Director, Office of Program Review and State Equal Opportunity Officer at (517) 373-9757. Ms. Mitchell-Monroe's email address is mitchell-monroep@michigan.gov.

Last year, approximately 90 individuals attended this training. We hope to meet and exceed that number this year. We look forward to seeing you at the EO officers training on September 12, 2014!

CQ:PMM:im

cc: Michael Pohnl
Paula Mitchell-Monroe
Luann Dunsford
Anisa Mazuca

RICK SNYDER
GOVERNOR



CHRISTINE QUINN
DIRECTOR

Memorandum

e-mailed 8/17/2015 (cjb)

DATE: August 13, 2015

TO: Michigan Works! Association, Michigan Works! Agencies Directors, Local Workforce Development Boards, Designated Local Equal Opportunity Officers and Equal Opportunity Officers from the States of Illinois, Indiana, Ohio, Wisconsin, Minnesota and Other Interested Parties

FROM: Christine Quinn, Director **(SIGNED)**
Workforce Development Agency

SUBJECT: Multi-State One Day Training for Equal Opportunity (EO) Officers

The Michigan Workforce Development Agency, State of Michigan, in conjunction with the Michigan Works! Association, is hosting the fourth Multi-State EO Officers training seminar on September 16, 2015. We anticipate that our colleagues from Ohio, Indiana, Illinois, Minnesota and Wisconsin will be joining us once again for this one-day training opportunity.

Representatives from the U.S. Equal Employment Opportunity Commission and the U.S. Department of Labor, Civil Rights Center will conduct this training. The training will focus on social media and employment discrimination; discrimination complaint investigative techniques; asking, telling, using and storing disability related information; recognizing hidden disabilities/identifying strategies to assist individuals; assistive technologies; and web accessibility guidelines.

Federal regulations require that states provide periodic training of workforce EO Officers who have the responsibility to ensure that federally funded programs and services are delivered in a non-discriminatory manner. Therefore, we expect that state and all local EO Officers and contractors who are involved in enforcing Title VI and other non-discrimination statutes imposed on agencies that receive federal financial assistance from the states will register and attend this training.



Page 2 of 2
August 13, 2015

We also welcome State Equal Employment Opportunity Officers and professionals who are involved in enforcing Title VII and other interested parties from the private sector, universities, county, and city governments, to register and attend this seminar as well.

This training will be held at the Okemos Conference Center, 2187 University Park Drive, Okemos, MI 48864 beginning at 8:00 a.m. to 5:00 p.m. The registration fee is \$40.00 per participant. The Michigan Works! Association is coordinating additional marketing and registration activities. You may register online for this training at: <http://www.cvent.com/d/54qcv5/4W>.

If you have any questions concerning registration, you should contact Ms. Alyson Maas, Director of Events, Michigan Works! Association at (517) 371-1100, Ext 205. Ms. Maas' e-mail address is maasa@michiganworks.org.

If you have any other questions about this training opportunity, you should contact Ms. Paula Mitchell-Monroe, Director, Office of Program Review and State Equal Opportunity Officer at (517) 373-9757. Ms. Mitchell-Monroe's e-mail address is mitchell-monroep@michigan.gov.

Last year, approximately 80 individuals attended this training. We hope to meet and exceed that number this year. We look forward to seeing you at the EO Officers training on September 16, 2015!

cc: Mike Wurmlinger, Director, Office of Audit and Finance, WDA
Paula Mitchell-Monroe, Director, Office of Program Review and
State Equal Opportunity Officer, WDA
Luann Dunsford, Chief Executive Officer, Michigan Works! Association
Alyson Maas, Director of Events, Michigan Works! Association

NATIONAL ASSOCIATION OF
**STATEWORK
FORCE**
AGENCIES  **AGENDA**

NASWA Equal Opportunity Committee Meeting

July 13-14, 2016

**Key Bridge Marriott
Arlington, VA**

Homework: Please be prepared to share challenges and opportunities in your state.

Wednesday, July 13, 2016

7:30 – 8:30

Breakfast

8:30 – 8:45

Welcome and Introductions

Jon Pierpont (UT) | Chair, Equal Opportunity
Committee
Virginia Welcome

8:45 – 9:15

Disability Employment Initiative

David Jones | DOL, Office of Workforce
Investment

9:30 – 10:15

**WIOA from a Disability Perspective: Missouri and
NDI Partnered to Develop a 188 Guide Training
Tool**

Danielle Smith (MO)
Jamie Robinson | National Disability Institute

10:15 – 10:30

Break

10:30 – noon

State Presentation: California Compliance Monitoring of Local Areas

Ernesto Magana (CA) | Chair, Communications Subcommittee

12:00 – 1:30

Working Lunch

1:30 – 2:15

CRC Update and Roundtable Discussion

Naomi Barry-Perez | CRC Director
CRC staff

2:15 – 2:30

NASWA Update

Scott Sanders | NASWA Executive Director

2:30 – 3:30

CRC Training

Roger Ocampo | CRC Office of Compliance and Policy
(data analysis and other topics).

3:30 – 3:45

Break

3:45 – 5:00

CRC Training cont.

5:00

Recess

Thursday, July 14, 2016

7:30 – 8:30

Breakfast

8:30 – 9:30

Subcommittee Break-outs – Working Sessions

Harris Subcommittee
Communications Subcommittee
Best Practices Subcommittee

9:30 – 10:15

Committee Business

Approve Minutes
Reports from Subcommittees
Discussion of proposed regulations, comments and
technical assistance recommendations.

10:15 – 10:30

Break

10:30 – noon

Committee State Roundtable

Each state briefly presents current challenges and opportunities.

Noon

Adjourn

Conference Call with Local Equal Opportunity Officers

Thursday, May 5, 2016
9:30 AM to 11:00 AM

On the call:

Nora Wiergacz, Region 1; Sherry Klein, Region 2; Andrea Bolinger, Region 3; Tina Overley-Hilt, Region 4; Cindy Gosser, Region 5; Lyndsey Hellems, Region 6; Mary Helen Weisheit, Region 7; John Corcoran, Region 8; Rich Sewell, Region 9; Ron McKulick, Region 10; Linda Jones, Region 11; Robert Harris, Region 12; and Kalena Jones, Jennifer Biddle, and Connie Berry, DWD.

Content:

Introductions

Kalena Jones is the new State Equal Opportunity (EO) Director. She told the group about her past work history here at DWD in the Unemployment Insurance division. She then had each local EO Officer provide their work history and indicate how long they have been the local EO Officer. The range of time in the workforce development system ranges from 4 months to the 1970's (days of CETA -- Comprehensive Employment and Training Act).

Kalena also apologized for the confusion over the change in dates for this first call. In the future she will send out a Meeting Scheduled Invitation. The calls will occur quarterly. Also, attendance is mandatory and having a representative participate for you is not permitted.

Method of Administration

The State Method of Administration (MOA) is due to the feds on October 1, 2016 and covers Program Years 2013 and 2014. The MOA document describes the activities and processes Indiana has taken and will continue to take to ensure that all DWD financially-assisted programs, activities and recipients comply with the nondiscrimination and equal opportunity requirements mandated by the Workforce Innovation and Opportunity Act (WIOA).

A quick review of the 9 Elements within the MOA include:

- Element 1 – Designation of State-level and local-level EO Officers
- Element 2 – Notice and Communication
- Element 3 – Review Assurances, Job Training Plans, Contracts and Policies and Procedures
- Element 4 – Universal Access
- Element 5 – Compliance with Section 504 of the Rehabilitation Act of 1973, as amended, and 29 CFR Part 38
- Element 6 – Data and Information Collection and Maintenance
- Element 7 – Monitor Recipients for Compliance
- Element 8 – Complaint Processing Procedures
- Element 9 – Corrective Action/Sanctions

The time line schedule and review period is:

- Now until May 27 – State-level Program Directors review MOA elements for updates
- June – July – Kalena finalizes MOA
- August – Connie Berry's review
- August – September – Lead Team reviews
- September – Governor signs MOA
- September – MOA mailed

Kalena will send out to the local EO Officers:

- The Former MOA
- The MOA Power point designed by the former State EO Officer
- The NASWA Side-by-Side WIA/WIOA document

New Legislation and Regulation

- President Obama signed the *Workforce Innovation and Opportunity Act (WIOA)* law on Tuesday, July 22, 2014. The US Department of Labor, state workforce agencies, local workforce areas and other stakeholders are implementing the changes in order to be compliant with WIOA.
- Currently, the EO Regulations from the Civil Rights Center, DOL (CRC) have been only revised to reflect the change from WIA to WIOA. CRC recently published draft regulations with extensive changes. Comments were due the end of April 2016. Final regulations will be published later this year.

Changes and Challenges in the Field – Training Needs

Region 1 – What is the correct language for the EO tag line on documents? Local Officers need to know what local items need the EO tag line. Also, what is the correct wording for the EO tag line.

- Kalena will send out the “EO is the Law” poster to the Local EO Officers.

Connie Berry explained to the Local EO Officers that State staff is currently working on updating EO policies. The policies indicate the types of local items that need the EO tag line and what that wording needs to be. Jennifer Biddle indicated she would send the current EO policies with this information but that local EO Officers are to understand that they are in the process of being updated.

Regions 2, 5 and 6 indicate a need for training – what are the Local EO Officer's responsibilities? Webinars are the most favorite type of training.

- Kalena will create a schedule with training topics and publish to Local EO Officers.
- Jennifer to send out the revised Complaint Log as not all have received.
- Kalena to send out the ADA/Disability Checklist.

Region 3 – What is the policy for resolving complaints? She also received an announcement for EEOC training in Indianapolis. Have DWD seen this training and attending?



EO Conference Call

Date: July 21, 2016

Time: 9:30 AM

Participants: Nora Wiergacz, Region 1; Andrea Bolinger, Region 3; Tina Overley-Hilt, Region 4; Cindy Gosser, Region 5; Lyndsey Hellems, Region 6; Mary Helen Weisheit, Region 7; John Corcoran, Region 8; Maureen Wilson, Region 9; Connie Berry, DWD; Kalena James, DWD, Jennifer Biddle, DWD

Minutes

Kalena James, State EO Officer conducted the conference call and welcomed all participants to the call. Roll call was taken. The following topics were addressed:

Methods of Administration (MOA)

The Equal Opportunity (EO) Unit is reviewing the sections of the MOA edited by various DWD program and business units. The final MOA draft will be given to Connie Berry, Regulatory Oversight & Compliance Director by the end of July-first week of August. Connie will review and provide the MOA to the Lead Team for their review. The Governor will sign the MOA cover letter addressed to the Civil Rights Center, Department of Labor (CRC/DOL). Indiana will submit the MOA to CRC/DOL in September.

The MOA is a document describing the procedures Indiana had in place over the past two years to ensure there were no discriminatory practices as we continued implementing WIOA. Documentation of the practices were also included in the MOA. Each State has a different due date for their MOA; Indiana will submit their MOA in September. Local EO Officers do not need to prepare any documents for the MOA; however, once the MOA is submitted, DWD will begin emphasizing partnerships with Local EO Officers. The partnerships will include but not be limited to assessing local EO practices and procedures, identifying short comings, and addressing those short comings through training and conducting assessments within the regions.

Equal Opportunity (EO) Training

The EO Training sessions will begin in November, after the MOA has been submitted and will consist of nine modules. It will be conducted through conference calls that last between 1 ½ to 2 hours in length. The modules include:

- Module 1 – November 2016
 - EO Roles and Responsibilities
- Module 2 – December 2016
 - Providing Reasonable Accommodations
- Module 3 – January 2017
 - EO Complaint Processing Procedures

- Module 4 – February 2017
 - EO Monitoring
- Module 5 – March 2017
 - Data Collection and Review

An email invite will be sent soon containing the November date (actual) and the remainder training sessions dates (tentative). The EO Unit's goal is to provide

- Quarterly conference calls,
- Modular training courses for new EO Officer's
- Annual training for everyone here in Indianapolis

All EO's are required to attend the modular training scheduled for November-thru-March. After completion, the training will be designated for newly appointed EO Officers ONLY, which will be standard training for them. Each year, all EO Officers will be required to attend the annual training session here in Indianapolis.

EO Website

The EO website will be available soon and is located on DWD's website. The tentative launch date is September 2016. The website will provide but is not limited to legislation, regulations, forms, resources, training, policies and contacts. We envision it to be updated as needed, on a regular basis. Local EO Officers will be asked to provide their feedback for enhancements after launch.

EO Policies

The EO policies have been revised and are going through the internal review process. Once the policies have been released for Field review it is imperative that all EO Officer read and provide feedback.

NASWA Training

Kalena attended EO training for State EO Directors sponsored by NASWA. Of importance, NASWA is creating a committee to develop an EO training curriculum for use across the nation.

Reminders

- Several of you have not yet provided the 2nd quarter (April – June 2016) complaint logs. Please send to the EO Mailbox by Monday, July 25, 2016.
- Please use the EO Mailbox when contacting the EO Unit (EO@dwd.in.gov). You may 'cc' Kalena or Jennifer if you desire to. The EO@dwd.in.gov mailbox is the primary way of communication for our business unit.
- Reminder, attendance is required for all quarterly conference calls. If you cannot attend, someone from your region must attend in your place.

The next quarterly conference call will be held in October.

ELEMENT 2

NOTICE AND COMMUNICATION



INDIANA
WORKFORCE
DEVELOPMENT
AND ITS **WorkOne** CENTERS

ELEMENT 2: Notice and Communication

[29 CFR Part 38.29 through 38.36]

WIOA Title I Recipients must provide initial and continuous notice that they do not discriminate on any prohibited grounds. The requirement is that this notice must be provided to registrants, applicants and eligible applicants/registrants, participants, applicants for employment and employees, unions or professional organizations that hold collective bargaining agreements with the recipients, sub-recipients that receive WIOA Title I funds from the recipients, and members of the general public, including those with limited vision and hearing. CFR Section 38.29 further requires the recipient to take appropriate steps to ensure communications with individuals with disabilities are as *effective* as communications with others.

EO Notice Requirements

Recipients were advised of the requirement for conspicuous posting of the “Equal Opportunity is the Law” notice as well as the requirement to make the notice available in alternate formats for persons with visual impairments through the following DWD policies:

- DWD Policy 2012-04 entitled, “Nondiscrimination and Equal Opportunity Requirements of WIA.”
- DWD Policy 2012-05 entitled, “WIA Equal Opportunity Notice and Posting Requirements within the Workforce Investment System.”
- DWD Policy 2007-30 entitled, “Ensuring Nondiscrimination and Equal Opportunity to Persons with Disabilities Participating in Programs and Activities in the WorkOne Delivery System.”

In addition, the supplemental “Discrimination is Against the Law” poster provided by DOL/CRC is available for use by the WorkOne offices to ensure that individuals are fully informed of their right to file discrimination under WIOA.

Notices and posters must be displayed in a manner that is compliant with the Americans with Disabilities Act (ADA). Auxiliary aids and services are required to be provided when necessary. Compliance is monitored during desk and onsite monitoring reviews.

Displaying the WIOA EO Tagline and TDD/TTY

All Recipients include the following EO Tagline in recruitment brochures, pamphlets, and other publications which promote WIOA programs and activities:

“This WIOA Title I-funded program/activity is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.”

When a phone number is provided, it must be accompanied by a TDD/TTY number on all materials promoting WIOA Title I activities and programs. A 1-800 relay number is accessible in the event a TDD number is not available.

In addition, Indiana Career Connect (ICC), Indiana’s job matching system, and the “Unemployment Insurance Claimant Handbook” provide the required EO notice and list a TDD/TTY number

WorkOne Brand Policy

DWD Policy 2012-03 entitled, “WorkOne Brand Policy” provides the following guidance to the WorkOne offices regarding branding and marketing:

WIOA DISCLAIMER

All outreach materials (including letterhead) produced by DWD and its WorkOne partners must include the following disclaimer:

“This WIOA Title 1-funded program/activity is an equal opportunity employer/ program. Auxiliary aids and services are available upon request to individuals with disabilities.”

DWD Policy indicates that the ideal placement for this disclaimer is at the bottom of the page; for trifolds, brochures and booklets, the disclaimer may be placed near the bottom of the back cover. This disclaimer should be displayed in a smaller font size than the main content of the marketing piece, but shouldn’t be smaller than 6 points in order to remain legible.

Information in Languages other than English

Using the most recent statistical data, Spanish appears to be the predominant non-English language spoken by Limited English Proficiency (LEP) persons in Indiana. Based on this finding, the “Equal Opportunity is the Law” notice is available in both English and Spanish, and is disseminated to Indiana’s twelve regions.

Also, the “Discrimination is Against the Law” poster is available in Spanish on CRC’s website and can be downloaded in letter-size for use by the WorkOne full-service offices and express sites. Additional State and Federal posters, such as the Unemployment Insurance and Migrant and Seasonal Agricultural Worker Protection, are provided in English and Spanish on DWD’s website at: <http://www.in.gov/dwd/2455.htm>.

Spanish-speaking individuals can change the information provided on ICC from English to Spanish. Additional LEP services are provided at the regional level. Examples include, but are not limited to, bilingual staff, hand-held translators, English as a Second Language classes, and specialize software such as Rosetta Stone.

Telephonic and Face-to-Face Interpreter Services

DWD provided guidance via email to Indiana’s workforce development system regarding interpreter services in December 2014. When interpreter services are requested, they are provided at no charge to the client.³

³ The email provided to the field is attached.

Face-to-Face Interpretation⁴

A contract establishes hourly rates based on the language selected and provided services for the following languages: American Sign Language, Amharic, Arabic, Bosnian, Burmese, Cantonese, Czech, Dutch, Farsi, French, German, Greek, Gujarati, Hebrew, Hindi, Italian, Japanese, Korean, Mandarin Chinese, Polish, Portuguese, Punjabi, Russian, Serbian, Slovak, Spanish, Turkish, Ukrainian, Urdu, and Vietnamese.

Telephonic Interpretation⁵

A contract establishes 24hour/7day a week interpretive services. The rates are billed by the minute based on the language selected and are provided for the following languages: Acholi, Afrikaans, Akan, Albanian, Amharic, Arabic, Arakenese, Armenian, Assyrian, Azerbaijani, Azeri, Bahasa, Bajuni, Bambara, Basque, Behdini, Belorussian, Bengali, Berber, Bosnian, Bravanese, Bulgarian, Burmese, Cantonese, Catalan, Chaldean, Chaochow, Chavacano, Cherokee, Chin, Chuukese, Cree, Croatian, Czech, Dakota, Danish, Dari, Dinka, Diula, Dutch, Estonian, Ewe, Farsi (Persian), Fijian Hindi, Finnish, Flemish, French, French Canadian, Fukienese, Fula, Fulani, Fuzhou, Ga, Gaddang, Gaelic, Georgian, German, Gorani, Greek, Gujarati, Haitian Creole, Haaka, Hakka-China, Hassaniyya, Hausa, Hebrew, Hindi, Hmong, Hokkien, Hunanese, Hungarian, Ibanag, Ibo, Icelandic, Igbo, Ilocano, Indonesian, Inuktitut, Italian, Jakartanese, Japanese, Javanese, Kanjobal, Karen, Karenni, Kashmiri, Kazakh, Khmer (Cambodian), Kinyarwanda, Kirghiz, Kirundi, Korean, Kosovan, Krio, Kurdish, Kurmanji, Laotian, Latvian, Lingala, Lithuanian, Luganda, Luo, Luxembourgish, Maay, Macedonian, Malagasy, Malay, Malayalam, Maltese, Mandarin, Mandingo, Mandinka, Marathi, Marshallese, Mien, Mina, Mirpuri, Mixteco, Moldavan, Mongolian, Montenegrin, Moroccan Arabic, Navajo, Neapolitan, Nepali, Nigerian Pidgin English, Norwegian, Nuer, Oromo, Pahari, Pampangan, Pangasinan, Pashto, Patois, Pidgin English, Polish, Portuguese, Portuguese Creole, Pothwari, Pulaar, Punjabi, Quichua, Romani Vlach, Romanian, Russian, Samoan, Serbian, Shanghainese, Sichuan, Sicilian, Sinhalese, Sindhi, Slovak, Slovenian, Somali, Soninke, Sorani, Spanish, Sudanese Arabic, Sudanese, Susu, Swahili, Swedish, Sylhetti, Tagalog, Taiwanese, Tajik, Tamil, Telegu, Thai, Tibetan, Tigre, Tigrinya, Toishanese, Tongan, Tshiluba, Turkish, Twi, Ukrainian, Urdu, Uyghur, Uzbek, Vietnamese, Visayan, Wenzhou, Wolof, Yiddish, Yoruba, Yupik.

Nondiscrimination Efforts

- **DWD Central Office Orientation:** New employees are provided with copies of policies and procedures, such as *Indiana's Workplace Harassment Prevention Policy Statement* available at: <http://www.in.gov/spd/files/harasspol.pdf>. Employees must also review the State of Indiana Employee Handbook located at: <http://www.in.gov/spd/files/eehandbook.pdf>.

⁴ The Indiana Department of Administration (IDOA) established a new contract in December 2014 for Face-to-Face Interpreter services through the Language Training Center. The documentation section includes information provided to the field when requesting interpreter services.

⁵ IDOA established a new contract on January 1, 2015 for Telephonic Interpretation Services through Propio, Inc. The documentation section includes information provided to the field when requesting interpreter services.

- **WIOA Orientation:** To ensure individuals have been notified of their rights under WIOA Section 188 and 29 CFR Part 38, the WorkOne full-service offices and express sites distribute DWD Policy entitled “Nondiscrimination and Equal Opportunity Requirements for Title I of the WIA” to registrants, applicants, eligible applicants/registrants, applicants for employment, employees and interested members of the public.
 - **EO Law and Grievance Procedures (Participant File):** TrackOne, the State of Indiana’s case management system, collects and reports data for the programs administered by DWD. TrackOne receives data from Indiana Career Connect (ICC), Indiana’s job matching site/application, and collects data for applicants and participants receiving core, career and supportive services under WIOA Title I. Once an individual has been enrolled in a WIOA program or activity, he or she is required to sign a statement indicating they understand the EO law and grievance procedures and have received the EO handout notice. Once signed, a paper or electronic copy of the statement is placed in the participant’s file.
-

METHODS OF ADMINISTRATION

Element 2 Documentation

E2 – A Telephonic Communication Email

From: George, Cindy
Sent: Tuesday, December 09, 2014 10:36 AM
To: #All DWD Staff
Subject: Important Information on Interpretation Services ****New Contracts Established****

IDOA has established a new contract for FACE-to-FACE Interpreter Services. The new vendor is Language Training Center (LTC). The contact information is listed in the attachment labeled FACE to FACE Interpretation Services Information 12-8-14. This contract is effective immediately.

The current contract for Telephonic Interpreting Services is still in effect until 12/31/2014. The new vendor for Telephonic Interpreting Services is Propio. This contract will begin on 1/01/2015. See Attachment labeled Telephonic Interpretation Services Information 12-8-14.

Effective Immediately DWD Policy 2011-02 for Telephonic and Face-to-Face Interpreter Services, issued July 27, 2011 has been rescinded.

Please let me know if you have any questions.

Thanks

Barb Milligan, CPPB
Procurement Manager
Department of Workforce Development
10 N. Senate Ave., RM SE305
Indianapolis, IN 46204
Phone: (317) 232-7471
Fax: (317) 233-6710

8. Item Number: 000000000100230658 Over-the-phone interpreter scheduling assistance - **\$0.9900/per min.** Non-Spanish. No minimum. (This is only for scheduling assistance...NOT Telephonic Interpretation)

9. Item Number: 000000000100230659 Video Remote Interpreting (VRI). All languages. **\$2.9500/per min.** No minimum.

Additional Contract Detail:

- After hours pricing is in effect during any state-observed holiday, weekends beginning 5 p.m. Friday to 8 a.m. Monday.

- There is a two-hour minimum for all in-person American Sign Language interpretation appointments, including after hours. There is a one-hour minimum for all other in-person interpretation appointments, including after hours. There are no minimums for video remote interpreting (VRI) services, through which ASL and most commonly requested languages are offered.

- All ASL interpreters will hold an Indiana Interpreter Certification, and all ASL interpreters providing services at the Indiana School for the Deaf will also hold a Registry of Interpreters for the Deaf (RID) certification. The same qualifications apply to VRI services.

- For all billable time after the applicable minimums (two hours for ASL and one hour for all other in-person interpreters), the State will be billed at the appropriate hourly rate in 15-minute increments, rounded to the nearest 15 minutes, plus mileage (.44 cents per mile). In the event an interpreter is required to appear in court to testify as a witness and the State agency serviced has provided prior approval, the Contractor may only invoice for the amount of time the interpreter was required to appear. However, in the case of ASL interpreters, the Contractor may invoice for the two-hour minimum, plus any additional time beyond two hours during which the interpreter was required to appear. With prior State approval, the Contractor may bill for all mileage (to and from the destination) for all assignments within 50 miles (one way) of the interpreter's starting point. For appointments more than 50 miles away, the Contractor may bill for travel time at the applicable hourly rate, in 15-minute increments, rounding to the nearest 15 minutes. Travel time will not count towards per-appointment minimums.

- VRI (Video Remote Interpreting) services are available on demand, 24/7. These services are Web-based and require only a high-speed Internet connection, webcam and computer. This is not yet available on mobile devices but will be sometime in 2015.

- Per-minute pricing for VRI and over-the-phone appointment assistance may be rounded to the nearest half minute.

- For in-person interpretation services, both the State and the interpreter shall sign a timesheet attesting to the length of the provided service or any cancellation. The interpreter shall provide the State a copy of the timesheet prior to the interpreter's departure.

- The Contractor may bill for two hours for an ASL appointment cancelled less than 48 hours prior to the appointment time, assuming the appointment was made more than two days in advance. If the appointment was made less than 48 hours in advance but greater than 24 hours in advance, at least 24 hours notice must be given to avoid this charge. This does not apply to unforeseen closures to State offices (e.g. weather-related closures).

- The Contractor may bill for one hour for all non-ASL in-person appointments cancelled 24 hours prior to the appointment time. This does not apply to unforeseen closures to State offices (e.g. weather-related closures).

Contract Information: Language Line Services for TELEPHONIC Interpreter Services OPA # 11717

Please note that the State's telephonic interpretive services QPA with Language Line is active through 12/31/14.

The Telephonic Interpretation contract establishes 24 hour /7 day a week interpretative services. The rates are billed by the minute based on the language selected. The Contractor has educational materials, and provides awareness training, to assist those interacting with Limited English Proficient persons (for example, cards to communicate that interpretative services are being provided at no cost to the person). The Contractor also provides, upon request, telephone receiver splitters, and four-way conference calling at no additional cost.

If you should have any questions or issues with this contract, please contact JoAnn Palmer at (317) 232-6706 or email her at jpalmer@dwd.in.gov.

1. 000000000100115538 Interpretation Telephonic Spanish **\$0.7400 per min**
2. 000000000100115539 Interpretation Telephonic non-Spanish **\$1.0800 per min**

To access services:

WHEN RECEIVING A CALL:

1. Use "Conference Hold" to place the limited English speaker on hold.
2. Dial: 1-866-874-3972
3. Enter on your telephone keypad or provide the representative:
 - . 6-digit Client ID: 5 2 1 3 2 0
 - . Press 1 for Spanish
 - . Press 2 for all other languages and speak the name of the language you need at the prompt.An Interpreter will be connected to the call.
4. Brief the Interpreter. Summarize what you wish to accomplish and give any special Instructions.
5. Add the limited-English speaker to the line.
6. Say "End of Call" to the Interpreter when the call is completed.

WHEN PLACING A CALL:

When placing a call to a limited English speaker, begin at Step 2. If you need assistance placing a call to a limited English speaker, please inform the Interpreter at the beginning of the call.

NEW CONTRACT INFORMATION:

A new vendor, Propio, is planned to begin providing telephonic translation services on 01/01/2015. Pricing for this new QPA is shown below. Additional information will be sent out as soon as it's available.

Language	UOM	Price
Spanish	minute	\$ 0.56
Spanish (after hours)*	minute	\$ 0.56
All other languages	minute	\$ 0.73
All other languages (after hours)*	minute	\$ 0.73

ELEMENT 3

REVIEW ASSURANCES, JOB TRAINING PLANS, CONTRACTS, AND POLICIES
AND PROCEDURES



INDIANA
WORKFORCE
DEVELOPMENT
AND ITS **WorkOne** CENTERS

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

[29 CFR Part 38.20]

Indiana ensures compliance with 29 CFR Part 38.20 and 38.54(d)(1)(i) and (d)(2)(i), (iii), and (iv) regarding the review of assurances, job training plans, contracts and policies and procedures by:

- requiring that all WIOA Title I grant applicants and Recipients agree to the EO assurance language prescribed by Part 38.20;
- monitoring all Recipients for programmatic and architectural accessibility;
- reviewing job training plans, contracts, policies and procedures at the state and local level to ensure they are nondiscriminatory and include the required assurances; and
- developing WIOA Title I EO and nondiscrimination policies in a timely manner.

Assurances via Grant Agreement

Indiana requires that all WIOA Title I grant applicants and Recipients agree to the assurance language prescribed within Part 38.20. This language is included in each WDB WIOA Title I grant agreement via a statement that each party must “fully comply with the nondiscrimination and equal opportunity provisions of Section 188 of WIA and its implementing regulations at 29 CFR Part 38.”

The grant agreements also requires the parties to assure the following:

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

Assurances via Policy

DWD Policy 2012-04 “Nondiscrimination and Equal Opportunity Requirements of WIA” requires the inclusion of the EO assurance language in all contracts grants, cooperative agreements, applications, or other arrangements.

DWD Policy, in compliance with Part 38.20(a)(2), informs all recipients that this nondiscrimination assurance is considered incorporated by operation of law in the grant, cooperative agreement, contract, or other arrangement whereby Federal financial assistance under WIA (WIOA) Title I is made available, whether or not it is physically incorporated in such document and whether or not there is a written agreement between the DOL and the recipient, or between the DOL and the Governor, between the Governor and the recipient, or between recipients.

The assurance also may be incorporated by reference in such grants, cooperative agreements, contracts, or other arrangements. The WDBs have adopted the required assurance language, either entirely or by reference, as required by the regulations.

Assurance via State Plan

Indiana's former Integrated Workforce Plan (WIA) and draft Unified State Plan (WIOA) contain the following assurance language:

- The state ensures that outreach is provided to populations and subpopulations that can benefit from WorkOne Career services;
- The state implements universal access to programs and activities to all individuals through reasonable recruitment targeting, outreach efforts, assessments, service delivery, partnership development, and numeric goals.
- The state complies with the nondiscrimination provisions of Section 188, including that the Methods of Administration were developed and implemented.
- The state collects and maintains data necessary to show compliance with nondiscrimination provisions of Section 188.
- The state has designated at least one person in each state or federal employment office to promote and develop employment opportunities, job counseling, and placement for individuals with disabilities.

Assurance Reviews

DWD's Regulatory Oversight and Compliance monitoring team periodically review each LWSA's contracts, policies, and other agreements to ensure they are nondiscriminatory and that they include all required EO assurances. The monitoring team and EO staff provide technical assistance as needed and conduct periodic desk audits to monitor each LWSA's compliance with EO and nondiscrimination requirements. Some elements monitored include: onsite structural accessibility, parking for individuals with disabilities, designated restrooms, appropriate signage, program accessibility, and effective communication with persons with disabilities.⁶

⁶ A copy of the "Contract Review Guide" used by the monitors is included in the documentation section. Policies listed are in process of revision for WIOA.

METHODS OF ADMINISTRATION

Element 3 Documentation

E3 – A PY14 WIA Grant Boilerplate for Nondiscrimination

E3 – B PY15 WIOA Grant Boilerplate for Nondiscrimination

E3 – C PY14-15 Contract Language for Nondiscrimination

E3 – D PY14 Monitoring Contract Review Worksheet

E3 – E PY15 Monitoring Contract Review Worksheet

WIA Grant Boilerplate – PY'14

Nondiscrimination: Pursuant to the Indiana Civil Rights Law, specifically including IC 22-9-1-10, and in keeping with the purposes of the federal Civil Rights Act of 1964, the Age Discrimination in Employment Act, and the Americans with Disabilities Act, the Grantee covenants that it shall not discriminate against any employee or applicant for employment relating to the Grant with respect to the hire, tenure, terms, conditions or privileges of employment or any matter directly or indirectly related to employment because of the employee or applicant's : race, color, national origin, religion, sex, age, disability, ancestry, status as a veteran, or any other characteristic protected by federal, state, or local law ("Protected Characteristics"). Furthermore, the Grantee certifies compliance with applicable federal laws, regulations, and executive orders prohibiting discrimination based on the Protected Characteristics in the provision of services.

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

- A. **Equal Opportunity Assurances:** The parties to this Grant Agreement assure that each will fully comply with the nondiscrimination and equal opportunity provisions of Section 188 of WIA and its implementing regulations at 29 CFR Part 37. These regulations prohibit discrimination because of race, color, religion, sex, national origin, age, disability, or political affiliation or belief in both participation and employment. In the case of participants only, it prohibits discrimination based on citizenship, or his or her participation in any WIA Title I-financially assisted program or activity.
- B. **Discrimination Complaint Procedures:** The parties to this Grant Agreement will assure those complaints alleging discrimination on any of the above bases will be processed in accordance with 29 CFR Part 37.76 *et seq.* and DWD policy 2012-04 and 2012-05, as well as any subsequent DWD policy which rescinds and replaces these, developed pursuant to this section and approved by the U.S. Department of Labor's Civil Rights Center.
- C. **Accessibility and Reasonable Accommodation:** Pursuant to 29 CFR Part 37.7 through 37.10, the parties to this Grant Agreement will assure that the following is provided in the One-Stop delivery systems:
- (1.) Facilities and programs which are architecturally and programmatically accessible;
 - (2.) Reasonable accommodations for individuals with disabilities;
 - (3.) Cost allocation method for making reasonable accommodations (i.e., shared or paid by one entity).
- D. **Obligation to Provide Notice:** The parties to this Grant Agreement will provide ongoing and continuing notification that it does not discriminate on any of the prohibited basis in accordance with 29 CFR Parts 37.29 through 37.34 of the implementing regulations for Section 188 of WIA.

WIOA Grant Boilerplate – PY'15**1. Nondiscrimination**

Pursuant to the Indiana Civil Rights Law, specifically including IC 22-9-1-10, and in keeping with the purposes of the federal Civil Rights Act of 1964, the Age Discrimination in Employment Act, and the Americans with Disabilities Act, the Grantee covenants that it shall not discriminate against any employee or applicant for employment relating to the Grant with respect to the hire, tenure, terms, conditions or privileges of employment or any matter directly or indirectly related to employment because of the employee or applicant's : race, color, national origin, religion, sex, age, disability, ancestry, status as a veteran, or any other characteristic protected by federal, state, or local law ("Protected Characteristics"). Furthermore, the Grantee certifies compliance with applicable federal laws, regulations, and executive orders prohibiting discrimination based on the Protected Characteristics in the provision of services.

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

- A. **Equal Opportunity Assurances:** The parties to this Grant Agreement assure that each will fully comply with the nondiscrimination and equal opportunity provisions of Section 188 of WIOA and its implementing regulations. These regulations prohibit discrimination because of race, color, religion, sex, national origin, age, disability, or political affiliation or belief in both participation and employment. In the case of participants only, it prohibits discrimination based on citizenship, or his or her participation in any WIOA Title I-financially assisted program or activity.
- B. **Discrimination Complaint Procedures:** The parties to this Grant Agreement will assure those complaints alleging discrimination on any of the above bases will be processed in accordance with applicable WIOA regulations and DWD policy 2012-04 and 2012-05, as well as any subsequent DWD policy which rescinds and replaces these, developed pursuant to this section and approved by the U.S. Department of Labor's Civil Rights Center.
- C. **Accessibility and Reasonable Accommodation:** Pursuant to applicable WIOA regulations, the parties to this Grant Agreement will assure that the following is provided in the One-Stop delivery systems:
 - 1) Facilities and programs which are architecturally and programmatically accessible;
 - 2) Reasonable accommodations for individuals with disabilities;
 - 3) Cost allocation method for making reasonable accommodations (i.e., shared or paid by one entity).
- D. **Obligation to Provide Notice:** The parties to this Grant Agreement will provide ongoing and continuing notification that it does not discriminate on any of the prohibited basis in accordance with applicable regulations for Section 188 of WIOA.

Contract Language for PY'14 and PY'15**Nondiscrimination.**

Pursuant to the Indiana Civil Rights Law, specifically including IC §22-9-1-10, and in keeping with the purposes of the federal Civil Rights Act of 1964, the Age Discrimination in Employment Act, and the Americans with Disabilities Act, the Contractor covenants that it shall not discriminate against any employee or applicant for employment relating to this Contract with respect to the hire, tenure, terms, conditions or privileges of employment or any matter directly or indirectly related to employment, because of the employee's or applicant's race, color, national origin, religion, sex, age, disability, ancestry, status as a veteran, or any other characteristic protected by federal, state, or local law ("Protected Characteristics"). Contractor certifies compliance with applicable federal laws, regulations, and executive orders prohibiting discrimination based on the Protected Characteristics in the provision of services. Breach of this paragraph may be regarded as a material breach of this Contract, but nothing in this paragraph shall be construed to imply or establish an employment relationship between the State and any applicant or employee of the Contractor or any subcontractor.

The State is a recipient of federal funds, and therefore, where applicable, Contractor and any subcontractors shall comply with requisite affirmative action requirements, including reporting, pursuant to 41 CFR Chapter 60, as amended, and Section 202 of Executive Order 11246.

ELEMENT 4

UNIVERSAL ACCESS



INDIANA
WORKFORCE
DEVELOPMENT
AND ITS **WorkOne** CENTERS

ELEMENT 4: Universal Access

[29 CFR Part 38.43]

Recipients must take appropriate steps to ensure they are providing universal access to participants according to DWD Policy 2012-04 entitled, “Nondiscrimination and Equal Opportunity Requirements of WIA.” These steps should include reasonable efforts to include members of both sexes, various racial and ethnic groups, individuals with disabilities and individuals in differing age groups.

Indiana’s WorkOne offices strive to serve a broad range of customers through outreach efforts and other uses of partner resources. Such efforts include community outreach, job fairs, job information centers, posters, fliers, and brochures that promote WIOA Title I programs and activities. WorkOne full-service centers and express sites must include the following WIOA EO tagline on any WIOA outreach materials:

“This WIOA Title I-funded program/activity is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.”

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

Demographic Assessment

Hoosiers by the Numbers is a website that provides LWSAs with a tool to identify the diversity in their respective regions. Demographic data targets populations by age, race, and ethnicity. Local demographic information assists the local regions in their diversity planning and services development.

Outreach Efforts

The full range of employment and training services delivered through Indiana’s WorkOne system is accessible to, and meets the needs of, specific populations. Such populations include: dislocated workers, displaced homemakers, low income individuals, migrant and seasonal farm workers, women, minority individuals, individuals training for non-traditional employment, veterans, public assistance recipients, and individuals with multiple barriers to employment, including older individuals, people with limited English-speaking proficiency, and people with disabilities.

Examples of outreach efforts for specific populations:

Limited English Proficient

Individuals who do not speak English as their primary language and who have a limited ability to read speak write, or understand English can be classified as limited English proficient (LEP). Various services are offered within the twelve (12) regions including but not limited to, bilingual staff, hand-held translators, English as a Second Language classes, and software such as Rosetta Stone.

DWD Policy 2011-02 entitled, "Policy Guidance for Ensuring Access to Services for Individuals with Limited English Proficiency" provides guidance to grant recipients in serving LEP individuals.

In December 2014, the IDOA extended an existing contract for Interpreter Services for Indiana's workforce development system. Please see Element 2 for complete information.

Migrant and Seasonal Farm Workers

The State Monitor Advocate (SMA) provides technical assistance to staff of the WorkOne system, including training on referral of migrant and seasonal farm workers (MSFW) to agricultural and non-agricultural job orders and coordination of services for the MSFW Outreach function.

Proteus, Inc. has served as the MSFW Outreach service provider since November 2013 and is also the the WIA/WIOA Section 167 grantee Proteus anticipates making contact with about 950 farm workers in PY 2016-2017. Data supplied by Proteus indicates they envision providing Worker Pesticide Safety training to approximately 850 farm workers while 100 will receive NFJP training or direct placement. Tools to conduct outreach include: personal contact and program presentations at WorkOne offices, community colleges, and two-year institutions. Promotional materials will also be distributed throughout the State, including those locations.

Proteus Outreach staff consists of six workers: Kokomo -3; South Bend – 1; Columbus – 1; and Vincennes – 1. Of the approximate 8,000 MSFW in the State last year, Outreach workers were able to identify 3,900 farm workers and their dependents. Outreach staff will continue to seek out and locate small pockets of workers in isolated areas of the State in order to increase the ability of MSFW to access core career, and training services in the One-Stop system. The level of Wagner-Peyser funding provided to Proteus to be used for Outreach activities during the fiscal year is expected to be \$30,000.

DWD anticipates providing Outreach staff with updated brochures on migrant and seasonal farm worker services available from DWD. These brochures will also be posted in the licensed labor camps and the Outreach offices. Additional opportunities for Outreach staff include: working with crew leaders and employers in creating an awareness of the services available in filling openings, crew leader registration, and interpretation/translation services that can be found with the local office. Referrals are made as needed for job search, placement assistance, or other needs with which DWD can assist.

Approximately 45 licensed temporary labor camps and 20 other farm worker employers throughout Indiana represented supplementary contact prospects. A data summary report is provided to DWD and other funding sources at the end of every migrant season, as well as an annual report. These reports are a compilation of all the information gathered from farm workers through the outreach, intake and referral/assessment process.

Dislocated Worker

Dislocated Workers have access to core services through Indiana's WorkOne offices. When a plant is closing or there is going to be a substantial layoff, the WorkOne offices provide Rapid Response Services, including how to apply for unemployment insurance, job search assistance, and job referral and resume assistance, veterans' assistance, and re-training/education benefits. After Rapid Response Orientation, assistance that is more specific can be provided to the dislocated workers, if needed. One-on-one assistance, group career workshops, and other assistance such as skills assessments, job counseling, career planning, and re-training are available through the WorkOne Centers.

Employment Barrier

Technical Assistance Bulletin (TAB) 2008-07, Change 1 explains DWD's Federal Bonding Program (FBP). FBP provides fidelity bonding insurance to employers for coverage of job applicants who are qualified for employment but who fail to secure jobs because regular commercial bonding is denied. The program may provide coverage for a person who is considered a "high-risk" by an employer such as: an individual with a criminal history, youth at-risk, past history of substance abuse (alcohol and/or drug abuse), recipient of public assistance such as TANF or SNAP, having a poor credit record; has declared bankruptcy, or been dishonorably discharged from the military. The applicant must have a firm offer of employment and bonding must be a reasonable requirement for the position.

Youth: Jobs for America's Graduates (JAG)

Indiana has implemented a statewide multi-year drop-out prevention program targeting at-risk high school juniors and seniors. An advisory group consisting of a JAG Program Specialist, high school counselors and administrators, and workforce program managers selects thirty-five (35) to forty-five (45) students per program. A program can consist of multi-year students, juniors and seniors, or only juniors or seniors. Students who have low academic performance, excessive absences, disciplinary referrals, low or no work experience, and low marketable occupational skills are selected for the program. Indiana also supports the JAG out-of-school model for students working toward their High School Equivalency Diploma. More than 5,000 students were served during the 2015-2016 school year.

The JAG State Career Development Conference was held March 14, 2016 at Ivy Tech Community College in Indianapolis. Ivy Tech hosted the event providing the students the opportunity to visit the campus and compete in employability skills events. Twelve (12) regional conferences were held and students earned their chance to compete at the state conference. The state conference featured competitive events designed to demonstrate the employability skills learned through the JAG competencies and through employer and

community connections. More than one hundred (100) schools participated in the Regional Career Development Conference with over five hundred (500) JAG students attending. Each workforce region recruited judges from business and community leaders for the conference. At the state conference, one hundred and fifty (150) students competed with thirty-nine (39) students receiving awards totaling \$26,200 toward post-secondary education or training.

Veterans General Services

- ***Jobs for Veterans State Grant (JSVG)***

DWD operates the Department of Labor's JSVG Grant. DWD Policy 2015-08⁷ explains priority of service for Veterans and eligible spouses. DWD Policy 2015-09⁸ explains required roles and responsibilities for Disabled Veterans' Outreach Program (DVOP) Specialists and Local Veterans' Employment Representatives (LVER) in DWD's integrated WorkOne full-service centers and express sites. Upon entry into a WorkOne office, Veterans and eligible spouse customers should be identified and allowed to move ahead of non-eligible persons in line. Veterans and eligible spouses cannot "bump" someone from an already filled training slot; however, "Priority of Service" signs are displayed in WorkOne offices where Veterans are served. Customers with visual impairments must be asked if they are a Veteran or eligible spouse.

The DVOP Specialists facilitate intensive services to Veterans with significant barriers to employment and/or special training needs. These services include conducting an assessment, developing a plan of action that is documented, providing career guidance, coordinating supportive services, making job development contacts, providing referrals to training, and making referrals to job openings.

The LVER conducts employer outreach and facilitates employment, training, and placement services furnished to Veterans. These services focus on outreach to employers, career fairs, employer workshops, job development, and training assistance services.

- ***Priority of Service***

All staff in the WorkOne offices provide Veteran priority of service. This is most evident when staff refer individuals to job orders posted on ICC. ICC also allows the user to self-identify as a veteran. WorkOne staff contact Veterans for referral before non-Veterans, within the systems' "Veteran Hold" only, 24 hours of receiving the job order.

- ***Specialized Staff***

DWD has sixty-one (61) funded Veteran staff positions divided between DVOPs and LVERs to serve Veterans and eligible spouses throughout the State. DWD provides statewide services to several thousand Veterans through operations at full-service and express WorkOne Centers, and the Regional Veterans Administration (VA) Office in

⁷ Documentation section includes copy of DWD Policy 2015-09.

⁸ Documentation section includes copy of DWD Policy 2015-08.

Indianapolis.

Veteran Special Needs

Specific groups of Veterans, such as the Indiana National Guard, the disabled, the homeless, the unemployed, and the incarcerated/previously incarcerated are provided services designed to meet their specific needs. Information about these programs follow:

- ***Yellow Ribbon Program***

DWD has continued its agreement with USDOL to provide employment, unemployment, reemployment, and training services to National Guard soldiers returning from deployment and demobilizing throughout Indiana. Under this program, JVSG staff provides the following services in cooperation with the Indiana Department of Veteran Affairs and Indiana National Guard:

- Assistance in locating WorkOne offices and Veteran staff contact information;
- Informational services in regards to soldiers' Federal rights; and
- Enrollment, resume, interview and job search assistance.

In addition, LVERs and DVOPs provide continuous support services throughout the year to the Indiana National Guard Yellow Ribbon Program, including support services for the Indiana Air National Guard units in Fort Wayne and Terre Haute.

- ***Vocational Rehabilitation and Employment (VR&E) Services (Chapter 31)***

Chapter 31 is a unique program designed specifically for disabled Veterans. It has two primary goals: 1) to assist the service-disabled Veteran to prepare for, obtain, and maintain suitable employment; and 2) for those Veterans who are severely disabled and for whom gainful employment is not an option, assistance may be provided to allow the Veteran to live more independently in his or her community. During Program Year 2015, 48 Veterans participated in this program. Under this program, WorkOne staff initially refer qualified disabled Veteran candidates to the program. Additionally, WorkOne staff can help Veterans with Labor Market Information throughout the entire Chapter 31 process. Finally, DVOPs provide intensive services and case management services to Veterans entering the "job ready" employment phase of the rehabilitation process.

- ***DWD's JVSG and HIRE Efforts***

JVSG staff partner with DWD's Hoosier Initiative to Re-entry (HIRE) program. Specialists provide intensive services to our Hoosier offender population. As of May 2016, several DVOPs have completed a specialized certification to become Offender Workforce Development Specialists from the National Institute of Corrections. The 180-hour course helps the DVOP to better serve this population. This program continues in 2017 with the DVOP coordinating service delivery with WorkOne offices throughout the state for Veterans upon release. Additionally DWD has several DVOPs who specialize in

working with the unique barriers faced by incarcerated and homeless Veterans.

- ***Veterans' Career Fair***

DWD, the VA and several Workforce Development Boards (WDB) supported unemployed Veterans or those seeking different employment through a Veterans' career fair. The career fair entitled, Operation Hire a Hoosier Veteran, occurred on April 20, 2016 and was attended by several hundred Hoosier Veterans. In preparation for the career fair, an integrated workshop was conducted by Rolls Royce. The workshop included presentations on resume preparation, professional work attire, and interviewing skills. The concept of Veteran-focused workshops plus the cooperation and coordination among WDBs proved to be a success. Such workshops will become a standard procedure prior to other Hoosier Veteran Career Fairs. Approximately 170 vendors, which included various employers and area post-secondary institutions, participated in the event.

DWD and the Indiana Department of Veteran Affairs have partnered to provide 11 Community Outreach Events throughout the State of Indiana. These events include: employers that are ready to hire, and Veteran/civic agencies that provide benefits.

- ***Section 503 and Vietnam-Era Veterans Readjustment Assistance Act (VEVRAA)***

Training has been provided to DWD's Lead Team and WSA staff members on the regulation changes for Section 503 and VEVRAA. Training has been provided to Business Service staff and ICC staff through various means such as leadership conferences and conference calls hosted by the Office of Federal Contract Compliance Programs (OFCCP). IN-DEI staff members also trained WorkOne staff and met with employers to discuss the Final Rule and the hiring of qualified individuals with disabilities. Additionally, the two types of Veteran staff, DVOP Specialists and LVERs, have been informed of VEVRAA and will continue to educate and implement this Act throughout the year.

Efforts to Special Populations

The Local WorkOne offices provide services to special populations with special needs:

- ***Services to Incarcerated and Previously Incarcerated Individuals***

In December 2011, DWD undertook the planning process of developing a reentry program in partnership with the Department of Corrections (DOC). In March 2012 operations began, and since that time, DWD has hired ten (10) Reentry Employment Coordinators. These individuals have been trained and received certification from the National Institute of Corrections as Offender Workforce Development Specialists.

Through the partnership with DOC, the Reentry Employment Coordinators work with individuals both pre-and post- release to prepare them for the workplace and expectation of today's employers. The training process includes more than thirty (30) hours of work readiness, soft-skill and career exploration activities. Upon release, the

Reentry Employment Coordinator works with area employers to find suitable and sustainable employment. To-date, DWD has been able to place well over 6,000 formerly incarcerated individuals.

- ***Re-Employment Services & Eligibility Assessment (RESEA) and Jobs For Hoosiers (JFH)***

In April of 2016, Indiana's Reemployment Services Programs: Reemployment Eligibility Assessment (REA) and Worker Profiling Reemployment Services (WPRS) transitioned into the USDOL's new RESEA program. The new RESEA program is still an unemployment insurance (UI) - based USDOL program and continues to be a renewable yearly grant-funded program. RESEA was designed to assist UI claimants through early intervention to aid in a quicker return to meaningful employment, eliminate UI fraud, and provide a savings to the unemployment insurance fund. The individuals selected for participation in either RESEA or JFH are deemed likely to exhaust their UI benefits before finding meaningful employment, if not given additional guidance and/or training.

Indiana's RESEA program is two-fold. "Initial RESEA" claimants are selected from a pool of eligible, non-job-attached claimants upon filing the fourth (4th) week of their UI claim, and are required to report in person to the WorkOne Center on approximately the sixth (6th) week of their claim. They attend an Orientation to RESEA requirements and WorkOne services, then meet with a RESEA Coach for a one-on-one Assessment Interview. During this interview, staff will review recent work search efforts, claimant-centered Labor Market Information (LMI), a Self-Assessment and other information to determine the claimants Next Steps, which are listed on an Individual Reemployment Plan (IRP). Claimants are held accountable through UI Adjudication for timely completion of all agreed to activities.

Any of the RESEA Initial participants who are still collecting at the fifteenth (15th) week of their UI claim are contacted for re-engagement as part of the "Subsequent RESEA" program. These long term claimants are brought in for a one-on-one Re-Assessment Interview to determine if additional barriers to reemployment are present, and staff provides updated LMI. Subsequent claimants may be assigned additional reemployment services to help them return to work before their claim exhausts.

In 2014 and 2015, JFH was partially funded through the REA grant (with additional funding from WP and UI) as part of the elite USDOL REA study of program effectiveness. Now that the Data Collection phase of the REA study has ended, JFH is no longer part of the USDOL Reemployment Services program and is funded entirely through the State of Indiana. At this time, we are serving ALL eligible claimants in the RESEA program to provide them with the opportunity to receive additional reemployment services and more one-on-one time.

Disability Employment Efforts:

The special needs of the disabled are addressed in Indiana's WorkOne offices through programs and services. Descriptions of these programs and services are provided:

- ***Disability Employment Initiative Grant***

In October 2012, DWD received funding to implement the Disability Employment Initiative (IN-DEI) grant. The focus of the grant was to increase the education, training and employment opportunities for adults with disabilities, ages 18-64 who had a physical, development, psychiatric or other non-visible disability (specifically, individuals who had an un-redeemed Ticket to Work, Disabled Veterans or eligible spouses, and persons with disabilities who had additional barriers to education, training or employment success). Outreach efforts targeted persons with disabilities who lacked a high school diploma equivalency, were basic skills deficient, had a criminal record, were homeless and/or received TANF benefits.

IN-DEI was comprised of five pilot sites and four control/comparison sites. Pilot sites received funding to hire a full-time staff person, referred to as a Disability Resource Coordinator, to implement the grant at the local-level. IN-DEI consisted of four service delivery components: 1) Partnerships and Collaboration; 2) Integrated Resource Teams; 3) Blending/Branding/Leveraging Funding, and 4) Asset Development (financial literacy). The overarching goals during IN-DEI were as follows:

- Community outreach to consumer, employers, and organizations to promote IN-DEI.
- Social Security's Ticket to Work program; and the hiring of qualified persons with disabilities;
- Identifying beneficiaries who had an assignable Ticket;
- Assessing structural programmatic accessibility of WorkOne buildings, programs and services;
- Providing training and resources to staff (i.e., rules and regulations, sensitivity training, how to identify both visible and non-visible disabilities, etc.); and
- Providing consumers with financial literacy tools, disability resources, and employment support to assist them in finding, obtaining and retaining employment.

The grant was originally scheduled to end September 30, 2015; however, USDOL granted a six-month, no-cost extension, extending the ending date through March 31, 2016. A few significant activities occurred during IN-DEI to increase access and awareness for people with disabilities. They were as follows:

- ***Easter Seals Crossroads***
In August 2014, DWD partnered with Easter Seals Crossroad to access the accessible workstations, to identify assistive technology that should be purchased based on consumer need, as well as to survey staff to gauge training

needed to better support persons with disabilities. Easter Seals provided in-house training to staff on the workstations, developed desktop manuals for the items available at the workstations, and recorded a training video to assist with new staff/refresher training. The link provided captions and can be accessed at <https://www.youtube.com/watch?v=j8XF9jJSrc>. Information on the accessible workstations is also available at <http://www.in.gov/dwd/2968.htm>. Postcards were printed to ensure continued promotion and use of the workstations by persons with disabilities and were distributed (and will continue to be) to Vocational Rehabilitation, state and community partners, consumers, and employers. See the documentation section for a copy of the postcard.

Lastly, on March 30, 2016 DWD partnered with Easter Seals Crossroads to host a state-wide “Disability Etiquette and Sensitivity” training which provided participants with an overview of “People First Language,” simulation trainings, and hands-on exposure to various assistive technology and equipment for persons with disabilities.

- *Hamilton Center, Inc.*

On March 24, 2016 of the IN-DEI grant, DWD partnered with Hamilton Center, Inc. to host a day-long training titled, “The Successful Recipe for Disability Inclusion.” The purpose of the training was to provide supervisors, hiring managers, HR professionals, and business owners with successful strategies for employing persons with disabilities. Some of the topics presented consisted of Implementation of ADA Regulations, Disability Etiquette, Section 503, Hiring Practices, Web Accessibility, Assistive Technology and the Job Accommodations Network (JAN). Various WorkOne staff also networked with employers and provided information on Indiana Career Connect and other WorkOne programs/services.

- ***Hoosiers with Disabilities***

Job seekers with disabilities can access information on DWD’s website regarding *Employment Assistance: Reasonable Accommodations, Assistive Technology, and Disability Resources* at http://www.in.gov/dwd/WorkOne/job_seekers.html

- ***Accommodation Services***

TTY/TDDs and the 1-800 relay service are available in WorkOne offices to assist with providing communication to all customers, including individuals with disabilities.

WorkOne Partner Efforts:

Indiana’s WorkOne system also meets the needs of its major customer groups by maximizing the use of WorkOne partner resources.

- ***WorkOne Partner Resources***

DWD coordinates with Family and Social Services Administration (FSSA), the State

agency that receives federal funding to serve individuals with disabilities, and Vocational Rehabilitation Services (VRS). Examples of the coordination between DWD, FSSA, and VRS include:

- An enhanced relationship with VRS to ensure that recipient services are appropriate for people with disabilities. VRS serves amputees, persons with mental illness, the developmentally disabled persons with orthopedic, neurological, vision, and hearing impairment, and many other disabilities;
 - VRS Counselors are referring clients to WorkOne offices after case-closure to receive assistance with follow-up services;
 - FSSA oversees a bi-monthly Transition Advisory Council (DWD participates) with a focus on ensuring transition services for youth with disabilities;
 - MOU between DWD/FSSA to permit access to wage records;
 - FSSA and VRS are promoting DWD accessible workstations and referring/meeting clients at the WorkOne offices to assist with their client's job search;
 - Submission of a unified State Plan; and
 - MOU between DWD and the Division of Disabilities and Rehabilitative Services (DDARS) to collaborate the job matching efforts for people with disabilities through 2015. Employers with disability hiring initiatives posted job opportunities on ICC. ICC flagged these specific companies to streamline the job search process for individuals with disabilities. The following information was included in the MOU and made part of the application process:
 - Before asking applicants to identify themselves as having a disability, the recipient clearly informs the individual that:
 - Providing the information was voluntary; *and*
 - The information was kept confidential as provided by law; *and*
 - Refusal to provide the information would not subject the applicant employee or participant to any adverse treatment, *and*
 - The information was used solely for taking affirmative action under Section 503 of the Rehabilitation Act, *and* only in accordance with the law.
- **Mobile/Virtual WorkOne Offices**

Employ Indy, which represents Marion County, offers mobile WorkOne services. The mobile team is equipped with career advisors, computers, and workshop materials and connects individuals to all of the programs and services available through a traditional WorkOne Center.

The mobile WorkOne schedules regular stops at seven community-based organizations and many Indianapolis/Marion County Public Library branches. The mobile team also visits other organizations as needed, attends career fairs and hiring events, and can even be on-site during company downsizing to help employees make a smooth

transition from one job to the next.

Measuring Success

The services implemented by the State and LWSAs are measured at the end of each program year by comparing actual performance against the goals of the Common Measures. The state goals are negotiated between USDOL and DWD state staff at the beginning of the program year. DWD provides LWSAs the choice of accepting the state's goals as their own or coordinating with another LWSA so that the averages of the goals are the same of the state's goals. The standards for PY 2014 and PY 2015 were as follows:

Adults

- Entered Employment Rate
- Employment Retention Rate
- Average Six-Months Earnings

Dislocated Workers

- Entered Employment Rate
- Employment Retention Rate
- Average Six-Months Earnings

Youth

- Placement in Employment or Education
- Attainment of a Degree or Certificate
- Literacy and Numeracy Gains

METHODS OF ADMINISTRATION

Element 4 Documentation

E4 – A US Census Population Estimates 2013-2015

E4 – B US Census Population by Age 2015

E4 – C US Census Population by Race 2015

E4 – D DWD Policy 2015-08 - Priority of Services for Veterans and Eligible Spouses

E4 – E DWD Policy 2015-09 DVOP and LVER Roles

E4 – F 2014 Selected WIA Annual Report Articles

	Population Estimates (as of July 1)		
	2015	2014	2013
Region 1			
Lake County	487,865	490,574	491,560
LaPorte County	110,884	111,695	111,376
Porter County	167,688	167,308	166,578
Pulaski County	12,889	12,979	13,011
Newton County	14,008	14,072	14,029
Jasper County	33,470	33,464	33,412
Starke County	22,958	23,037	23,188
Total	849,762	853,129	853,154
Region 2			
Elkhart County	203,474	201,739	200,476
Fulton County	20,315	20,483	20,435
Kosciusko County	78,620	78,445	77,876
Marshall County	46,857	47,013	46,986
St. Joseph County	268,441	267,679	266,885
Region 3			
Adams County	34,980	34,756	34,671
Allen County	368,450	365,701	363,473
DeKalb County	42,589	42,508	42,387
Grant County	67,979	68,631	69,031
Huntington County	36,630	36,686	36,818
LaGrange County	38,809	38,462	38,049
Noble County	47,733	47,595	47,501
Steuben County	34,372	34,406	34,328
Wabash County	32,138	32,282	32,351
Wells County	27,964	27,827	27,733
Whitley County	33,406	33,412	33,242
Region 4			
Benton County	8,681	8,697	8,717
Cass County	37,979	38,336	38,491
Carroll County	19,856	19,904	20,101
Clinton County	32,609	32,672	32,913
Howard County	82,556	82,693	82,825
Fountain County	16,591	16,723	16,878
Miami County	35,862	35,983	36,124
Montgomery County	38,227	38,060	38,086
Tippecanoe County	185,826	183,670	181,290
Tipton County	15,267	15,429	15,588
Warren County	8,269	8,330	8,377

Bartholomew County	81,162	80,220	79,505
Dearborn County	49,455	49,423	49,755
Decatur County	26,521	26,511	26,224
Franklin County	22,872	22,898	22,920
Jackson County	44,069	43,803	43,514
Jefferson County	32,416	32,529	32,501
Jennings County	27,897	27,996	28,281
Ohio County	5,938	6,008	6,026
Ripley County	28,701	28,548	28,493
Switzerland County	10,524	10,490	10,523

Region 10

Clark County	115,371	114,301	112,771
Crawford County	10,483	10,627	10,586
Floyd County	76,778	76,233	76,098
Harrison County	39,578	39,238	39,051
Scott County	23,744	23,678	23,800
Washington County	27,827	27,904	27,814

Region 11

Dubois County	42,461	42,364	42,335
Gibson County	33,775	33,845	33,576
Knox County	37,927	37,845	38,023
Perry County	19,347	19,387	19,449
Pike County	12,594	12,641	12,660
Posey County	25,512	25,520	25,497
Spencer County	20,715	20,831	20,827
Vanderburgh County	181,877	181,918	181,521
Warrick County	61,897	61,267	61,089

Region 12

Marion County	939,020	934,531	928,515
---------------	---------	---------	---------

Indiana	6,619,680	6,597,880	6,570,518
---------	-----------	-----------	-----------

White County	24,293	24,408	24,339
--------------	--------	--------	--------

Region 5

Boone County	63,344	61,805	60,458
Hamilton County	309,697	303,278	297,097
Hancock County	72,520	71,963	71,090
Hendricks County	158,192	156,083	153,585
Johnson County	149,633	147,489	145,759
Madison County	129,723	129,999	130,401
Morgan County	69,648	69,590	69,381
Shelby County	44,478	44,531	44,455

Region 6

Blackford County	12,298	12,401	12,473
Delaware County	116,852	117,201	117,435
Fayette County	23,434	23,466	23,853
Henry County	48,985	49,072	49,051
Jay County	21,121	21,147	21,274
Randolph County	25,172	25,341	25,600
Rush County	16,672	16,834	17,001
Union County	7,182	7,225	7,284
Wayne County	67,001	67,447	67,839

Region 7

Clay County	26,503	26,483	26,735
Parke County	16,901	17,227	17,199
Putnam County	37,585	37,660	37,507
Sullivan County	20,928	21,003	21,174
Vermillion County	15,692	15,694	15,858
Vigo County	107,896	108,201	108,324

Region 8

Brown County	14,977	14,932	15,029
Daviess County	32,906	32,745	32,303
Greene County	32,441	32,733	32,798
Lawrence County	45,495	45,615	45,845
Martin County	10,226	10,209	10,223
Monroe County	144,705	143,571	142,097
Orange County	19,605	19,686	19,736
Owen County	20,872	21,034	21,175

Region 9

Population by Age: 2015						
	Preschool (0 to 4)	School Age (5 to 17)	College Age (18 to 24)	Young Adult (25 to 44)	Older Adult (45 to 64)	Older (65 plus)
Region 1						
Lake County, IN	30329	87789	43762	120941	131868	73176
La Porte County, IN	6619	17658	9508	28139	31020	17940
Porter County, IN	9199	28761	15421	42595	46730	24962
Pulaski County, IN	713	2213	1014	2891	3692	2366
Starke County, IN	1277	3961	1855	5276	5619	3070
Newton County, IN	665	2357	1088	3163	4157	2568
Jasper County, IN	3912	6202	3262	7740	8990	5364
Region 2						
Elkhart County, IN	15135	41754	18088	50839	49941	27717
Fulton County, IN	1264	3615	1559	4702	5537	3638
Kosciusko County, IN	5106	14154	7237	19133	20689	12101
Marshall County, IN	2919	8989	3926	10645	12637	7741
St. Joseph County, IN	17521	46721	29711	66643	68585	39260
Region 3						
Adams County, IN	3271	7670	3011	7754	8177	5097
Allen County, IN	26165	70002	34238	95666	92945	49434
De Kalb County, IN	2619	7892	3636	10208	11819	6415
Grant County, IN	3883	10297	9111	14237	18122	12329
Huntington County, IN	2092	5980	3690	8641	10260	5967
Lagrange County, IN	3817	9226	3402	8864	8502	4998
Noble County, IN	3017	9096	4050	11503	12950	7117
Stauben County, IN	1835	5331	3708	7459	9023	6116
Wabash County, IN	1716	5189	3280	6895	8704	6374
Wells County, IN	1787	4999	2222	6341	7738	4877
Whitley County, IN	1928	5815	2647	7896	9663	5457
Region 4						
Benton County, IN	559	1646	679	1965	2420	1412
Carroll County, IN	1003	3505	1554	4496	5694	3604
Cass County, IN	2401	6649	3190	9035	10410	6294
Clinton County, IN	2155	6311	2603	7732	8548	5260

Howard County, IN	4975	13786	6828	19159	22583	15225
Fountain County, IN	1037	2769	1296	3640	4645	3204
Miami County, IN	1831	5966	3058	9347	9886	5774
Montgomery County, IN	2343	6485	3744	8702	10463	6489
Tipton County, IN	11213	27226	44866	45983	37037	19901
Warren County, IN	673	2565	1206	3255	4526	3042
White County, IN	1504	4196	1907	5174	6838	4674
Region 5						
Boone County, IN	4109	12893	4942	15965	17351	8084
Hamilton County, IN	20947	66382	22752	84794	81064	39756
Hancock County, IN	3948	13278	5671	17815	20609	11199
Henry County, IN	9436	31226	12461	43051	41929	20289
Johnson County, IN	9500	28032	13072	39506	38405	21118
Madison County, IN	7424	21126	11259	32393	35055	22366
Morgan County, IN	3849	12412	5612	16193	20692	10890
Shelby County, IN	2587	7606	3615	10586	12996	7078
Region 6						
Blackford County, IN	768	1974	950	2651	3465	2490
Delaware County, IN	6096	16013	23395	24886	27415	18947
Fayette County, IN	1344	4058	1824	5345	6551	4412
Henry County, IN	2492	7764	4054	11800	13813	8982
Jay County, IN	1488	3994	1756	4721	5648	3513
Randolph County, IN	1470	4426	1939	5591	6901	4785
Rush County, IN	887	2924	1357	3748	4800	2956
Union County, IN	319	1253	615	1582	2143	1270
Wayne County, IN	4011	10947	5966	15493	18363	12221
Region 7						
Clay County, IN	1595	4478	2133	6408	7403	4486
Parke County, IN	1015	2625	1320	4165	4774	3002
Putnam County, IN	1842	5533	5370	8820	10163	5857
Sullivan County, IN	1105	3121	1813	5713	5695	3481
Vermillion County, IN	881	2625	1176	3559	4450	3001

	5.54%	2.21%	3.40%	1.89%	4.19%	4.90%		
Region 7								
Clay County, IN	25888	170	78	98	12	257	357	
Parke County, IN	16204	435	73	42	4	143	237	
Putnam County, IN	35090	1526	330	401	14	424	708	
Sullivan County, IN	19584	973	60	57	1	293	349	
Vermillion County, IN	15369	63	46	42	5	167	181	
Vigo County, IN	94936	7859	400	2147	50	2504	2820	
	207071	0.03644585	11026	0.017319	787	0.0295243	2787	0.019663
	3.64%	1.73%	2.95%	1.97%	86	0.0207279	3748	0.029081
						2.07%		2.91%
Region 8								
Brown County, IN	14556	95	68	55	2	201	233	
Davies County, IN	31766	417	118	244	53	308	1528	
Greene County, IN	31745	104	124	119	10	339	451	
Lawrence County, IN	44207	229	172	352	14	521	728	
Martin County, IN	10021	30	36	33	1	95	98	
Monroe County, IN	125711	5066	447	9819	90	3572	5002	
Orange County, IN	38966	288	78	77	2	246	300	
Owen County, IN	30323	117	76	102	2	252	272	
	297295	0.05232586	6196	0.009889	1119	0.0419793	10801	0.076203
	5.23%	0.98%	4.20%	7.62%	174	0.0419378	5542	0.043001
						4.19%		4.30%
Region 9								
Bartholomew County, IN	72840	1859	404	4732	64	1263	5111	
Dearborn County, IN	48171	381	112	248	27	516	596	
Decatur County, IN	25691	141	68	361	12	248	500	
Franklin County, IN	22420	83	45	136	2	186	230	
Jackson County, IN	42011	477	148	803	70	560	2822	
Jefferson County, IN	30937	672	90	252	9	456	831	
Jennings County, IN	27174	264	50	83	11	315	647	
Ohio County, IN	5810	35	12	22	1	58	67	
Ripley County, IN	27949	139	84	227	4	298	529	
Switzerland County, IN	10285	70	35	28	5	101	191	
	313288	0.05314074	4121	0.006473	1048	0.0393157	6892	0.048624
	5.51%	0.65%	3.93%	4.86%	205	0.0494025	4001	0.031044
						4.94%		3.10%
Region 10								
Clark County, IN	102093	8801	471	1227	62	2717	6098	
Crawford County, IN	10227	55	45	20	8	128	142	

Floyd County, IN	69840	4229	234	858	30	1587	2246	
Harrison County, IN	38544	761	124	168	19	462	765	
Scott County, IN	23173	105	70	147	21	228	455	
Washington County, IN	27272	137	68	93	3	254	419	
	271149	0.047724	13588	0.021343	1012	0.0379652	2513	0.01773
	4.77%	2.13%	3.80%	1.77%	143	0.0344661	5376	0.041713
						3.45%		4.17%
Region 11								
Dubois County, IN	41503	239	127	257	29	306	2961	
Gibson County, IN	32137	727	104	193	4	610	547	
Knox County, IN	35723	1218	102	380	15	489	708	
Perry County, IN	18444	569	59	90	8	177	264	
Pike County, IN	12317	84	39	37	6	111	182	
Posey County, IN	24767	258	58	129	4	296	278	
Spencer County, IN	20197	182	53	79	3	201	566	
Vanderburgh County, IN	156934	17243	510	2403	218	4569	4673	
Warrick County, IN	58379	992	187	1402	29	908	1133	
	400401	0.0704732	21512	0.03379	1239	0.0464811	4970	0.0205064
	7.65%	3.38%	4.65%	3.51%	316	0.0761629	7657	0.059489
						7.62%		5.95%
Region 12								
Marion County, IN	618251	0.10881622	262846	0.412861	4676	0.1754202	26573	0.188183
	10.88%	41.29%	17.54%	15.82	609	0.1467824	25965	0.201463
						14.68%		20.15%
State								
Indiana	5681607	636646	26656	141740	4149	128882	441909	
	5681607	636646	26656	141740	4149	128882		



To: Indiana's Workforce Investment System

From: Regina Ashley, Chief Strategy Officer *ROA*
Josh Richardson, Chief Operating Officer *JOR*

Date: May 4, 2016

Subject: DWD Policy 2015-08
Priority of Service for Veterans and Eligible Spouses in Indiana
Department of Workforce Development's Integrated WorkOne Offices

Purpose

This policy addresses Priority of Service for Veterans and Eligible Spouses under the Workforce Innovation and Opportunity Act (WIOA).

Rescission

DWD Policy 2009-01 Priority of Service for Veterans and Eligible Spouses and Required Roles and Responsibilities of Disabled Veterans' Outreach Program (DVOP) Specialists and Local Veterans' Employment Representatives (LVER) in Indiana Department of Workforce Development's Integrated WorkOne offices

References

- 38 United States Code, Chapter 42, Section 4211 and Section 4215
- Federal Register Part VIII, Department of Labor, Veterans' Employment and Training Service, 20 CFR Part 1010, Priority of Service for Covered Persons (Dec. 19, 2008)
- Jobs for Veterans Act, Public Law 107-288 (Nov. 7, 2002)
- Veterans' Program Letter (VPL) No. 07-09, "Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in Whole or in Part by the U.S. Department of Labor"
- USDOL/Employment and Training Administration (ETA) Training and Employment Guidance Letter (TEGL) No. 10-09, "Implementing Priority of Service for Veterans and Eligible Spouses in all Qualified Job Training Programs Funded in Whole or in Part by the U.S. Department of Labor"

Michael R. Pence, Governor
Steven J. Braun, Commissioner

10 N Senate Avenue
Indianapolis, IN 46204-2277
www.IN.gov/dwd

Phone: 317.232.7670
Fax: 317.233.4793

An Economic Development Partner

- Training and Employment Notice (TEN) 15-10a, "A Protocol for Implementing Priority of Service for Veterans and Eligible Spouses"

Content

Definitions

- **Covered Person**-A veteran who is eligible or the spouse of an eligible veteran who is entitled to receive priority of service as a person who has served at least one day in the active military, naval, or air service and who was discharged or released from service under any condition other than a condition classified as dishonorable. This definition includes Reserve units and National Guard units activated for Federal Service.
- **Qualified job training program** -Any workforce preparation, delivery program, or service that is directly funded, in whole or in part, by the Department of Labor and includes the following:
 - Any such programs or services that use technology to assist individuals to access workforce development programs (such as job and training opportunities, labor market information, career assessment tools, and related support services).
 - Any such program or service under the public employment system, One-stop Career Centers, the Workforce Innovation and Opportunity Act of 2015, a demonstration or other temporary program, and/or those programs implemented by States or local service providers based on Federal block grants administered by the Department of Labor.
 - Any such program that is a workforce program targeted to specific groups.
- **Veteran**- A person who served at least one day in the active military, naval, or air service and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2).
- **Active duty**- Full-time duty in the Armed Forces, other than active duty for training. This definition of "active service" does not include full-time duty performed strictly for training purposes, (i.e., that which often is referred to as "weekend" or "annual" training), nor does it include full-time active duty performed by National Guard personnel who are mobilized by State rather than Federal authorities. (State mobilizations usually occur in response to events such as natural disasters.)
- **Armed Forces**- United States Army, Navy, Marine Corps, Air Force, and Coast Guard.
- **Eligible spouse**- means the spouse of any of the following:
 - Any veteran who died of a service-connected disability;
 - Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - Missing in action;
 - Captured in line of duty by a hostile force; or
 - Forcibly detained or interned in line of duty by a foreign government or power;
 - Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
 - Any veteran who died while a disability was in existence.
 - **NOTE:** A spouse whose eligibility is derived from a living veteran or service member would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level). Similarly, for a

spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

Priority of Service

WorkOne offices are required to ensure that Priority of Service is observed. To further improve service to veterans, the Priority of Service to Veterans and Eligible Spouses Federal Regulations, effective January 19, 2009, provides specific guidance on how One-stop Career Center providers, Wagner-Peyser staff, DVOPs, and LVERs are to serve veterans with respect to priority of service.

Veteran and eligible spouse customers should be identified upon entry at a WorkOne and allowed to move to the front of the waiting line. To assist with identifying veterans and eligible spouses, Priority of Service signs have been developed and are posted in all WorkOne offices where veterans are served. Signs are framed and displayed in a manner where the public and especially veteran and eligible spouse customers can easily see them. In accordance with the priority of service sign, eligible veterans and eligible spouses should notify staff upon entry into the facility. Typically, this will be near the entry point. Customers with visual impairments must be asked if they are a veteran or eligible spouse.

Verification

- **Basic Career Services** – No source documentation needed for eligibility when these services are accessed or provided unless the individual who self-identifies as a veteran or eligible spouse:
 - Is to immediately undergo eligibility determination and be registered or enrolled in a program; and
 - The applicable federal program rules require verification of a veteran or eligible spouse status at that time.
- **Programs or Services that cannot rely on self-attestation** – verification only needs to occur at the point at which a decision is made to commit outside resources to one individual over another for these programs or services.
 - When verification of eligibility is required in these instances, a veteran or eligible spouse should be enrolled, provided immediate priority, and be permitted to follow-up subsequently with any required verification of his or her status as a veteran or eligible spouse.
- **Labor Exchange System Reporting**— Federal regulations require that all individuals who are veterans be identified as veterans in the Wagner-Peyser labor exchange system, regardless of eligibility requirements.
- **Verification of veteran status or eligible spouse**—When verification is required, the following official documents may be used:
 - A DD 214 (issued following separation from active duty);
 - An official notice issued by the Department of Veterans Affairs that establishes entitlement to a disability rating or award of compensation to a qualified dependent;
 - An official notice issued by the Department of Defense that documents the eligibility of an individual, based on the missing or detained status of that individual's active duty spouse; or
 - An official notice issued by a State veterans' service agency that documents veteran status or spousal rights, provided that the State veterans' service agency requires Federal documentation of that information.

Implementing Priority of Service

As defined in Section 2(a) of the JVA (38 U.S.C. 4215(a)), **priority of service means**, with respect to any qualified job training program, that a covered person shall be given priority over a non-covered person for the receipt of employment, training, and placement services provided under that program, notwithstanding any other provisions of the law.

Priority in the context of providing priority of service to veterans and other covered persons in qualified job training programs means the right to take precedence over non-covered persons in obtaining services. Depending on the type of service or resource being provided, taking precedence may mean:

- The covered person receives access to the service or resource earlier in time than the non-covered person; or
- If the service or resource is limited, the covered person receives access to the service or resource instead of or before the non-covered person.

Priority of service applies to every qualified job training program funded, in whole or in part, by the Department of Labor, including:

- Any such program or service that uses technology to assist individuals to access workforce development programs (such as job and training opportunities, labor market information, career assessment tools, and related support services); and
- Any such program or service under the public employment service system, One-stop Career Centers, the Workforce Innovation and Opportunity Act, a demonstration, or other temporary program; any workforce development program targeted to specific groups; and those programs implemented by States or local service providers based on Federal block grants administered by the Department.

Identifying and Informing Covered Persons

Local Workforce Development Boards must develop and include in their strategic local plan policies implementing priority of service for the local One-Stop Career Centers and for all qualified job training programs delivered through the State's workforce system. These policies must establish processes to ensure that covered persons are identified at the point of entry so that covered persons are able to take full advantage of priority of service. These processes shall ensure that covered persons are aware of:

- Their entitlement to priority of service;
- The full array of employment, training, and placement services available under priority of service; and
- Any applicable eligibility requirements for those programs and/or services.

Point of entry may include reception through a One-stop Career Center established pursuant to the Workforce Innovation and Opportunity Act, as part of an application process for a specific program, or through any other method by which covered persons express an interest in receiving services, either in-person or virtually.

Monitoring for Compliance with Priority of Service

The U. S. Department of Labor will monitor recipients of funds for qualified job training programs to ensure that covered persons are made aware of and provided priority of service. Monitoring will be performed jointly by the Veterans' Employment and Training Service (VETS) and the DOL agency

responsible for the program's administration and oversight. A recipient's failure to provide priority of service to covered persons will be handled in accordance with the program's established compliance review processes. In addition to the remedies available under the program's compliance review process, a recipient may be required to submit a corrective action plan to correct such failure.

Effective Date

Immediately.

Ending Date

Upon rescission.

Contact for Questions

policy@dwd.in.gov



To: Indiana's Workforce Investment System

From: Regina Ashley, Chief Strategy Officer
Josh Richardson, Chief Operating Officer *RAJ JOR*

Date: May 4, 2016

Subject: DWD Policy 2015-09
Required Roles and Responsibilities of Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) specialists in Indiana Department of Workforce Development's Integrated WorkOne Offices.

Purpose

To explain required roles and responsibilities for Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff in Indiana Department of Workforce Development's (DWD) integrated WorkOne offices.

Rescission

DWD Policy 2009-01 Priority of Service for Veterans and Eligible Spouses and Required Roles and Responsibilities of Disabled Veterans' Outreach Program (DVOP) Specialists and Local Veterans' Employment Representatives (LVER) in Indiana Department of Workforce Development's Integrated WorkOne offices

References

- 38 United States Code, Chapter 42, Section 4211 and Section 4215
- Federal Register Part VIII, Department of Labor, Veterans' Employment and Training Service, 20 CFR Part 1010, Priority of Service for Covered Persons (Dec. 19, 2008)
- Jobs for Veterans Act, Public Law 107-288 (Nov. 7, 2002)
- Veteran Program Letter 07-10 Refocused Roles and responsibilities of JVSG Funded Staff

Michael R. Pence, Governor
Steven J. Braun, Commissioner

10 N Senate Avenue
Indianapolis, IN 46204-2277
www.IN.gov/dwd

Phone: 317.232.7670
Fax: 317.233.4793

An Economic Development Partner

- Veteran Program Letter 03-14 Jobs for Veterans State Grants (JVSG) Program Reforms and Roles and Responsibilities of American Job (AJC) Staff Serving Veterans
- Veteran Program Letter 03-14 change 1 Expansion and Clarification of Definition of Significant Barriers to Employment for Determining Eligibility for the Disabled Veterans' Outreach Program (DVOP)
- Veteran Program Letter 03-14 Change 2 Expansion and Clarification of Homeless Definition as a Significant Barrier to Employment (SBE)
- Veteran Program Letter 04-14 Designation of Additional Population of Veterans Eligible for Services from Disabled Veterans Outreach Program Specialist – Veterans ages 18-24
- Veteran Program Letter 07-14 American Job Center (AJC) participation in Capstone Activities and other Outreach to Transitioning Service Members
- Veteran Program Letter 08-14 Designation for Additional Populations Eligible for Services from Disabled Veterans' Outreach Specialists: Transitioning Service Members in need of Intensive Services; and Wounded, Ill, or Injured Service Members Receiving Treatment at Military Treatment Facilities or Warrior Transition Units (MTFs - WTUs); and the Spouses and Family Caregivers of such Wounded, Ill, or Injured Service Members

Content

Definitions

- **Eligible Veteran**, as defined by the United States Code Title 38 Veterans' Benefits, Chapter 4211, paragraph (4), subparagraph (A) (B), is a person who:
 - served on active duty for a period of more than 180 days and was discharged or released with other than a dishonorable discharge;
 - was discharged or released from active duty because of a service-connected disability; or as a member of a reserve component under an order to active duty pursuant to section 12301(a), (d), or (g), 12302, or 12304 of title 10, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge.
- **Eligible Spouse**, as defined by the United States Code Title 38 Veterans' Benefits, Chapter 4101, means:
 - the spouse of any person who died of a service-connected disability;
 - the spouse of any member of the Armed Forces serving on active duty who, at the time of application for assistance under this chapter, is listed, pursuant to section 556 of title 37 and regulations issued thereunder, by the Secretary concerned in one or more of the following categories and has been so listed for a total of more than ninety days:
 - missing in action,
 - captured in line of duty by a hostile force, or
 - forcibly detained or interned in line of duty by a foreign government or power;
 - or
 - the spouse of any person who has a total disability permanent in nature resulting from a service-connected disability or the spouse of a veteran who died while a disability so evaluated was in existence.

- **Additional Service Populations**, as defined in The Consolidated Appropriations Act of 2014, are populations receiving support services funded by Jobs for Veteran State grants (JVSG) grants under this Act. Those populations include:
 - transitioning members of the Armed Forces who have been identified as in need of intensive services;
 - members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities or warrior transition units; and
 - the spouses or other family caregivers of such wounded, ill, or injured members.
- **Family caregiver**, with respect to an eligible veteran, means a family member who is a caregiver of the veteran.
- **Caregiver** with respect to an eligible veteran, means an individual who provides personal care services to the veteran.
- **Family member**, with respect to an eligible veteran, means an individual who—
 - Is a member of the of the veteran's family, including—
 - A parent;
 - A spouse;
 - A child;
 - A step-family member; or
 - An extended family member; or
 - lives with, but is not a member of the family of the veteran.
- **Transitioning Service Members (TSM)** according to VPL 08-14, are those members falling within the three categories below and are therefore eligible for DVOP services:
 - Service members who receive a warm handover, or who produce a DD-2958 signed by their commander documenting that they have not met Career Readiness Standards;
 - Transitioning service members ages 18-24, regardless of whether they meet Career Readiness Standards; or
 - Active duty service members being involuntarily separated through a Service reduction-in-force.

General Roles and Responsibilities of WorkOne Staff Serving Veterans

- **Welcome Team Staff** – Identify those eligible veterans or eligible spouses with significant barriers to employment (SBE) and direct those veterans to the Disabled Veterans' Outreach Program Specialist (DVOPs) for assistance for intensive services and case management. In the event that a DVOP Specialist is not available, the veteran or spouse should be referred to the appropriate Wagner-Peyser or WIOA staff in addition to scheduling or referring to an available DVOP Specialist by appointment. Under normal operating circumstances, all WorkOne customers are greeted by the welcome team and moved on to the appropriate staff for assistance.
- **Wagner-Peyser Staff**—The majority of veterans should be served by Wagner-Peyser or WIOA staff rather than the JVSG Veteran staff.
- **Veteran staff (DVOPs)**—Efforts of veteran staff should be focused on veteran customers with Significant Barriers to Employment (SBE) in accordance with Veterans Program Letter 03-14 and 03-14, Change 1 and Change 2. The six significant barriers to employment (SBE) and five other associated factors for DVOP services, as identified by the Department of Labor are:
 1. A special disabled or disabled veteran, defined in 38 U.S.C § 4211(1) and (3); Special disabled and disabled veterans are those:

- who are entitled to compensation (or who would be entitled to compensation but for the receipt of military retired pay) under laws administered by the Secretary of Veterans Affairs; or,
 - were discharged or released from active duty because of a service connected disability;
2. A Homeless person, as defined in Section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a) and (b), as amended);
 3. A recently-separated service member, as defined in 38 U.S.C § 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months, i.e. the term of unemployment over the previous 12 months remains 27 weeks; however, the requirement of 27 consecutive weeks is eliminated;
 4. An offender, as defined by WIOA Section 3 (38) 1, who is currently incarcerated or who has been released from incarceration, i.e. the expanded definition of SBE includes any eligible veteran or eligible spouse who is currently or was formerly incarcerated, removing the "within the last 12 months" requirement;
 5. Lacking a high school diploma or equivalent;
 6. Low-income individual (as defined by WIOA Section 3 (36));
 7. A Veteran between the ages of 18-24;
 8. A Veteran Affairs Vocational Rehabilitation and Employment Chapter 31 Veteran;
 9. A Transitioning Service Member in need of intensive services;
 10. Wounded, ill, or injured Service Member receiving treatment at a military facility, or Warrior Transition Unit (MTF/WTUS); or
 11. Spouses and family care-givers of such wounded, ill, or injured service members.

Disabled Veterans' Outreach Program Specialist Roles

In Veterans' Program Letter 07-10 and 03-14, DVOP specialists facilitate intensive services to veterans with barriers to employment and/or special training needs which include:

- Conducting a comprehensive assessment (minimum requirement)
- Developing an individual employment plan that is documented (minimum requirement)
- Chapter 31 Vocational Rehabilitation & Employment Case Management
- Coordinating supportive services
- One-on-One Career Counseling
- Providing short term pre-vocational services
- Group Counseling

Case Management and Tracking

The DVOP specialist is the DWD case tracker for veterans in the United States Department of Veterans Affairs Vocational Rehabilitation and Employment Program (Title 38, Code of Federal Regulations, and Chapter 31). This program requires extensive follow-up and the DVOP specialist must be allowed sufficient time to do the case management and intensive services to meet these requirements. The DVOP specialist should work closely with the LVER & WorkOne Business Service Team (BST) to ensure that veterans in Chapter 31 programs who are "job ready" receive priority in their job search, as determined by the Vocational Rehabilitation Counselor (VRC) at the VA.

In accordance with Department of Labor Veterans' Employment and Training Service (DOL-VETS) Technical Assistance Guide dated December 2008, DVOPs are required to complete a service every two weeks for the Chapter 31 Veterans that they are case managing. Typically, this service will also be recorded in the current State client tracking systems under the Chapter 31 Case Management selection.

The DVOP specialist is the resident expert on programs available to assist SBE veterans in improving their skills so they can take the next step up in their careers. This would include workshops the DVOP may present and other staff services available at the WorkOne office as well as the programs available through the Veterans' Administration, such as Vocational Rehabilitation and Employment Program Services (VOC REHAB) and other WIOA training programs. The DVOP specialist is required to do outreach to target all veterans. DVOPs will coordinate outreach activities with their formal and functional managers to ensure maximum efficiency of the event.

In the event that a DVOP specialist does not have a full case-load of eligible veterans and eligible spouses, the DVOP specialist may perform additional outreach activities. For example, at such locations:

- Vocational Rehabilitation & Employment (VR&E) Services
- Homeless Veterans Reintegration Program (HVRP)
- VA Medical and other Centers
- Veterans' Administration Community Based Outpatient Clinic (CBOC)
- Homeless shelters
- Civic and service organizations
- Community Stand Downs
- Military installations
- WIOA partners
- State Vocational Rehabilitation Services
- County Service Veterans Service Officer

Case Noting

Case notes for veterans in the Chapter 31 program are confidential and must be kept separate from other case management files. Specific veterans' disability data may not be recorded in any computer system. The only data that can be recorded is the percentage of disability rated by the US Department of Veterans Affairs.

Rapid Response for Dislocated Veterans

At a minimum, the DVOP should be a part of the Rapid Response Team at selected Rapid Response events for dislocated veterans, ensuring that SBE veterans are offered JVSG services.

Local Veterans' Employment Representative (LVER) Roles

In Veterans' Program Letter 07-10 and 03-14, the following are the mandated functions for the Local Veterans' Employment Representative Staff:

1. As an integral part of the State's Labor Exchange System, LVER staff work with employers to promote veterans as job seekers who have highly marketable skills and experience.
2. LVER staff advocate for veterans to gain employment and training opportunities with business, industry, and community-based organizations. To accomplish this, LVER staff participates in a variety of outreach activities including, but not limited to:
 - a. Planning and participation in job fairs.
 - b. Coordinating with unions, apprenticeship programs, and business organizations to promote employment and training opportunities for veterans.
 - c. Promoting credentialing and training opportunities for veterans with training providers and licensing agencies.
3. LVER staff establishes, facilitates, and/or maintains regular contact with employers to include federal contractors. They should coordinate with employer relations representatives as part of the WorkOne system to include veterans in their marketing efforts.

4. LVER staff provides and facilitates a full range of employment, training, and placement services to meet the needs of priority veterans in targeted categories identified and approved in the State Plan. These services may include, but are not limited to:
 - Conducting job search assistance workshops in conjunction with employers
 - Providing job development opportunities

The LVER should be integrated into the WorkOne Employment Team or Business Services Team (or equivalents). The difference between the LVER and any other member of the team is that the LVER advocates for veterans for employment and training opportunities with businesses, industries, unions, and apprenticeship programs. They may ask employers specifically to seek veterans for positions in their companies. Optimally, the employer would target specific positions for veterans with certain skills (based on the veterans' military training/military occupational specialty). Under no circumstances will the LVER provide related services to non-veteran customers unless the customer is an eligible spouse covered by priority of service.

The LVER staff must be able to inform the community of Veteran services. LVER staff should be encouraged to attend meetings of the local Chamber of Commerce, area Unions, and Hiring Events to promote all the WorkOne services; both as a networking tool and for the opportunity to speak about veterans' programs.

Joint Responsibilities of DVOPs and LVERs

Outreach Accountability

In order to maintain accountability for time spent on outreach, each LVER and DVOP shall report the results of their outreach activities, including but not limited to travel logs in writing via e-mail or Outlook Calendar Shares to their WorkOne local management staff. If necessary, copies of these documents and schedules will be provided to formal State Managers, and/or functional managers when applicable. These reports will be used by the LVER staff, Regional Operators, and the Workforce Development Boards (WDB's), to produce the required quarterly reports for the State Veterans Coordinator and U.S. Department of Labor Veterans' Employment and Training Services as required in Public Law 107-288 and VPL 01-15. Outreach activities will be reviewed by supervisors and those that are determined by the management team to be unproductive may be discontinued.

National Veterans Training Institute (NVTI)

All DVOPs and LVERs are required to attend veteran related courses at NVTI within 18 months of assignment or hire. Typically, most veteran representatives will attend at least two courses offered by NVTI. In some instances, the DWD State Veterans Coordinator may elect to send veterans' representatives to additional courses based on career development.

Indiana Seamless Transition Program

In some instances, LVERs and DVOPs will be called upon to assist with the State of Indiana Seamless Transition Program for State Guard and Reservists returning from deployment. This may include the Yellow Ribbon Program for returning deployed service members.

Negotiated Performance Measures

The State of Indiana Veterans Program negotiates Performance Targets with the USDOL/VETS for the JVSG programs which uses ETA 9002/200 reports to report outcomes. The following entities are charged with the responsibility of meeting the VETS Negotiated Performance Targets: Indiana Department of Workforce Development, the State's regional Workforce Development Boards (WDBs), the State Workforce Innovation Council (the State's Workforce Investment Board), Regional Workforce

Board Chairs, and Regional Operators. Indiana's Veterans' Performance Targets are typically negotiated annually with the U.S. Department of Labor's Veterans Employment and Training Service.

Effective Date

Immediately.

Ending Date

Upon rescission.

Contact for Questions

policy@dwd.in.gov

JOBS FOR AMERICA'S GRADUATES

Jobs for America's Graduates (JAG)-Indiana is a statewide drop-out prevention program that targets at-risk high school juniors and seniors, and out-of school youth who have dropped out of high school. The program's goals are as follows:



1. Provide basic skills assessment and remediation to ensure program participants receive a high school diploma or its equivalent;
2. Assist in the attainment of employability skills needed to find a job and/or pursue postsecondary education. Students are taught 37 core competencies (skills) to assure a strong attachment to the labor market; and
3. Help to ensure graduates are placed in full-time employment, transition to post-secondary education or training or enlist in the military.

Indiana's JAG model provides tutoring assistance and adult mentoring. Participants receive individualized attention and identification of specific barriers to success, which include academic problems, deficient life and personal skills, and social or economic barriers.

Each high school senior completes the Free Application for Federal Student Aid (FAFSA), applies to two colleges and has the opportunity to take the American College Testing (ACT), Scholastic Aptitude Test (SAT) or other postsecondary enrollment examination. Last year, 43% of the students in follow-up were enrolled in post- secondary education. The 2015 high school graduates earned \$15M in scholarships. JAG Indiana was recognized by the national organization for having the highest amount of earned scholarships by its students.

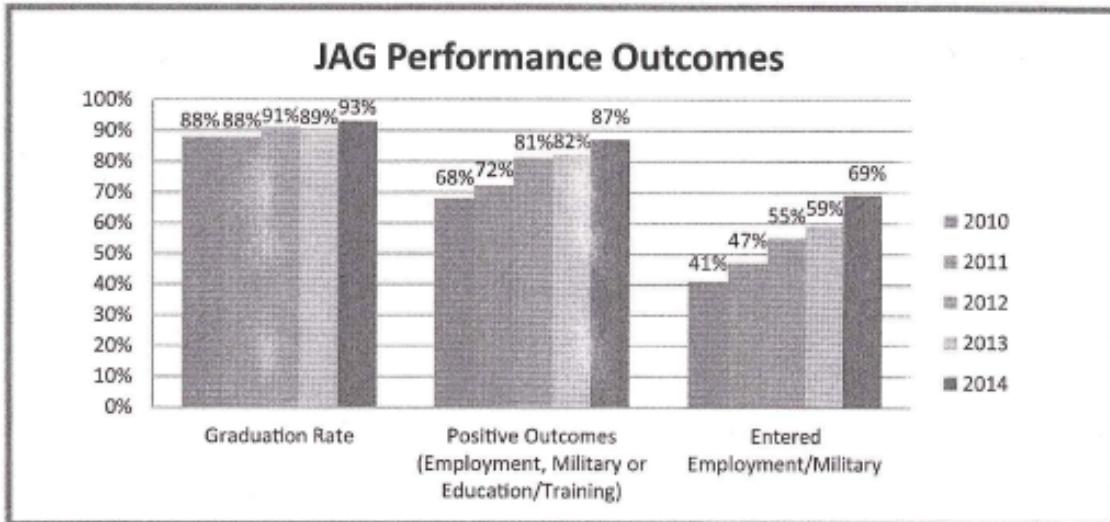
In addition to class work, students participate in a highly motivated student-led JAG Career Association at their high schools that promotes community involvement, civic and social awareness and leadership. Through their Career Association, students are invited to participate in a statewide event sponsored by DWD, the Career Development Conference.

The State Career Development Conference was held March 13, 2015 at Ivy Tech Community College in Indianapolis. The event provided students the opportunity to visit the campus and compete in employability skills events. Twelve regional conferences were held prior to the statewide conference. Ninety-two schools participated in the regional conferences with the top 150 students attending the State conference. The State Career Development Conference featured competitive events designed to demonstrate employability skills learned through program competencies, employer and community connections. Thirty-six students received awards ranging from \$250 to \$3,000.



JOB'S FOR AMERICA'S GRADUATES (CONT'D)

During the 2013 session of the Indiana General Assembly, state funds were allocated for the first time for JAG. This enabled the program to essentially double in size. Programs were sustained with additional state funds from the General Assembly in 2015.



Since its inception in 2006, JAG has served more than 13,000 Hoosier students. Over 5,200 students participated in JAG at 118 programs throughout the State during the 2014-2015 school year.

HOOSIER INITIATIVE FOR RE-ENTRY (HIRE)

The HIRE program is an initiative to help ex-offenders become gainfully reemployed and reenter society. In conjunction with the Department of Correction (DOC), DWD leads program participants through the process of becoming successful job candidates by working with employers to determine the knowledge, skills, abilities, and aptitude needed to be a successful employee within their organization.

Participants are often chosen based on two main requirements: they must have displayed a positive track record during incarceration and must be identified as low or medium risk to re-offend. The staff works with DOC to determine which applicants would best suit a specific employer. Once applicants are screened, DWD delivers a curriculum focused on soft skills, workplace aptitude, and motivation. Upon release participants receive additional targeted job training if needed.

After release and job placement, DWD staff meets regularly with participants and employers to identify work related issues or needs, and to discuss any program changes.

It costs Indiana \$20,000 per year to incarcerate one offender. Department figures show the state's cash return to the economy during the past year is more than \$8M due to savings on incarceration costs and increases in state economic productivity.

MIGRANT AND SEASONAL FARMWORKERS

As a part of the Department of Workforce Development's (DWD) commitment to serve migrant and seasonal farm workers seeking work and skill enhancements, the following job-related information and assistance was provided:

- Job search, job referral and placement, referral to training and skill building activities;
- During the harvest season, 2,500 flyers were distributed; and
- Worked to coordinate outreach services and funds for emergency services to farm workers via contract renewal with Proteus®, Inc.
- Work continues toward renewing MOU with Indiana State Department of Health to provide pre-occupancy housing inspections for H-2A workers.

RAPID RESPONSE

DWD provides services and resources that are brought to dislocated workers on-site at a downsizing company prior to a mass layoff event. These customized services are part of a program called Rapid Response, which is designed to meet the needs of dislocated workers. The goal is to get the dislocated worker back to work as soon as possible and minimize the disruptions in their life a layoff can cause. A Rapid Response event is initiated when the State learns of impending layoffs or closures. Many companies will contact the Rapid Response team to notify them of a layoff and invite them to come on-site to help the workers.

During PY14, 108 notices of closures or layoffs were received. The WorkOne centers working in conjunction with Regional Workforce Investment Boards provided services that included rapid response orientations, community coordination of resources, job preparedness workshops, career planning, resume development, interview coaching, skill evaluations, training, computer classes, and job service assistance.

DWD has an online tool for rapid response that is being utilized at all WorkOne centers. It is designed to assist dislocated workers in understanding the transferability of their knowledge, skills, and abilities when seeking employment opportunities. All WorkOne offices have been fully trained and are utilizing the tool with their dislocated workers. The tool creates a personal development plan for the dislocated worker that can be accessed from any computer with internet access. This tool has also been utilized on site with the employer to assist these workers facing job losses. It is designed to transition workers to their next employment as soon as possible. In addition to providing services on site and as the WorkOne offices, the tool also assists labor market analysts, career counselors, and others with analyzing, understanding, and exploring skills associated with each occupation measured and published by the Occupational Information Network (O*NET) sponsored by the U.S. Department of Labor's Employment and Training Administration. This new tool now is going through its next generation which will provide mobile online applications for smart phones.

REEMPLOYMENT ELIGIBILITY & ASSESSMENT (REA) AND JOBS FOR HOOSIERS (JFH)

DWD's goal for the 2014 program year was to provide some level of Reemployment Services to nearly every qualified Unemployment Insurance (UI) recipient. Indiana was one of seven states selected to participate in an elite USDOL REA study, administered by Abt Associates. This study was designed to compare the "Full REA" program of more intensive services with mandatory follow up and additional assignments to the Jobs for Hoosiers (JFH) state REA program, which was the "Partial REA" program in the study.

The Jobs for Hoosiers program is an initiative that began October 1, 2013. It is a program that works in tandem with REA and requires individuals receiving unemployment benefits to report to a local WorkOne after their fourth week. The program introduces unemployed Hoosiers to WorkOne services and training opportunities during a one day orientation and provides access to additional reemployment services, if desired.

The Full REA goal in 2014 was 25,000, and JFH was 20,300. The Full REA program surpassed its PY14 goal by serving 29,480 claimants, and the JFH program served 30,069 UI recipients. This was an approximate 58% increase in customers served at some level of Reemployment Services.

FEDERAL BONDING PROGRAM

The Federal Bonding program has proven to be a valuable tool in removing barriers to reemployment. Examples of employment barriers include poor credit history, criminal background, disadvantaged youth, dislocated homemaker, or history of substance abuse. Indiana's Federal Bonding program has established key partnerships both inside and outside the WorkOne system. In PY14, 66 bonds, valued at \$5,000 each, were issued for a total of \$330,000, which allowed 31 jobseekers with serious barriers to return to meaningful work, which was not possible without bond approval.

VETERANS PROGRAM

In Indiana, there are approximately 258,000 Veterans in the workforce. DWD has 66.5 funded veteran staff positions divided between Disabled Veteran Outreach Program Specialists (DVOPs) and Local Veterans Employment Representatives (LVERs) to serve Veterans throughout the state. During PY14, DWD provided statewide services to more than 8,933 Hoosier Veterans through operations at full-service WorkOne Centers, and the Regional Veterans Administration Office in Indianapolis.

SEAMLESS TRANSITION PROGRAM

During PY14, DWD continued its agreement with the USDOL to provide employment, unemployment, reemployment, and training services to National Guard soldiers returning from deployment and demobilizing at Camp Atterbury. In partnership with the Indiana Department of Veterans Affairs (IDVA), The Indiana National Guard Transition Assistance Advisors, and DWD; the state continues to work with the Indiana National Guard Yellow Ribbon Seamless Transition Program throughout the state. Under this program, DVOPs provided the following services:

- Assistance in filling out veteran's transition forms for demobilizing soldiers;
- Dissemination of forms to veteran's state employment and training offices;
- Informational services in regards to soldier's rights; and
- Enrollment and job search assistance.

In addition, DVOPs provide continuous support services through the Indiana National Guard Yellow Ribbon Seamless Program, including support services for the Indiana Air National Guard units in Fort Wayne and Terre Haute. Additionally, DWD has partnered with the IDVA for Community Outreach Events throughout the State. These events are designed for Veterans to connect with various and organizations.

VOCATIONAL REHABILITATION AND EMPLOYMENT (VR&E) SERVICES (CHAPTER 31):

Chapter 31 is a unique program designed specifically for disabled Veterans and has two primary goals: first, the program assists service-disabled Veterans to prepare for, obtain, and maintain suitable employment. Secondly, for those Veterans who are severely disabled and for whom gainful employment is not an option, assistance may be provided to allow these veterans to live more independently in his or her community. During PY14, 172 Veterans participated in this program. Under this program, DVOPs provide case-management services to Veterans entering the employment phase of the rehabilitation process.

OPERATION HIRE A HOOSIER VETERAN

DWD and several Workforce Investment Boards supported Operation Hire a Hoosier Veteran's career fair on April 15, 2015, which was attended by several hundred Hoosier Veterans. In preparation for the career fair, two regional workshops were conducted at various locations throughout the central Indiana area. The workshops included presentations on resume preparation, professional work attire, and interviewing skills. The concept of veteran-focused workshops, plus the cooperation and coordination among Workforce Service Areas (WSA) and Society for Human Resource Management (SHRM), proved to be a success and will become a standard procedure prior to other Hoosier Veteran Career Fairs. Approximately 120 vendors, which included various employers and area post-secondary institutions, participated in the event. There were a total of 49 job offers that were made at the event and we had approximately 670 Veterans and Service members check in/attend the 2015 event.

GOLD CARD INITIATIVE

The Gold Card provides unemployed post-9/11 era Veterans with the intensive and follow-up services they need to succeed in today's job market. The Gold Card initiative is a joint effort of the Department of Labor's Employment and Training Administration (ETA) and the Veterans' Employment and Training Service (VETS). DWD provide over 2,000 Veterans Gold Card services in PY14.

The Gold Card program is consistent with all Veterans Services by providing Priority of Service as outlined in DOL/VETS guidance. Gold Card Veterans are made aware of the intensive services made available. The Post 9/11 Veterans are then provided the services listed below are closely monitored once employment is obtained for retention and to insure a satisfactory outcome.

The enhanced in-person services available for Gold Card holders at local WorkOne offices may include:

- Job readiness assessment, including interviews and testing;
- Development of an Individual Development Plan (IDP);
- Career guidance through group or individual counseling that helps Veterans in making training and career decisions;
- Provision of labor market, occupational, and skills transferability information that inform educational, training, and occupational decisions;
- Referral to job banks, job portals, and job openings;
- Referral to employers and registered apprenticeship sponsors;
- Referral to training by WIA-funded or third party service providers; and
- Monthly follow-up by an assigned case manager for up to six months.

DOL/VETS VETERAN PROGRAM LETTER 03-14, CH. 1 & 04-14

Veteran Program Letter 03-14 was introduced to refocus the roles and responsibilities of JVSG Staff (DVOPs and LVERs). This letter introduces six significant barriers that DVOP specialists use for eligibility criteria to see Veterans and eligible persons:

1. A special disabled or disabled veteran, as those terms are defined in 38 U.S.C. 4211(1) and (3); Special disabled and disabled veterans are those:
 - Who are entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans' Affairs; or,
 - Were discharged or released from active duty because of service-connected disability;
2. Homeless, as defined in Section 103(a) of the Stewart. B. McKinney Homeless Assistance Act (42 U.S.C. 11302(a))
3. A recently-separated service member, as defined in 38 U.S.C. 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;
4. An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;
5. Lacking a high school diploma or equivalent certificate; or
6. Low income (as defined by WIA at Sec. 101(25) (B)).

VPL 03-14 was also complemented by VPL 04-14 that added an additional target of Veterans age 18-24, to be serviced by DVOPs.

Additionally, LVERs are now refocused to conduct employer outreach and job searches/ workshops, planning and participation in hiring events, and coordinating with Federal Contractors, Unions, apprenticeship programs and business organizations to promote and secure veteran employment and training programs.

BUSINESS SERVICES

DWD has a long standing commitment to engaging the state's employers and working to meet the needs of this important workforce development partner. In PY14, WorkOne business services delivery personnel have averaged over 250 on-site business visits per month, hosted more than 100 employment fairs per month and posted more than 5000 jobs per month on Indiana Career Connect to help promote employment across the state.

Through their leadership, the WorkOne business services teams in each of Indiana's 12 regions have been able to focus their efforts to drive more business engagement, through quality delivery of services, more frequent interaction, and higher repeat customers. The Business Services team also includes the functional leadership of the Local Veteran's Employment Specialists (LVERs) and 12 specially funded Reentry Employment Coordinators.

DWD engages several key partners from around the state to enhance the reach and effectiveness of Business Services. Some, but not all, of the key partners are listed below:

- Regional Workforce Investment Board Directors
- Regional Business Services Representatives
- Local and State Political Leaders
- Workforce development leaders
- Veterans representatives
- Key leaders in the Indiana business community including representatives from manufacturing, medical services, logistics and other key industries within the state
- Indiana Economic Development Corporation
- Local and Regional Economic Development Professionals
- The Indiana Chamber of Commerce
- The Indiana Manufacturing Association

ON-THE-JOB TRAINING (OJT)

OJT is an occupational skills training program. Individuals earn wages while learning new occupational skills. Employers are reimbursed for costs associated with training new employees. During PY14, 671 Indiana participants were enrolled in OJT. The number of OJT participants for PY14 is listed below by region:

OJT PY14	
Region	Count
1	52
2	54
3	153
4	53
5	49
6	11
7	4
8	5
9	6
10	5
11	77
12	66
TOTAL	535

Mainly WIA Adult, Dislocated Worker, and Youth dollars were used to fund OJTs. Collectively, 414 OJTs were funded by WIA Adult, 48 by WIA Dislocated Workers, and 3 by WIA Youth. Other funding sources such as Rapid Response and Trade Act were also used to finance OJTs. The types of occupations that participants were trained in varied greatly, including Quality Control Systems Manager, Shipping & Receiving Clerk, Electronic Repairer, Team Assembler, and Plastic Machine Tool Operator.

TRADE ADJUSTMENT ASSISTANCE (TAA)

In PY14, Indiana had 13 authorized TAA petitions. Approximately 1,500 workers were eligible for employment services, supportive services and training consideration. During PY14, 1,349 individuals participated in TAA. 619 new training participants were added PY14; while 716 participants exited training during the same period. 72.81% of training participants successfully completed their individualized training programs.

It should be noted that during PY14, TAA was operating under the more restrictive 2014 Reversion Benefits Law (2014R). This meant that the second 6 months of PY14, only the manufacturing sector (not service sector as under 2011 Law) was potentially eligible for TAA. Workers also had to be separated from their employer (instead of just being under 'threat of layoff' as under 2011 Law). This accounts for the lower number of new training participants in PY14.

TAA was renewed under the Trade Adjustment Assistance Renewal Act of 2015 (TAARA 2015) on June 29, 2015. The program was renewed through June 30, 2021 under the 2015 law. The 2015 benefit law is very similar to the 2011 benefits law, with some minor differences. All clients who were eligible under 2014R benefit law have been transitioned to the 2015 law as of September 28, 2015. All required notifications are being sent to current and potential TAA clients.

While economic conditions have generally improved, the expanded pool of potential TAA participants is expected to increase in PY 2016. This is due to the broader eligibility requirements of the 2015 benefit law, which includes both the Manufacturing and Service Sectors. Another factor for the expected increase is that workers certified under a TAARA 2015 law petition by the United States Department of Labor (USDOL), only have to meet the "threat of layoff" eligibility threshold. An increase in TAA petitions filed and certified has been seen in the second half of PY15 and the beginning of PY16 as a result of the Dislocated Worker Unit's (DWU) strategic initiative to proactively aid companies, unions and workers file TAA petitions. This trend is expected to continue. Regional assistance in implementing this initiative has been invaluable.

TAA participants may also be co-enrolled in Workforce Investment Act funded programs based on their need for services not allowed under TAA.

USDOL/TAA COMMON MEASURES PY14 - INDIANA	
Entered Employment Rate	75.84%
Employment Retention Rate	91.91%
6-month average earnings	\$19,011.99

WORKFORCE DEVELOPMENT GRANTS

NATIONAL EMERGENCY GRANT

Beginning July 1, 2013, Indiana was awarded an approximate \$2 million National Emergency Grant (NEG) from the United States Department of Labor. The Indiana Dislocated Worker Training (DWT) NEG award was utilized to provide education and training in in-demand occupations to Hoosiers who are experiencing long-term unemployment, have been profiled as likely to exhaust benefits and have barriers to employment.

ELEMENT 5

COMPLIANCE WITH SECTION 504 OF THE REHABILITATION ACT OF 1973, AS
AMENDED, AND 29 CFR PART 38



INDIANA
WORKFORCE
DEVELOPMENT
AND ITS **WorkOne** CENTERS

ELEMENT 5: Compliance with Section 504 of the Rehabilitation Act of 1973, as Amended

[29 CFR Part 38.7 through 38.9 and Subparts B and C of 29 CFR Part 32]

Indiana's objective is to provide equitable services to persons with disabilities and to ensure that all WorkOne offices are compliant with the Rehabilitation Act of 1973, Section 504, as well as the Americans with Disabilities Act of 1990 (ADA), as amended. Applicable requirements are communicated through DWD Policy 2007-30 entitled, "Ensuring Nondiscrimination and Equal Opportunity Access to Individuals with Disabilities participating in Indiana's Workforce Investment System."

Disability Employment Initiative Grant

In October 2012, Indiana implemented the Indiana Disability Employment Initiative (IN-DEI) grant, which focused on increasing the educational, training and employment opportunities for adults with disabilities, ages 18-64 who were unemployed, underemployed, and/or receiving Social Security benefits (SSI/SSDI). IN-DEI served adult Hoosiers with disabilities, be it physical, developmental, psychiatric, or other non-visible disabilities, in particular, persons who had an un-redeemed Ticket to Work voucher, disabled veterans or eligible spouses, and persons with disabilities who had additional barriers in education, training or employment success. Outreach efforts targeted persons with disabilities who lacked a high school equivalency, were basic skills deficient, had a criminal record, were homeless, and/or received TANF benefits.

The grant was originally scheduled to end September 30, 2015; however, USDOL granted a six-month, no-cost extension through March 31, 2016. A few significant activities occurred during this extension of IN-DEI to increase access and awareness for people with disabilities. Please see Element 4 for descriptions of these activities that increased access and awareness.

Architectural Accessibility and Collaboration with Partners

In 2010, DWD collaborated with the Indiana Protection and Advocacy Services (IPAS) to conduct ADA Self-Evaluation Surveys. DWD and IPAS selected twenty WorkOne offices to conduct an ADA survey. Of the twenty sites, ten were full-service and ten were express. The purpose of the survey was to identify any accessibility problems with the existing sites to ensure that each WorkOne office was meeting the requirements under ADA, as well as plan how to make existing sites more accessible for people with disabilities.

The advocates from IPAS used various tools to complete the survey. These items consisted of a tape measure, a device for measuring inclines, and a plunger specifically designed to measure

the force required to open a door. The checklist used was the “American with Disabilities Act Checklist for Readily Achievable Barrier Removal.” Some of the various items surveyed for compliance were the WorkOne parking lots, restrooms, conference/class rooms, and the entrance accessibility.

The Local EO Officers attended their respective region’s survey in conjunction with the assigned IPAS advocate and Disability Program Navigator (DPN). The State EO Officer attended twelve of the twenty surveys across the State of Indiana.

After the completion of the surveys, the Local EO Officers developed an accessibility report which summarized the results of their ADA survey. Each report included items that were found to be noncompliant and explained the plans to make modifications and bring their WorkOne office up-to-code. The accessibility reports for the twenty WorkOne offices were submitted to the State EO Officer and serve as a reference for follow-up to ensure the necessary modifications were completed.

In 2012, the IPAS advocates conducted follow-up ADA visits at selected WorkOne offices within Regions 4, 6, 7, and 8 to identify corrective measures that were taken after the 2010 ADA surveys. Follow-up visits were also conducted in 2013 at WorkOne offices within Regions 1, 2, 4, 7, and 9. The lead advocate provided a summary report to the State EO Officer listing the findings. The State and Local EO Officers continue to monitor WorkOne offices to ensure on-going compliance.

Programmatic Accessibility

DWD’s ROC Division staff and the State and Local EO Officers conduct monitoring for the twelve regions. Desk and on-site reviews are conducted each year to ensure recipients are complying with the nondiscrimination and equal opportunity provisions of Section 188 and 29 CFR Part 38. The reviews generate reports to identify compliance issues, areas where onsite monitoring needs to be conducted, or areas where training needs to be provided.⁹ When needed, corrective action is required to resolve any issues. In some instances, follow-up reviews occur to confirm corrective actions have been implemented.

ROC Division staff conduct Programmatic Monitoring to ensure grantees’ adherence to the State of Indiana DWD and federal DOL policies and regulations. This monitoring ensures that mandatory documentation is contained within physical files as well as online in the state’s case management system (TrackOne).

⁹ Element 7’s documentation section includes a copy of the monitoring instrument as well as a list of the requested preliminary data.

As part of the review process, DWD ROC Division staff complete a “File Review Sheet” and verify that each of the files contains a Grievance Policy and EO Policy signed by the client or, when required, a guardian. The guidelines for these policies are found in the following DWD Policies¹⁰:

- 2012-04 entitled, “Nondiscrimination and Equal Opportunity Requirements of WIA;”
- 2012-05 entitled, “WIA Equal Opportunity Policy;” and
- 2007-10 entitled, “Grievance/Complaint Procedures Policy.”

The DWD ROC Division reviews the required EO and nondiscrimination language contained within each LWSA’s grant agreements, contracts, Memoranda of Understanding (MOU), and other applicable documents.

Job Qualifications

In order to ensure that job qualifications do not use qualification standards that screen out an individual with a disability on the basis of that disability, DWD requires its Recipients to have a schedule for the review of all job qualifications. Recipients must also review employment and employment-related training selection criteria for compliance, with the exception of those criteria shown to be necessary for the training.¹¹ Assigned WorkOne staff review job postings on ICC to ensure postings do not contain discriminatory language or language that would screen out an individual with a disability on the basis of the disability.

Indiana Career Connect (ICC)

The Division of Disabilities and Rehabilitative Services (DDRS) and DWD entered into a MOU to better streamline job matching efforts for individuals with disabilities through 2015. Employers with disability hiring initiatives posted job opportunities on ICC and utilized the search engine to identify qualified individuals. Complete information on this initiative can be found in Element 4.

Pre-employment Medical Exams or Inquiries

Recipients may not conduct pre-employment medical examinations or question an applicant for employment or training as to whether the applicant has a disability or the severity of the disability. However, Recipients may make a pre-employment inquiry of an applicant’s ability to perform job-related functions.¹²

Confidentiality of Information

Medical condition information is kept in a secured location and kept apart from other files.

¹⁰ Policies listed are in process of revision for WIOA.

¹¹ DWD Policy 2007-30.

¹² 29 CFR 32.15 and DWD Policy 2007-30.

Participant Integration

Recipients must administer programs and activities in the most integrated setting appropriate, and possible, for qualified individuals with disabilities. Pursuant to DWD Policy, individuals with disabilities may not be segregated or provided with separate aid, benefits, services, or training as a result of their disability.¹³

Communication

- Vocational Rehabilitation Services (VRS) and all Workforce Development Boards (WDBs) have established MOU to list VRS as a mandatory WorkOne partner.
- Enhancement of services to persons with disabilities continues in those locations where VRS are housed in the same buildings with WorkOne offices. Indiana has a State referral system between programs such as VRS, rehabilitation facilities, and educational institutions. These various organizations provide services to persons with disabilities and network with community, regional, and national organizations to ensure that this group of citizens is considered for potential employment or training as appropriate.
- WorkOne offices contain print, visual, and audio materials in multiple mediums to include Zoom Text software, large key caps, and other accommodations for individuals with disabilities. Additionally, some WorkOne offices have a full accessibility workstation. These workstations may include a larger computer screen, Braille keyboards, and keyboards with large text letters. WorkOne partners have included assurances in their MOUs to ensure that accessibility and reasonable accommodations for individuals with disabilities will be met. Periodic EO Monitoring occurs to ensure compliance with this requirement. A full listing of locations and items is provided in the documentation section.
- TTD/TTY's and 1-800 relay services are available in local offices to help ensure communication to all customers, including individuals with disabilities.
- The IDOA established a new contract for Interpreter Services in December 2014 for Indiana's workforce development system. Please see Element 2 for complete information.

¹³ DWD Policy 2007-30.

METHODS OF ADMINISTRATION

Element 5 Documentation

E5 – A 2013 ADA Compliance Survey Findings (sample page)

DEI Grant		
Accessibility Findings during April 2013 surveys (update as of January 2015)		
Region 2		
WorkOne Office	Corrective Measure	Completed (Y//N) – if no, provide update
St. Joseph	Curb cut at front entrance needs to be level with the parking lot, repair uneven paving	Center manager working with landlord to correct the issue
	Secure doormats	In Progress
	Interior doors not operable with a closed fist	In Progress
	Rearrange furniture and fixtures to clear aisles in workshop classroom (for 36" pathway)	In progress, center manager working with workshop staff
	Exterior door closers, closes in 1 second	Will adjust exterior door closer timing
	No signs at inaccessible restrooms that direct to accessible ones	In Progress
	Stall door is not operable with a closed fist	In progress – may replace inaccessible knobs with levers or loop handles
	Water fountain protrudes >4" into circulation space	In progress – may add planter or other cane detectable item on both sides of fountain at floor level
Elkhart	Entrance not slip-resistant	In progress – center manger working with landlord to add non-slip
	Room signage too high and does not meet accessibility requirements	In progress – will remove non-essential signage and ensure all remaining signage is correct
	Short one accessible parking space	In Progress – may work with landlord to add on space on South Side of building
	No van accessible parking	In Progress – may work with landlord to reconfigure spots to accommodate van spot, merge spaces 1 & 2, and repaint lines
	Accessible parking not marked	In Progress, will add signage
	Stall door is not operable with a closed fist	In progress – may replace inaccessible knobs with levers or loop handles
	No grab bars in ladies room	In Progress – addition of grab bars behind and on the side wall
	Mirror >43" in men's and women's restroom	Mirror currently at top of vanity counter, difficulty in moving down the requisite 3"
	Water fountain protrudes >4" into circulation space	N – resolution unknown at this time

ELEMENT 6

DATA AND INFORMATION COLLECTION AND MAINTENANCE



INDIANA
WORKFORCE
DEVELOPMENT
AND ITS **WorkOne** CENTERS

ELEMENT 6: Data and Information Collection and Maintenance

[29 CFR Part 38.37 through 38.41 and 38.54(d)(1)(iv) and (vi)]

Recipients must collect and maintain records on applicants, registrants, eligible applicants/registrants, participants, those terminated, employees, and applicants for employment to determine whether the nondiscrimination and equal opportunity provisions of WIOA are being met.

DWD Policy 2012-04 communicates the following information that Recipients must record: race/ethnicity, sex, age, and where known, disability status of the specified groups. The records must be stored in a manner that ensures confidentiality and used only for purposes of recordkeeping and reporting, determining eligibility for WIOA Title I-funded programs or activities or other uses authorized by law.

SYSTEM

Indiana Career Connect (ICC): Indiana's job-matching system may be accessed online or at terminals in WorkOne offices. The web-based system is utilized by both employers and job seekers. Employers may post job openings and find candidates. Job seekers can register for work, find job openings, and use other services, such as resume drafting, available on the website. DWD anticipates the launch of a new demand-driven workforce system (DDWS) in the fall of 2016 that will provide job-matching, case management, and data collection services.

TrackOne: Indiana's case management system, TrackOne, collects and reports data for the programs administered by DWD. TrackOne receives data from ICC and collects data for applicants and participants receiving core, career and supportive services under WIOA Title I. These case management services will be incorporated into the DDWS.

The State EO Officer is able to retrieve and cross-reference Job Service and UI data and demographic information from TrackOne. DWD's Field Systems Unit provides state and regional WIOA, Job Service, and UI data to the State EO Officer on an annual basis for review.

Uplink: Uplink, Indiana's portal for filing Unemployment Insurance (UI) claims, is accessible online and in WorkOne offices.

RESOURCES

Hoosiers by the Numbers: Demographic information is collected at Hoosiers by the Numbers, which provides a demographic breakdown by workforce service area and counties and is located at <http://www.hoosierdata.in.gov>.

RECORDS

Retention: Certain participant records, particularly those containing medical information, are secured and kept separate from other information to ensure confidentiality. All participant data collected is retained for a period of three years from the date of application, and for complaints, three years after resolution of the complaint.

Logs: Each Region uses the “Customer Service Record (State Form 46001 (R3/4-16))” to log complaints filed that allege discrimination on the basis of race, color, religion, sex, national origin, age, disability, political affiliation, belief, citizenship and/or participation in a WIOA Title I-financially assisted program or activity.

The Local EO Officers submit the “Customer Service Record” on a quarterly basis (April 5, July 5, October 5 and January 5) to the State EO Officer. The log is accessible online at [State Form 46001 \(R3/4-16\)](#).

ENFORCEMENT

WIOA grant applicants and recipients must notify the State EO Officer of any administrative enforcement actions or lawsuits filed regarding discrimination. Additionally, the Director of CRC will be notified of any administrative enforcement actions and lawsuits brought against them that allege discrimination on one or more of the bases prohibited by WIOA Section 188.

JOB ORDERS

In addition to analyzing data for disparities, the State EO Officer reviews job orders for language that may have a disparate impact on members of a protected class.

Exclusions: USDOL released Training and Employment Guidance Letter (TEGL) No. 31-11, which provides information about exclusions based on criminal records as they apply to the public workforce system and other entities that receive federal financial assistance to operate job banks, and how such restrictions may have a disparate impact on members of a particular race or national origin, in violation of federal antidiscrimination laws. The TEGl contains three notices that, depending upon the circumstances, are provided to employers:

- **Notice #1:** An employer that submits a job announcement containing restrictions or exclusions based on arrest or conviction history will have an opportunity to edit or remove the announcement, to help ensure that the employer and the public workforce system are in compliance with the law.
- **Notice #2:** If language is identified in the posting that excludes individuals based on arrest and/or conviction history, the employer should take this opportunity to remove or edit the posting as needed to ensure that the employer and the public workforce system are in compliance with the law. If the employer wishes to post the

announcement as is, the announcement will be posted along with information about the civil rights laws that may apply to such restrictions.

- **Notice #3:** If an employer's criminal record exclusion policy or practice has a disparate impact on Title VII-protected individuals, it must be job related and consistent with business necessity.

JOB POSTINGS

The State EO Officer periodically reviews job orders from the "Widget," which lists three new jobs daily from ICC. The three jobs provide a range of education requirements, such as a high school diploma or equivalent, associate's degree, bachelor's degree, or a master's degree. The State EO Officer reviews the postings to identify language that includes exclusions based on criminal records and disabilities. The Widget is located on DWD's website at <http://www.in.gov/dwd>.

METHODS OF ADMINISTRATION

Element 6 Documentation

E6 – A TrackOne Paper Client Application

E6 – B PY15 State and Region Desk Review Data

E6 – C 2015 Race and Ethnicity Hoosier by the Number Data (State and Marion County)

E6 – D 2015 Age Hoosier by the Number Data (State and Marion County)

E6 – E SF #46001 (R3/4-16) Complaint Log

**CLIENT APPLICATION**

State Form 55301 (R2 / 6-15)

INDIANA DEPARTMENT OF WORKFORCE DEVELOPMENT

This Agency is requesting disclosure of your Social Security Number under federal regulations at 20 CFR 603.3 in order to assist you in obtaining employment and training services. Disclosure of this information is mandatory. Failure to provide any information may prevent this form from being processed. This information is needed to make eligibility determination under 29 U.S.C. 2864(d). All financial information that you provide shall remain confidential according to IC 4-1-6-2. Disability status information is requested for purpose of record keeping and determining your eligibility for programs. Your refusal to provide the information will not result in adverse treatment. The information obtained will be maintained confidentially.

Date of Application (mm/dd/yy):

Date of Program Participation (mm/dd/yy):

Organization:

Basic Client Information

Name:

Address:

ZIP Code:

City:

State:

County:

Telephone:

Email Address:

Birth Date (mm/dd/yy):

Age:

Gender:

Additional Client Information

Social Security Number:

Citizenship:

Citizenship Documented by:

Hispanic/Latino Ethnicity:

Did Not Self-Identify Ethnicity:

American Indian/Alaskan Native:

Asian:

Black/African American:

Hawaiian/Pacific Islander:

White/Caucasian:

Did Not Self-Identify Race:

Selective Service Registration (Males born after December 31, 1959):

Selective Service Number:

Veteran Status

Veteran <= 180 days active US Military Service:

Veteran >180 days active US Military Service:

Disabled Veteran:

Other Eligible Person:

Title 10 Activated:

Transitioning Service Member (TSM):

Not a Veteran:

Other Characteristics

Disabled:

Poor Work History:

Locally Defined Barrier:

Local Barrier Description:

Basic Skills Deficient Language Score:

Basic Skills Deficient Math Score:

Basic Skills Deficient Reading Score:

Limited English:

Substance Abuse:

Offender:

Pregnant Youth:

Parenting Youth:

Youth-Needs Assistance:

Homeless Youth:

High School Dropout:

English Language Learner:

Subject to Juvenile or Adult Justice System:

Reviewer Information

Interviewer:

Interview Date (mm/dd/yy):

Reviewer:

Review Date (mm/dd/yy):

I certify that all information is true and correct to the best of my knowledge and I authorize the verification of the information I have provided. I understand that my Social Security Number will be used only by programs to provide optimum employment and training assistance, to identify and verify my records in the Workforce development System and Welfare department, and for statistical program evaluation and reporting. I also understand that since I am applying for employment and training assistance services for which I might receive taxable income, I must, under law, provide my Social Security Number for purposes of Federal Income tax and Social Security Tax deductions. I understand I could be terminated from the program if I am found ineligible after enrollment. I understand I may be prosecuted for providing false information. My rights and responsibilities as an applicant or participant have been presented to me.

APPLICANT SIGNATURE _____ DATE SIGNED (mm/dd/yy) _____

OTHER SIGNATURE IF REQUIRED – (a) Obtain the signature of a parent or legal guardian if the applicant is under eighteen (18) (unless married or head of a household); or, (b) if the applicant is using the income of a parent, legal guardian, or other family member who provided fifty-one (51) or more percent of the applicant's support during the eligibility determination period, that person must sign the application. Date the receipt of the other signature. When "other signature" is required, identify his/her relationship to applicant.

SIGNATURE _____ DATE SIGNED (mm/dd/yy) _____ RELATIONSHIP _____

Employment Information – Status at Participation

Current Employment Status:
Unemployment Insurance Compensation Status:
Number of Weeks Unemployed within Past Twenty-Six (26) Weeks:
Employment Service Status:
Incumbent Worker:

Dislocated Worker/Trade Adjustment Assistance

Employer at Dislocation:
Job Title:
Job Start Date (mm/dd/yy):
Job End Date (mm/dd/yy):
Hourly Wage:
Hours Worked per Week:
Dislocated Worker Category:
If Dislocated, Describe the Circumstances:

Laid off from TAA Certified Employer:
Employer Location:
TAA Petition Number:
State Identifier:

Farm Worker or Migrant Food Processor

Farming Last Twelve (12) Months:

Family/Income

Family Status:
Number in Family:
Responsible for Dependent Child < Eighteen (18):
Family Income for Previous Six (6) Months (includable income):
Homeless:
Township Trustee Assistance:
SNAP/Food Stamps:
TANF:
General Assistance:
Refugee Cash Assistance:
Free or Reduced Lunch:
Social Security Disability Insurance (SSDI):
SSI Title XVI:
Low Income:
Recently Released Felon (within last twelve (12) months):
Active Vocational Rehabilitation Plan:

Education Information

School Status at Participation:
Highest Grade Completed:
Age sixteen (16) to seventeen (17) Not Attending School within the Most Recent School Calendar Quarter:

Program Application/Enrollment

AVAILABILITY OF FUNDS & GRIEVANCE PROCEDURES

I understand and agree to the following program limitations and have discussed them with a WorkOne staff person. Enrollment into programs available through a WorkOne office, which administer the Workforce Innovation and Opportunity Act (WIOA). The WorkOne office does not guarantee employment and/or training to participants. Any change in funding or program emphasis may necessitate changes in participant activities. WorkOne administrative staff will have absolute discretion in the utilization of available funds. This agreement pertains to all participants in all programs in this service delivery area.

Grievance Procedures As an applicant for, or participant in, the Workforce Innovation and Opportunity Act programs(s), you have a right to file a grievance if you feel there has been a violation of the implementation of the Act(s), the regulations, the grant, or any other agreements under the Act(s); if you feel you have been discriminated against because of age, disability, sex, race, color, religion, nation origin, or political affiliation, or belief, or if you feel there has been fraud, criminal abuse, or other criminal activity. If you would like to discuss a complaint, please contact the WorkOne Center in the county in which the incident occurred. If your complaint is not resolved to your satisfaction within three working days; you will be referred to a Grievance Officer. The Grievance Officer will assist you with the subsequent steps of the process. A complete copy of the Grievance Procedure is available if you desire to have it. By signing below, you acknowledge your right to file a grievance has been explained, a summary of the procedures have been given to you, and a complete copy of the process has been made available to you.

THE EQUAL OPPORTUNITY LAW & GRIEVANCE PROCEDURES

It is against the law for this recipient of Federal financial assistance to discriminate on the following basis: against any individual in the United States, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief; and against any beneficiary of programs financially assisted under the Workforce Innovation and Opportunity Act (WIOA), on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his/her participation in any WIOA financially assisted program or activity. The recipient must not discriminate in any of the following areas: deciding who will be admitted, or have access, to any WIOA financially assisted program or activity; providing opportunities in, or treating any person with regard to, such a program or activity; or making employment decisions in the administration of, or in connection with such a program or activity.

Grievance Procedures

If you think you have been subjected to discrimination under a WIOA financially assisted program or activity, you may file a complaint within 180 days from the alleged violation with either: The WorkOne Center Equal Opportunity Officer; or the Director, Civil Rights Center (CRC), U.S. Department of Labor, 200 Constitutional Ave. NW, Rm. 4123, Washington, DC 20210. If you file a complaint with the recipient, you must wait until the recipient issues a written Notice of Final Action, or until 90 days are passed (whichever is sooner), before filing with the Civil Rights Center (CRC). If the recipient does not give you a written Notice of Final Action within 90 days of your complaint, you do not have to wait for the recipient to issue that Notice before filing a complaint with the CRC. However, you must file your CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the date on which you filed your complaint with the recipient). If the recipient does give you a written Notice of Final Action on your complaint, but you are dissatisfied with the decision or resolution you may file a complaint with CRC. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action.

RELEASE OF INFORMATION AUTHORIZATION & CONSENT FOR RELEASE OF INFORMATION

Release of Information Authorization

I, the undersigned, do hereby authorize any and all persons, firms, and entities of any kind or character to release to the WorkOne Center upon presentation of this authorization, any and all information that such persons, firm or entity may have with regards to me, including, but not limited to, copies of personal files, past history, or present status. This information may be divulged to the WorkOne Center upon written request that accompanies a signed copy of this authorization. Any person, firm, or entity, governmental or otherwise, releasing information hereunder is hereby released from any and all liability of any kind or character because of such release to WorkOne. The WorkOne Center will keep any such record in the strictest of confidence and only for purposes for which WorkOne has been formed.

Consent for Release of Information

I, the undersigned, do hereby authorize WorkOne to release any information from my personal files to any agency or individual for the purpose of expediting the service that WorkOne will procure for me. I understand that I have the right to review any and all such personal information or other information pertaining to me up on written request. I further understand that this information is to be used to determine eligibility, for verification, statistical analysis, and for reporting data as required by federal law, and to aid in procurement of services for me. I hereby release and discharge WorkOne of any liability of any kind or character with respect to the release of information herein authorized. The records so released will be in the strictest confidence and be used only for those purposes for which WorkOne was formed.

EMPLOYMENT ELIGIBILITY VERIFICATION (I-9 form)

I, the undersigned, attest, under penalty of perjury, the documents that I have presented as evidence of identity and employment eligibility are genuine and relate to me. I am aware that federal law provides for imprisonment and/or fine for any false statements or use of false documents in connection with this certificate.

MY SIGNATURE CERTIFIES THAT I HAVE READ AND UNDERSTAND ALL INFORMATION ON THIS FORM

SIGNATURE OF APPLICANT _____ DATE SIGNED (mm/dd/yy) _____

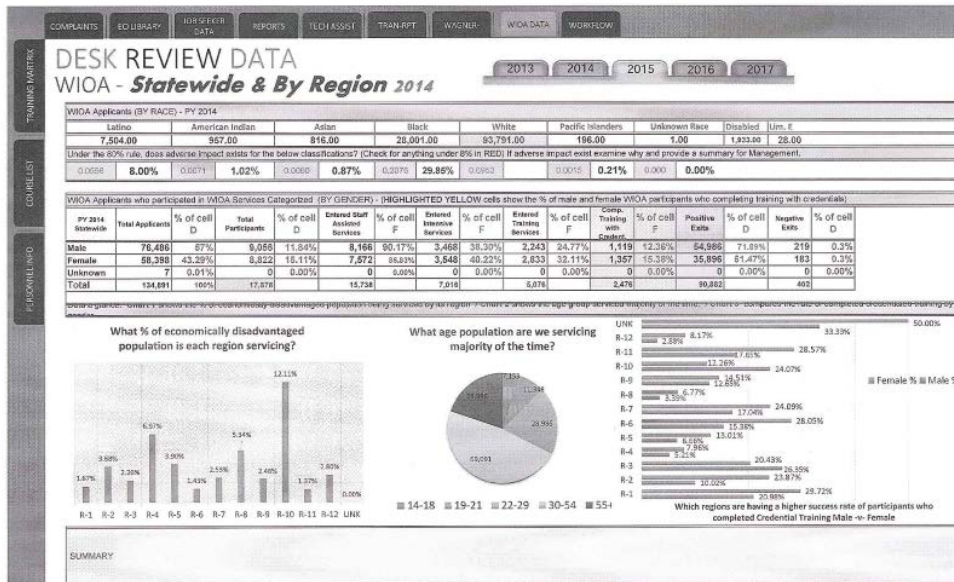
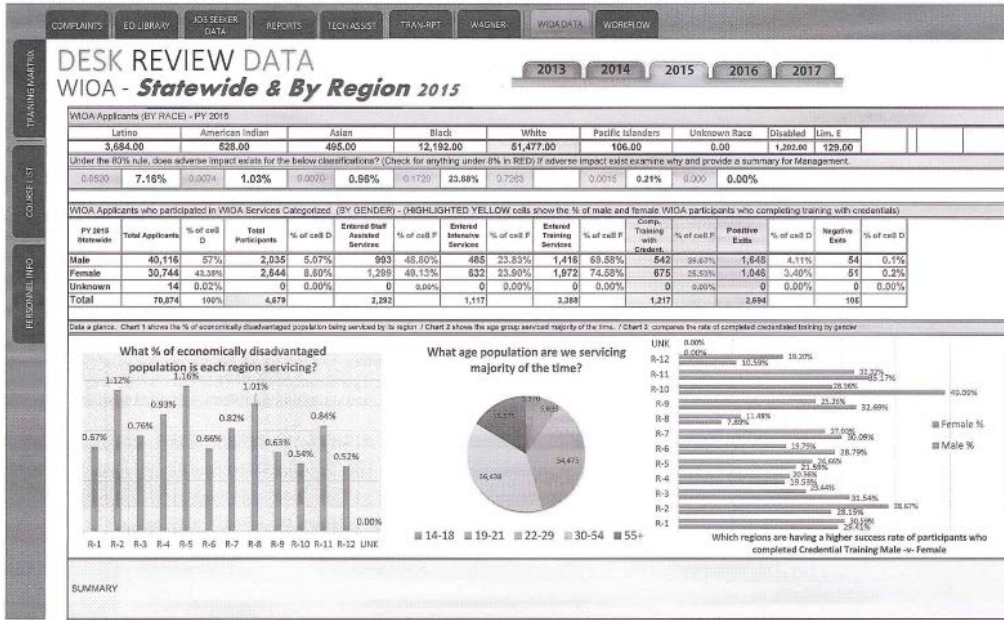
SIGNATURE OF PARENT/GUARDIAN (IF APPLICABLE) _____ DATE SIGNED (mm/dd/yy) _____ SIGNATURE OF WORKONE STAFF _____

STAFF SIGNATURE CERTIFIES THAT DOCUMENTS HAVE BEEN EXAMINED

CERTIFICATION: I attest, under penalty of perjury, that I have examined the documents presented by the above individual, that they appear to be genuine and to relate to the individual named, and that the individual, to the best of my knowledge, is eligible to work in the United States.

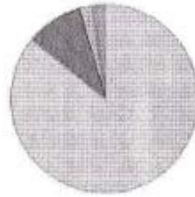
SIGNATURE _____ NAME (PRINT OR TYPE) _____ TITLE _____

EMPLOYER NAME _____ ADDRESS _____ DATE (mm/dd/yy) _____



IDWD Research and Analysis

Population by Race in 2015



5,681,607	White
636,646	Black
141,740	Asian
26,656	Am Ind
4,149	Haw./Pacific Isl
128,882	2 or more

	Total	Percent Change From 2000	Percent Distribution
Indiana in 2015			
All Races	6,619,680	8.7%	100.0%
White	5,681,607	4.5%	85.8%
Black	636,646	22.8%	9.6%
Asian	141,740	129.6%	2.1%
American Indian/Alaska Native	26,656	58.2%	0.4%
Hawaiian and Other Pacific Islander	4,149	73.6%	0.1%
Two or more races	128,882	126.9%	1.9%
Hispanic or Latino	441,909	103.3%	6.7%
Not Hispanic or Latino	6,177,771	5.2%	93.3%

Source: [U.S. Census Bureau](#)

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



HOOSIERS BY THE NUMBERS

Your source for workforce data from the [Indiana Department of Workforce Development](#)

Race and Ethnicity

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

This output provides population numbers for the various race groups and Hispanic ethnicity. Hispanic is considered an ethnicity and not a race; thus, someone can be a white Hispanic, a black Hispanic, etc.

Source: [U.S. Census Bureau](#) decennial population counts and annual population estimates

Frequently Asked Questions

- ***How is race defined?***

The U.S. Census Bureau complies with the Office of Management and Budget's standards for maintaining, collecting, and presenting data on race. These guidelines generally reflect a social definition of race recognized in this country. They do not conform to any biological, anthropological, or genetic criteria.

- ***Can data users compare data by race from Census 2000 and subsequent estimates with previous census data?***

Data on race from Census 2000 are not directly comparable with those from the 1990 census and previous censuses due, in large part, to giving respondents the option to report more than one race. Other factors, such as reversing the order of the questions on race and Hispanic origin and changing question wording and format, also may affect comparability.

- ***Why didn't the Census Bureau allow respondents to report more than one race in previous censuses?***

The decision to use the instruction "mark one or more races" was reached by the Office of Management and Budget in 1997 after noting evidence the increase in children from interracial unions and the need to measure the increased diversity in the United States.

- ***What are the race groups that federal agencies are to use to comply with the Office of Management and Budget's guidance for civil rights monitoring and enforcement?***

The categories (made available in OMB Bulletin No. 00-02, "Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Monitoring and Enforcement") to be used are:

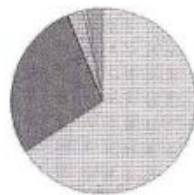
- American Indian and Alaska Native

- Asian
- Black or African American
- Native Hawaiian and Other Pacific Islander
- White
- American Indian and Alaska Native and White
- Asian and White
- Black or African American and White
- American Indian and Alaska Native and Black or African American
- Greater than 1 percent: Fill in if applicable with multiracial combinations greater than 1 percent of the population
- Balance of individuals reporting more than one race

This website is powered by [STATS Indiana](#) and the [Indiana Department of Workforce Development](#).

IDWD Research and Analysis

Population by Race in 2015



618,251	White
262,846	Black
26,673	Asian
4,676	Am Ind
609	Haw./Pacific Isl
25,965	2 or more

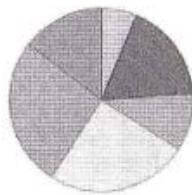
	Total	Percent Change From 2000	Percent Distribution
Marion Co, IN in 2015			
All Races	939,020	9.1%	100.0%
White	618,251	-0.8%	65.8%
Black	262,846	24.8%	28.0%
Asian	26,673	107.6%	2.8%
American Indian/Alaska Native	4,676	91.6%	0.5%
Hawaiian and Other Pacific Islander	609	36.2%	0.1%
Two or more races	25,965	130.3%	2.8%
Hispanic or Latino	93,434	173.3%	10.0%
Not Hispanic or Latino	845,586	2.3%	90.0%

Source: [U.S. Census Bureau](#)

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

IDWD Research and Analysis

Population by Age Group in 2015



419,490	0-4
1,159,966	5-17
665,744	18-24
1,673,615	25-44
1,734,738	45-64
966,127	65 plus

	Number	Change from Previous Year	Percent Change
Indiana			
Total	6,619,680	21,800	0.3%
0 to 4	419,490	-181	-0.0%
5 to 17	1,159,966	-2,723	-0.2%
18 to 24	665,744	-4,201	-0.6%
25 to 44	1,673,615	1,707	0.1%
45 to 64	1,734,738	1,739	0.1%
65 plus	966,127	25,459	2.7%
Indiana			
Total	6,619,680	21,800	0.3%
0 to 4	419,490	-181	-0.0%
5 to 17	1,159,966	-2,723	-0.2%
18 to 24	665,744	-4,201	-0.6%
25 to 44	1,673,615	1,707	0.1%
45 to 64	1,734,738	1,739	0.1%
65 plus	966,127	25,459	2.7%
United States			
Total	321,418,820	2,511,419	0.8%
0 to 4	19,907,281	35,271	0.2%

5 to 17	53,737,830	10,659	0.0%
18 to 24	31,219,892	-264,065	-0.8%
25 to 44	84,726,985	645,402	0.8%
45 to 64	84,065,980	525,030	0.6%
65 plus	47,760,852	1,559,122	3.4%

Source: [U.S. Census Bureau](#)



COMPLAINT LOG
 State Form 46001 (R3 / 4-16)
 INDIANA DEPARTMENT OF WORKFORCE DEVELOPMENT

OFFICE: _____		Date Filed	Related To				Refer To	Pending			Resolved Enter Date			Disposition	
NAME OF CONTACT PERSON: _____			Job Services - Migrant Season Farm Workers	Job Services - Non Migrant Season Farm Workers	WIOA Title 1 Training	Discrimination (Enter number from below)	Other Agency Complaint	Name of Referral Agency (e.g., ETCO, OSIV, etc.)	Local Level	State Level	Referral Agency Level	Local Level	State Level		Agency Level
QUARTER ENDING: _____															

Enter Number in Discrimination Column (if applicable)

- 1. Race, 2. Color, 3. Religion, 4. Sex, 5. National Origin, 6. Age, 7. Disability, 8. Political Affiliation or Belief, 9. Citizenship, 10. Participation in WIOA Title 1

ELEMENT 7

MONITOR RECIPIENTS FOR COMPLIANCE



INDIANA
WORKFORCE
DEVELOPMENT
AND ITS **WorkOne** CENTERS

ELEMENT 7: Monitor Recipients for Compliance [29 CFR Part 38.54(d)(2)(ii)]

DWD is in process of revising procedures for the periodic monitoring of programs and activities operated under WIOA Title I. Current procedures mirror those established under WIA and can be found within DWD Policy 2012-04 entitled, “Nondiscrimination and Equal Opportunity Requirements of WIA.” The purpose of the policy is to communicate the nondiscrimination and equal opportunity requirements to entities receiving WIOA funding.

The coordinated efforts of the State and Local EO Officers and the DWD Regulatory Oversight and Compliance (ROC) Monitoring Unit ensure monitoring and compliance of the Workforce Service Areas.

Monitoring

Each of the twelve regions are reviewed for compliance with the nondiscrimination and EO requirements of Section 188 of WIOA and 29 CFR Part 38 through a combination of data analysis, desk review, and onsite monitoring. If the analysis of data reveals disparities in services rendered, the State and/or Local EO Officer will conduct a follow-up investigation to determine if the differences are due to discrimination. This will be done through a variety of techniques such as interviews and records review.¹⁴

Monitoring is based on:

- The review and analysis of data output reports from the TrackOne System and the Hoosiers by the Numbers Research and Analysis website;
- Complaint records;
- Reports from DWD Oversight Program Monitors or other interested parties; or
- Demographics and geography.

Data Analysis

DWD’s Field System provides State and regional data to the State EO Officer on an annual basis. The data represents Adults, Dislocated Workers and Youth, and provides a breakout of the following categories:

- Applicants;
- Eligible Applicants;
- Participants;
- Positive and Negative exits;
- Information/Self Core Services

¹⁴ Documentation section includes selected pages from previous monitoring guides, monitoring schedules, guides/tools, announcement letters, reports, etc.

- Career Services;
- Enrolled in Training (Actual Start Date); and
- Completed Training.

When data is received, the State EO Officer will use the 80-20 percent rule outlined by CRC to identify disparities. If disparities are located, the State EO Officer will conduct a follow-up investigation to determine if the differences are due to discrimination. This will be done through a variety of techniques, such as interviews and records review.¹⁵

Desk Review

Each of the twelve regions receive yearly desk reviews, which consist of completing a monitoring tool and submitting preliminary data. The State EO Officer and/or Local EO Officers review the information to identify areas that require training or regions that need to receive on-site monitoring for further investigation. The monitoring instrument is modeled after the nine elements of the WIOA MOA:

- Element 1: Designation of Equal Opportunity Officer (29 CFR Parts 38.23-38.28);
- Element 2: Notice and Communication (29 CFR Parts 38.29 – 38.36);
- Element 3: Assurances, Contracts, Job Training Plans, Policies and Procedures (29 CFR Parts 38.20 – 38.22);
- Element 4: Universal Access (29 CFR Part 42);
- Element 5: Compliance with Section 504 Disability Requirements (29 CFR Part 38.37);
- Element 6: Data and Information Collection and Maintenance (29 CFR Parts 38.38 – 38.41);
- Element 7: Monitoring Recipients for Compliance (29 CFR Part 38.54(d)(2)(ii));
- Element 8: Complaint Processing Procedures (29 CFR Parts 38.70 – 38.79); and
- Element 9: Corrective Actions and Sanctions (29 CFR Part 38.54(d)(2)(vii).

On-site Reviews

The State and Local EO Officers will conduct periodic onsite reviews to ensure that the equal opportunity and non-discrimination provisions of Section 188 and 29 CFR Part 38 are met. On-site structural accessibility, parking for individuals with disabilities, designated restrooms, appropriate signage, program accessibility and effective communication with persons with disabilities are some of the elements monitored. Onsite reviews will also consist of interviews and records review. WIOA training regarding monitoring is planned within the next year.

DWD Oversight Monitors include elements of the EO review in their annual onsite monitoring. These elements include the following:

- A review of EO policies;
- EO Notice requirements;

¹⁵ A sample of the data and the 80-20 percent calculation is included in the documentation section.

- Complaint procedures;
- A review of contracts, training agreements, and Memoranda of Understanding for required verbiage.

Findings

A post-review report is issued by the State or Local EO Officer to the recipient within thirty days of the exit conference. This report recognizes positive performance and practices where they exist, sets forth issues that must be resolved, describes findings of noncompliance in a concise and specific manner, and states specific corrective action to be required, including deadlines for completion.

Corrective actions those activities undertaken by the recipient in response to EO deficiencies discovered by the EO Officer. EO deficiencies can be placed in two different categories. Technical difficulties are deficiencies that do not involve discrimination and the others are deficiencies involving discrimination. DWD Policy 2002-34 entitled, "Sanctions Policy" provides guidance to the workforce investment system regarding implementation of sanctions.

METHODS OF ADMINISTRATION

Element 7 Documentation

E7 – A SF #45153 (R3/6-16) - Record of Complaint Information

E7 – B PY14 Announcement of Monitoring Visit

E7 – C PY14 Sections of the Program Monitoring Guide

E7 – D PY14 Fiscal Monitoring Guide

E7 – E PY14 Monitoring Schedule

E7 – F PY14 Internal Control Matrix

E7 – G PY14 Sample Monitoring Report

E7 – H Risk Assessment Tool

E7 – I PY15 Sample Announcement of Monitoring Visit

E7 – J PY15 Sections of the Program Monitoring Guide

E7 – K PY15 Fiscal Monitoring Guide

E7 – L PY15 Monitoring Schedule

E7 – M PY15 Internal Control Matrix

E7 – N PY15 Sample Monitoring Report



RECORD OF COMPLAINT INFORMATION

State Form 45153 (R3/6-16)

INDIANA DEPARTMENT OF WORKFORCE DEVELOPMENT

This agency is requesting disclosure of your Social Security Number in accordance with IC 4-1-8-1; disclosure is mandatory and this record will not be processed without it. CONFIDENTIAL RECORD PURSUANT TO IC 22-4-19-6, IC 4-1-6

NOTICE: You have the right to file a complaint of discrimination ~~either~~ directly with this office or with the Director, Civil Rights Center (CRC) U.S. Department of Labor, 200 Constitution Avenue, N.W., Room N-4123, Washington, D.C. 20210

PART I COMPLAINANTS INFORMATION	INFORMATION ON WHO THE COMPLAINT IS AGAINST
1. SOCIAL SECURITY NUMBER	5. NAME OF PERSON COMPLAINT MADE AGAINST
2. NAME	6. BUSINESS NAME
3. ADDRESS (number and street, city, state, and ZIP code)	ADDRESS (number and street, city, state, and ZIP code)
4. TELEPHONE NUMBER	7. TELEPHONE NUMBER
8. DESCRIPTION OF COMPLAINT (if additional space is needed, use reverse side and make an X in the box in lower right hand corner of this section.)	
TYPE OF COMPLAINT	
<p><u>Discrimination Complaint</u></p> <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> Age <input type="checkbox"/> Religion <input type="checkbox"/> Sex <input type="checkbox"/> National Origin <input type="checkbox"/> Disability <input type="checkbox"/> Political Affiliation/Belief <input type="checkbox"/> Citizenship <input type="checkbox"/> Participation in WIOA 1	<p><u>Program Complaint</u></p> <input type="checkbox"/> Job Service <input type="checkbox"/> non-MSFW <input type="checkbox"/> MFSW <input type="checkbox"/> non-Job Service Related <input type="checkbox"/> non-MSFW <input type="checkbox"/> MFSW <input type="checkbox"/> WIOA Training Programs <input type="checkbox"/> Unemployment Insurance <input type="checkbox"/> Other (Explain) _____
<p><u>Referral of Complaint</u></p> <input type="checkbox"/> Agency (Name) _____	
Certification	
<p>I certify that the information furnished is true and accurately stated to the best of my knowledge. I authorize the disclosure of this information to enforcement agencies for the proper investigation of my complaint. I understand that my identity will be confidential to the maximum extent possible, consistent with applicable law and a fair determination of my complaint.</p>	
Signature of Complainant _____	Date Signed (month, day, year) _____
PART II FOR OFFICE USE ONLY	
1. PRINTED NAME AND TITLE OF PERSON RECEIVING COMPLAINT	SIGNATURE
2. OFFICE ADDRESS (number and street, city, state, and ZIP code)	TELEPHONE NUMBER
DATE / /	
3. DISPOSITION	
Action Taken _____	



INDIANA
WORKFORCE
 DEVELOPMENT
 AND ITS **WorkOne** CENTERS

PY'14

TO: Region X WIB Chair Region X WIB Staff

FROM: Thomas Brown
 DWD Grant Oversight Supervisor
 Department of Workforce Development
TWBrown@dwd.in.gov

DATE:

SUBJECT: Announcement of Monitoring Visit

Please read this memo in its entirety, as some significant changes have been made from previous information requests.

Department of Workforce Development (DWD) Oversight Division staff will arrive to conduct monitoring of your WorkOne Integrated System as shown below:

Date:
Time:
Duration: Not more than five (5) days
Exit: Method and time will be determined during the monitoring visit
Requested Items Due:

Please be aware of the following:

- Please provide the name and contact information for the person in your organization who will serve as the coordinator for this monitoring visit to me, Thomas Brown, at TWBrown@dwd.in.gov upon receipt of this memo;
- Please submit all items electronically (i.e., e-mail, flash drive, or disc). Any requests for an exception must be submitted to DWD Oversight upon receipt of this letter;
- The monitoring period for this visit is the current program year which began July 1, 2014, but may be extended, as necessary. It also includes any Data Validation conducted in the current program year. Client files selected for review will include only clients active during the current program year, but the entirety of the file will be reviewed;
- Monitoring of fiscal services provided by Crowe-Horvath will be conducted at their Indianapolis offices. Those visits will be coordinated with Carla Crowe of Crowe-Horvath;
- A listing of participant files to be monitored will not be sent in advance, and the files selected will not be disclosed unless further documentation—beyond TrackOne—is required. Any

Michael R. Pence, Governor
 Steven J. Braun, Commissioner

10 N Senate Avenue
 Indianapolis, IN 46204-2277
www.IN.gov/dwd

Phone: 317.232.7670
 Fax: 317.233.4793

An Economic Development Partner

Documents
Listing of all procurements of over \$100K made during the monitoring period. Please indicate which of the following procurement methods was followed: <ul style="list-style-type: none"> ◆ Non-competitive Proposal/Sole Source transactions; ◆ Sealed Bid/Invitation for Bid transactions; or, ◆ Competitive Proposal/Request for Proposal transaction
Listing of all equipment purchases of over \$5K made during the monitoring period
Monitoring policies, instruments and schedule
Amounts and funding sources for any bonus awarded since July 1, 2013, and the criteria used to determine the awarding and the amount of the bonus
Meeting agendas and minutes from WIB meetings and Youth Council meetings for the prior twelve (12) months (including any executive sessions)
A listing of OJT clients and contracts active during PY 2013 and 2014
A listing of all service providers (including the WIA category being served and contact information for each provider)
Copy of current inventory listing
Worksheet used for last inventory
A listing of any pre-paid program items
Copies of AER's and the associated trial balance
Bank reconciliations performed for the monitoring period
Most recent payroll run and the supporting timesheets
Copies of sub-recipient and internal monitoring report(s) with work papers
Complaint log and file
Procedures established to minimize the time between the transfer of federal funds and the pay out of funds for program procurement files for contracts and RFP's
Corresponding procurement files for contracts and RFP's
Copy of property lease(s)
Copies of credit card statements for the monitoring period, with WIA-funded transactions highlighted
Policies - Procurement, Employee Handbook, Property Management, Monitoring
PY' 2014 - Internal Control Matrix (attached)

Please feel free to contact me at TWBrown@dwd.in.gov should you have any questions. Thank you in advance for your cooperation.

Attachment (1)

cc: bsuman@workonene.org

Announcement of Monitoring Visit Attachment

The following items are due to Thomas Brown by noon on Friday, January 17, 2014.

Documents Needed for Monitoring		
Document	Electronic	Paper On-Site
<i>Cost Allocation Plan</i> and resource sharing agreements;		
Accounting procedures manual;		
The most recent <i>A-133 Single Audit Financial Statements</i> ;		
<i>Chart of Accounts</i> ;		
Detailed year-to-date ledger(s) for all DWD funded grants and initiatives—including cost pools and purchasing journal;		
Current organizational charts (with names and titles) for the WIB Staff, and Service Providers; as well as current job descriptions for each position;		
Current WIB composition chart, including name and entity represented, and any Board vacancies;		
Youth Council composition chart (if applicable), including name and entity represented, and any Council vacancies;		
By-laws and articles for the WIB;		
Listing of all bank accounts and authorized signatories for the fiscal period beginning July 1 to current;		
A list of all contracts that were open during the grant period including dollar amount, and the type of contract (i.e., cost reimbursement, fixed unit price)—this includes contracts for Service Providers, Audit, Personal Service Agreements, Fiscal Agent, and Consultants;		
List of all One-Stop partners and associated MOU's;		
Listing of all procurements of over \$100K made during the monitoring period. Please indicate which of the following procurement methods was followed: <ul style="list-style-type: none"> ◆ Non-competitive Proposal/Sole Source transactions; ◆ Sealed Bid/Invitation for Bid transactions; or, ◆ Competitive Proposal/Request for Proposal transaction; 		
Listing of all equipment purchases of over \$5K made during the monitoring period;		
Monitoring policies -- instruments -- schedule;		
Amounts and funding sources for any bonus awarded since July 1, 2012;		
Meeting agendas from WIB meetings and Youth Council meetings for the prior twelve (12) months (including any executive sessions);		

py'14
Selected Pages



INDIANA
WORKFORCE
DEVELOPMENT

Indiana Department of Workforce Development
Oversight Division

Programmatic Monitoring Guide

Operational

Workforce Investment Act

WIB:

DATE(S):

MONITOR(S):

- Determine if a participant chooses to take a loan, that they will be counseled and that that counseling will be documented? Yes No N/A
Comments:

F. Assessment & Case Management Process

1. Does the local policy identify gateway activities and describe the circumstances for when specific gateway activities will be used? Yes No N/A
Comments:
2. Is assessment an on-going activity that continues throughout a participant's relationship with the intensive and training services? Yes No N/A
Comments:
3. Does the policy include whether intensive and training funds are limited and the priority for accessing? Yes No N/A
Comments:
4. Does the policy include the criteria for determining whether employment leads to self sufficiency? Yes No N/A
Comments:
5. Does the policy outline the conditions for accepting non-WIA assessments? Yes No N/A
Comments:
6. Does the local policy provide for the review and updating of employment plans for adults and dislocated workers? Yes No N/A
Comments:
7. What is the Region's definition of "self-sufficiency"?
Comments:
8. Do you know what the average caseload is per case manager in your region? Yes No N/A
Comments:

G. Grievance Policy/ Procedures

1. Does the local area have a policy/procedure for resolving grievances alleging violations of the Workforce Investment Act? *(Request a copy from the Regional Operator)* Yes No N/A
Comments:
2. Does the policy/procedure include information that:
 - Anyone may file? Yes No N/A
Comments:
 - Grievance must be filed within one (1) year of the alleged violation? Yes No N/A
Comments:
 - Shows the procedures for an informal resolution? Yes No N/A
Comments:

- Shows the procedures for a hearing; including taping? Yes No N/A
Comments:
 - Entities have sixty (60) days to resolve the grievance? Yes No N/A
Comments:
 - Grievances may be appealed to DWD when no decision is reached after sixty (60) days at the local level or if either party is dissatisfied with the decision? Yes No N/A
Comments:
 - The grievance may be appealed to the US Secretary of Labor within sixty (60) days of receipt of appeal? Yes No N/A
Comments:
 - Are all grievances listed on the quarterly complaint log?
(If yes, obtain a copy of the most recent log.) Yes No N/A
Comments:
3. Is the required non-discrimination notice part of the participant file? Yes No N/A
Comments:

H. Youth

1. Does the youth assessment include:
- A review of basic skills? Yes No N/A
Comments:
 - Occupational skills? Yes No N/A
Comments:
 - Prior work experience? Yes No N/A
Comments:
 - Employability? Yes No N/A
Comments:
 - Interest and aptitudes? Yes No N/A
Comments:
 - Support services needs? Yes No N/A
Comments:
 - Developmental needs? Yes No N/A
Comments:
2. Are Individual Service Strategies for clients contained in all files reviewed? Yes No N/A
Comments:
3. Do the services strategies include:
- An employment goal or plan? Yes No N/A
Comments:

J	Confidential Information and Document Security	Yes	N/A	No	Relevant Policy
J-1	Identifying information, including SSN's, addresses, dates of birth, employer account numbers, and Federal Identification Numbers are safeguarded.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-46
J-2	Reasonable efforts are made to prevent confidential records from being obtained or misused for any unauthorized purpose.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-46
J-3	When a desk or work area (including printers, copiers, and fax machines) is left unoccupied, confidential and/or privileged information is not left unattended.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-45
J-4	Employees are not permitted to take State of Indiana electronic or paper records off work premises to be utilized for personal reasons.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-45
J-5	Social Security Numbers are not disclosed to unauthorized persons or entities.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-46
J-6	When employees are not working directly with confidential documents, these documents are filed or stored in drawers/cabinets to prevent inadvertent disclosure of information.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-45
J-7	Employees only access confidential information to the extent they have permission or authority to access.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-45
J-8	Employees do not leave voicemail messages that contain Social Security Numbers.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-46
Comments:					

K	Document Destruction	Yes	N/A	No	Relevant Policy
K-1	If document destruction services are procured, there is a written agreement to adhere to the standards of Policy 2007-16 between the Regional Operator and the document destruction company providing the service.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-42
K-2	Documents are destroyed in such a manner as to ensure information contained on the records is unidentifiable.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-42
K-3	Documents are destroyed in a secure location.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-42
K-4	Employee notes and documents containing confidential information such as SSN's, that are not subject to the records retention policy, must be shredded.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-46
K-5	Confidential records are not discarded in trash bins, recycling containers, or other publicly accessible locations.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-42
Comments:					

L	Workplace Safety and Security	Yes	N/A	No	Relevant Policy
L-1	Policy established that prohibits the possession of weapons.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2009-06
L-2	Employee unauthorized use of cameras, including cell phone cameras is prohibited from use on the premises.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-45
L-3	Does office have a written emergency response plan?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
L-4	Does the office have a policy regarding hazardous chemicals?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
L-5	Employees do not share computer passwords with fellow workers.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	IRUA
L-6	Computers are used by employees in compliance with the Information Resources Use Agreement (IRUA) which is a statewide policy intended to improve the state's information security and guide state employees regarding appropriate use. (http://www.in.gov/iot/IRUA.htm)	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	IRUA
L-7	Does the office utilize security cameras? If so, how many cameras are there and are they currently monitored by an alarm company?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
L-8	Does the office utilize on-site security such as a security guard or off-duty police officer?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
Comments:					

M	Employee Notification	Yes	N/A	No	Relevant Policy
M-1	Employees were made aware of ethics rules which prohibit benefiting from, or permitting any other person to benefit from, confidential information as further outlined at http://www.in.gov/ig (Indiana Inspector General's Office.)	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-45
M-2	Employees were made aware that DWD adopted a zero tolerance policy for employees who fraudulently file for unemployment benefits or public relief while currently employed at DWD.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-39
M-3	Employees were made aware that, when injured, State Form #34401 must be completed and sent to HR immediately	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-40
M-4	Employees were made aware of tort claim procedures involving non-employees for accidents/injury to person/property.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-40
M-5	Employees were made aware of procedures in responding and reporting customer incidents involving workplace violence and possible actions if such conduct occurs.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2009-06
Comments:					

N	EEO Compliance & WorkOne Appearance	Yes	N/A	No	Relevant Policy
N-1	Is there EEO signage posted in a highly visible area within the WorkOne?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2008-04
N-2	Is the EEO signage formatted for non-english speaking individuals or individuals with visual impairments?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
N-3	Is there ample room for parking for both WorkOne employees and clientele?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
N-4	Is the WorkOne building itself in an acceptable functional condition?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
N-5	Are the grounds of the WorkOne facility in good condition and free from excessive trash or clutter?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
N-6	If any flags are publicly displayed (<i>Indiana State or The United States</i>) are they in acceptable enough condition for public presentation?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
N-7	Is the WorkOne sign easily seen from the road and is there easy access to the facility?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
N-8	Does the office possess sufficient amount of computers for public access?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
Comments:					

Indiana Department of Workforce Development

Fiscal Monitoring Guide

**For:
Program Years 2014 – 2015**

Entity Monitored _____
Name of Monitor(s) _____

Review Period _____
Monitoring Dates _____

Financial Management Systems

DWD monitors will be evaluating the grantee’s capacity to perform the financial management functions that are required when operating federally funded workforce development grants and assure the proper safeguards are in place to protect grant assets. Monitors will focus on financial management systems that relate to budgets, cash management, program income, cost allocation, allowable costs, internal controls and financial reporting.

A. Objective: Budget Controls The organization has a method for tracking planned expenditures that allows it to compare actual expenditures or outlays to planned or estimated expenditures [29 CFR 97.20(b)(4); 29 CFR 95.21(b)(4)]

Statement: The organization has an approved budget that is compared to actual expenditures on a regular basis (i.e., quarterly) to determine if it needs to modify its budget.

Process/Questions to Verify Statement:

- 1. Does the grantee periodically review planned vs. actual expenditures? _____
 - a. If yes, what frequency?-monthly/quarterly/other _____

- 2. What procedures are in place to handle large variances in program budgets or spending? _____
 - a. Is a modification warranted? _____
 - b. Is an investigation conducted to determine the reason for the variance? _____

- 3. Is management/administration staff informed of planned vs. actual status? _____

Comments _____

A. Objective: Cash Management. The organization’s cash draws are necessary and reasonable, and the timing and amount of such draws appear to be as close as possible to the actual disbursement of grant funds for the payment of allowable and allocable costs incurred by the grant [29 CFR 97.20(b)(3) & (7); 29 CFR 95.20(b)(3) & 95.22]

Statement: The grantee has a mechanism in place, including policies and procedures, to minimize the time between the transfer of funds from DWD and disbursement of funds to pay allowable costs. The grantee draws cash as close to the time of making disbursements as possible.

Process/Questions to Verify Statement:

Ask the organization for a print-out of their draw-downs and expenditures for two or more months. Compare their draw-downs to their expenditures for the same months. Have all the draw-downs been expended? Keep in mind that draw-downs should lag behind reported accrued expenditures.

1. How often does the organization draw down cash and how does it determine when and how much cash to draw down? _____

2. Does the organization follow its policies and procedures on cash management? _____

Statement: Grantees have mechanisms in place, including policies and procedures, to ensure accountability over other cash related activities.

1. Are bank statements reconciled with the official books of account each month? _____

2. Do bank reconciliation procedures provide for:
 - a. Accounting for all check numbers used? _____
 - b. Identifying outstanding checks? _____
 - c. Investigating all checks outstanding 30 days or more? _____
 - d. Voiding outstanding checks after a reasonable period of time? _____
3. Are payments received from contractors/vendors promptly deposited? _____
4. Does the grantee have a petty cash fund? _____
If so, how often is the petty cash fund reconciled? _____
5. Is payroll handled by a contracted payroll service? _____
6. Does the grantee have written policies for accruing and charging leave time? _____

C. Objective: Cost Allocation. The organization only allocates costs to the grant to the extent that a benefit was received [OMB Circular A-87 Attachment A; A-122 Attachment A; A-21 Section J].

Statement: The organization has written policies and procedures for distributing program costs, staff time, and general and administrative costs among programs. There are timesheets or other written evidence that costs being allocated to the grant are necessary and reasonable and are allocated to the grant based on benefit received. The organization has an approved indirect cost rate or cost allocation plan.

Process/Questions to Verify Statement:

1. Does the entity have an approved Cost Allocation Plan (CAP) or indirect cost rate? _____

2. On what basis are costs allocated? _____
3. Does the entity maintain documentation to support their allocations? _____

Comments _____

D. Objective: Internal Controls. Effective control, integrity, and accountability are maintained for all grant cash, personal property, and other grant assets [29 CFR 97.20(a)(2)(b)(3); 29 CFR 95.21(3)]

Statement: Grantee has adequate safeguards for all grant property and ensures that it is used solely for authorized purposes; has mechanisms in place to prevent unauthorized purchases and disbursements of grant funds; and safeguards its cash and other assets so no one person controls the order, receipt, payment, and reconciliation of an asset.

Process/Questions to Verify Statement:

1. Are duties separated adequately to ensure that one single person is not requesting, authorizing and issuing payment or checks? _____
2. Describe how transactions are appropriately authorized _____

3. Describe how assets are safeguarded _____

4. Describe budgetary controls _____

5. Describe the security in place for IT systems _____

6. Are journal entries approved by someone other than the Fiscal Manager? _____
7. Are monthly trial balances of the books of account current and available for review? _____

Comments _____

E. Objective: Financial Reporting. The entity has an accounting system that allows it to maintain accurate and complete disclosure of the financial results of its grant activities according to the financial reporting requirements of the grant [29 CFR 95.21(b)(1); 29 CFR 97.20(2)(b)(1)]

Statement: The entity maintains its books of account so it can develop and report accrual data on the financial status report. The grantee ensures its sub-recipients are reporting the financial results of its grant activities on an accrual basis and in a timely manner.

Process/Questions to Verify Statement:

1. Are financial reports submitted in a timely fashion? _____
2. If accruals are reported on the financial report, are the accruals accurate? _____

Review supporting documentation; trace selected cost(s), such as participant training, to/from financial reports.

Comments _____

F. Objective: Cost Classification. The entity maintains a system to ensure that grant costs are charged to the appropriate cost category [OMB Circulars A-87 ff...WIA 20 CFR 667.220]

functions include personnel, administrative and oversight, management information, and reporting systems. Functions not incorporated in *Financial Management Systems* are included in this section. In addition, activities are included when their purpose is to ensure compliance with applicable statutory, regulatory and grant requirements common to all ETA grants.

A. Objective: Administrative Controls Administrative Controls are sufficient to ensure grant integrity [29 CFR 97.40; 29 CFR Part 95].

Statement:

- The organization maintains policies and procedures for core management functions and program operations.
- Written monitoring tools and procedures are used to monitor all elements of the grant Statement of Work (SOW) against performance objectives and compliance with uniform administrative requirements.
- The organization maintains written documentation including monitoring reports, findings, corrective actions, and resolutions for each grant monitored.
- Record retention policies that meet the requirements of applicable federal laws and regulations are in place and followed.
- The grantee maintains a process for the closeout of grants and sub-grants.
- The grantee has a written grievance and complaint process that meets the requirements of applicable federal law and regulations and follows its process.

Process/Questions to Verify Statement:

1. Does the grantee fiscal staff have a copy of all necessary tools, e.g., the financial management TAG, OMB Circulars, Uniform Administrative Requirements, state policy? _____
2. Does the grantee monitor its sub-grantees on at least an annual basis? _____
3. Does the grantee issue written monitoring reports to its sub-grantees? _____
4. How soon after the monitoring is completed is the report issued? _____
5. Are the monitoring findings resolved: _____
6. Is the WIB record retention policy in compliance with applicable federal laws and regulations? _____
7. Does it reflect actual grantee organization practice? _____
8. Is the physical location of the space used for record retention adequate and accessible? _____
9. Are close-outs completed on a timely basis? (check with Bill Clark's unit prior to on-site visit. If not timely, discuss reason why with fiscal staff.)

Statement:

- The grantee has a system in place for the acquisition, management, and disposition of equipment purchased with grant funds.
- The grantee has sought and received prior approval to purchasing equipment and has written evidence of prior approval received for items of equipment purchased with grant funds.

Process/Questions to Verify Statement

1. Does the organization maintain an inventory of equipment purchased with ETA funds? _____
2. Does the equipment inventory include all required elements? _____
3. Has a control system been developed to ensure adequate safeguards to prevent loss, damage and theft of the property? _____
4. Does the entity have a disposition procedure and does it include all the necessary elements? _____
5. How and when does the organization obtain approval for the purchase of equipment?

Comments _____

E. Objective: Procurement. All procurement actions are conducted in a manner that provides for “full and open competition” [29 CFR 97.36; 29 CFR 95.40-48].

Statement:

- The organization follows their own procurement procedures which reflect applicable state and local laws and regulations, provided that their procurements conform to applicable federal laws and standards.
- The organization maintains a system for the administration of contracts, including appropriate contract or sub-recipient clauses.
- Reasonable profits paid to a commercial organization and negotiated separately as a dollar amount.

Process/Questions to Verify Statement

1. How does the organization assure that it conducts procurement activities in a manner to ensure full and open competition? _____

PY 2014 – 2015 MONITOR TRIPS, LETTER AND INFO SCHEDULE

DATE	TIME	REGION	ON-SITE	Letter Out	Info In
SEPT 22-26	10:30 AM LT	REG 6		AUG 22	SEPT 12
OCT 6-10	10:30 AM LT	REG 8	@ CROWE	SEPT 5	SEPT 26
NOV 17-21	11:00 AM LT*	REG 11	@ CROWE	OCT 17	NOV 7
DEC 8-12	10:30 AM LT	REG 7	@ CROWE	NOV 7	NOV 28
JAN 5-9, 2014	9:30 AM LT	REG 5		NOV 21	DEC 19
JAN 26-30	9:30 AM LT	IPIC		DEC 19	JAN 16
FEB 16-20	10:00 AM LT	REG 4		JAN 15	FEB 6
MARCH 9-13	11:00 AM LT	REG 9	@ CROWE	FEB 9	FEB 27
APRIL 6-10	12:00 PM LT	REG 2		MAR 6	MAR27
APR 27-MAY 1	11:00 AM LT	REG 3		MAR 27	APR 17
MAY 18-22	11:00 AM LT*	REG 1		APR 17	MAY 8
JUNE 8-12	12:00 PM LT	REG 10	@ CROWE	MAY 8	MAY 29

The team will consist of Bruce Hall, Carmen Upchurch, Jennifer Biddle, and supervisor, Thomas Brown.*

*12:00 pm Indianapolis Time



INDIANA
WORKFORCE
DEVELOPMENT
AND ITS **WorkOne** CENTERS

August 11, 2015

Mr. Jeff Williams
Vice President of Facility Operations
Major Hospital & Major Health Partners
150 West Washington Street
Shelbyville, IN 46176

Mr. Lance D Ratliff
Executive Director
Interlocal Association
836 S. State Street
PO Box 69
Greenfield, IN 46140

RE: PY 2014-2015 WIA Monitoring Report – REGION 05

Dear Mr. Williams and Mr. Ratliff:

The Workforce Investment Act (WIA) Section 184 (a)(4) and the Code of Federal Regulations (CFR) at 20 CFR 667.410 (b)(2) require each state to conduct an annual on-site monitoring of local workforce service areas (Regions) to ensure compliance with applicable administrative requirements. In accordance with this provision, the DWD Grant Oversight Unit began a programmatic, fiscal and administrative review of Region 05 on January 05, 2015.

The monitoring review determined compliance with statutory and regulatory requirements, and areas in need of administrative and/or programmatic improvement. The three (3) monitoring report sections are Background, Report Structure, and Analysis, which includes program review summaries, compliance findings, qualitative observations, technical assistance and guidance provided, and notable new initiatives and best practices.

If you have any questions regarding this report, please contact Thomas Brown, Grant Oversight Supervisor at (317) 233-4187 or twbrown@dwd.in.gov.

Respectfully,

A handwritten signature in black ink, appearing to be "CB", written over a horizontal line.

Connie Berry, Counsel/Director
DWD Regulatory Oversight & Compliance
(317) 233-6078
ceberry@dwd.in.gov

Michael R. Pence, Governor
Steven J. Braun, Commissioner

10 N. Senate Avenue
Indianapolis, IN 46204-2279
www.IN.gov/dwd

Phone: 317.232.7670
Fax: 317.233.4793

An Economic Development Partner



**Comprehensive Monitoring Report
Program Year 2014-2015**

REGION 05 WORKFORCE INVESTMENT BOARD
C/O LANCE D RATLIFF, EXECUTIVE DIRECTOR
INTERLOCAL ASSOCIATION
836 S. STATE STREET, PO BOX 69
GREENFIELD, IN 46140

ON-SITE VISIT: January 05-09, 2015

MONITORING PERIOD: July 2014 – December 2014

MONITOR(S): Thomas Brown, Grant Oversight Supervisor
Carmen Upchurch, Grant Oversight Monitor
Jennifer Biddle, Grant Oversight Monitor
Bruce Hall, Grant Oversight Monitor

BACKGROUND

COUNTIES WITHIN REGION: Boone, Hamilton, Hancock, Hendricks, Johnson, Morgan and Shelby

GRANT RECIPIENT: Region 05 Workforce Investment Board

FISCAL AGENT: Region 05 Workforce Investment Board

ADMINISTRATIVE ENTITY: Interlocal Association for the Region 05 Workforce Investment Board

The following areas were selected for the comprehensive compliance review: Local Workforce Investment Board; One-Stop System/One-Stop Operator; Memoranda of Understanding; Rapid Response; Limited Funds and Priority of Service; Self-Sufficiency; Supportive Services; Subrecipient Monitoring and Oversight; Core, Intensive, and Training Services; Eligible Training Provider Lists; Individual Training Accounts (ITA); Follow-Up and Post Placement Services; Youth Programs; Objective Assessments; Individual Service Strategies (ISS); Youth Program Design; Youth Program Follow-up Services; Common Measure Performance Indicators; Case Management and File Maintenance; Cost Allocation Plan, Accounting Procedures and Reports, Bank Accounts and General Ledgers, Credit Cards and Disbursements; A-133 Single Audits; Organizational Charts and Job Descriptions; Salaries, Timesheets and Payroll Records; WIB By-Laws and Articles; Contracts, Requests for Proposals (RFPs) and Procurement; Inventory; Equal

Opportunity (EO); Property Leases; Regional Policies.

Interlocal Association serves as staff to the Region 05 Workforce Investment Board, which is the grant recipient. WIA client services are provided by workforce services partners JobWorks in the seven (7) counties of Boone, Hamilton, Hancock, Hendricks, Johnson, Morgan, and Shelby, and by JobSource in Madison County. The seven (7) WorkOne offices within this eight (8) county region include:

1. Boone County WorkOne Express located in Lebanon, IN
2. Hamilton County WorkOne Express located in Fishers, IN
3. Hancock County WorkOne Express located in Greenfield, IN
4. Hendricks County WorkOne located in Plainfield, IN
5. Johnson County WorkOne located in Franklin, IN
6. Madison County WorkOne located in Anderson, IN
7. Shelby County WorkOne Express located in Shelbyville, IN

On-site monitoring was conducted in January 2015 by the DWD Grant Oversight division at the Interlocal Association's office located in Greenfield, Indiana and various WorkOne Centers within the region. An entrance conference with appropriate personnel occurred, and various program, fiscal and administrative records and participant files were selected for evaluation. Monitoring included the review and analysis of documentation and discussions.

There were three (3) compliance findings identified in the PY2013-2014 Monitoring, and no questioned costs. All issues have subsequently been satisfactorily resolved.

REPORT STRUCTURE

This monitoring report is divided into sections with evaluations regarding specific compliance areas. For WIA-related compliance (Sections 1-3), findings and observations will be included, as applicable, within the appropriate section. WIA Findings and observations, for purposes of this monitoring report, are defined below:

- **Findings**
Topics found not in compliance with the Act, federal regulations, or state or Indiana Department of Workforce Development (DWD) policies and procedures will be addressed. Citations from the Act, federal regulations, or state or DWD policies and procedures are identified where appropriate. Recommendations are offered on how to bring the topic into compliance.
- **Observations**
Topics which may or may not be compliance-based, but which may impede effectiveness and efficiency of services to individual and business customers will be addressed. Suggestions are offered on how to make qualitative improvements to improve service, and may also include a referral for technical assistance.

COMPLIANCE AREAS

A. Administration

This section will entail an evaluation of the Region's Workforce Investment Board and subcommittees, the WorkOne system, the Region's administrative policies and practices, and the Region's subrecipient monitoring and oversight, according to applicable federal and state legislation, regulations, policies and guidance, and OMB Circulars and Uniform Guidance.

B. Disability Employment Initiative (DEI)

This section will entail an evaluation by DWD Oversight Monitors and the DWD EO/DEI Program Director of the Region's DEI programs, if applicable.

- C. Equal Opportunity (EO)**
This section will entail an evaluation by DWD Oversight Monitors and the DWD EO/DEI Program Director of the Region's EO and Americans with Disabilities Act (ADA) programs.
- D. Foreign Labor Certification (FLC)**
This section will entail an evaluation by the DWD FLC Specialist of the Region's Foreign Labor Certification (FLC) program, if applicable.
- E. Inventory/Asset Management**
This section will entail an evaluation by the DWD Asset Manager of the Region's Inventory and related processes.
- F. Jobs for America's Graduates (JAG)**
This section will entail an evaluation by the DWD Strategic Initiatives unit of the Region's JAG program pursuant to the requirements of JAG National and WIA Youth.
- G. National Emergency Grants (NEG)**
This section will entail an evaluation by the DWD NEG Administrator of the Region's NEG program, if applicable and when DWD in the grantee.
- H. Rapid Response (RR)**
This section will entail an evaluation by DWD Oversight Monitors and the DWD Rapid Response Program Director of the Region's RR activities and efforts.
- I. Reemployment Services (REA/WPRS/JFH)**
This section will entail an evaluation by the DWD Oversight Monitors and the DWD Reemployment Services Program Director of the Region's Reemployment Services programs and initiatives.
- J. Trade Adjustment Assistance (TAA)**
This section will entail an evaluation of the Region's TAA program conducted by the DWD Dislocated Worker Unit (DWU).
- K. Veterans Programs**
This section will entail an evaluation by the State Veterans Employment and Training Service (VETS) Program Director of the Region's programs and efforts to provide required services to veterans and eligible spouses.
- L. Wagner-Peyser (WP)**
This section will entail an evaluation by the DWD Oversight Monitors and DWD Field Operations Regional Directors of the Region's management and provision of WP-funded labor exchange services, the physical WorkOne offices and computer systems which provide these services.
- M. Workforce Investment Act (WIA) Adult, Dislocated Worker, and Youth**
This section will entail an evaluation by the DWD Oversight Monitors of the Region's programs and services to eligible participants pursuant to WIA Section 184(a)(4) and related federal and state legislation, regulations, policies and guidance, and OMB Circulars and Uniform Guidance.
- N. Performance Measure Summary**
The data in this section provides information regarding how the Region has performed in the common measure performance requirements.
- O. Technical Assistance**

This section will outline technical assistance provide to and/or requests from program operators, elected officials, program staff and/or service providers for technical assistance and/or training.

P. New Initiatives and Best Practices

New, unique, significant or innovative programmatic efforts or results, or practices which are noteworthy or exemplary will be mentioned in this section.

ANALYSIS

A. Administration

1. Summary of the Review: Administration

Monitors reviewed WIB, Youth Council, and WIB Executive Committee membership records, agendas and minutes, One-Stop partner MOUs, the most recent A-133 single audit, EO complaint logs, various banking and accounting records and procedures, various administrative policies and procedures, various contracts, procurement and RFP files, staffing and payroll records, and property leases and inventory.

2. Compliance Findings: Administration

(a) Lack of Adequate Internal Controls

The timesheet for the Executive Director for the pay period ending 12/13/14 (pay date 12/24/14) was found to be signed (by the employee) and approved (attested by) by the same individual, the Executive Director himself. Upon inquiry by DWD Monitors, the Interlocal Association Controller produced the document "Resolution 2013-2" issued by the Interlocal Association Board on September 23, 2013, that establishes authorization of Interlocal Association and its Executive Director to enter into contractual agreements on behalf of or otherwise obligate the Interlocal Association Board. The Interlocal Association Controller indicated the Interlocal Association Executive Director and staff interprets this authority to extend to and include the Executive Director's personal timesheet.

DWD Legal and Oversight disagree with Interlocal Association staffs' interpretation of Resolution 2013-2 approved by the Interlocal Association Board. WIA grant recipients are bound by federally mandated measures of internal control and compliance with uniform administrative requirements and OMB circulars and rules (WIA Sec 184(3)). Additionally, grantees must maintain records sufficient to permit tracing of funds adequate to ensure that funds have not been spent unlawfully (WIA Sec 185), and operate within federal grant management guidelines for accounting procedures and internal controls (29 CFR 97.20(a)(2) and (b)(3); OMB A-133). WIA legislation and rules and OMB circular language leads DWD to believe the individual performing a task should not also be the same individual reviewing and approving that task. Interlocal Association's practice of permitting the same individual to process, review, and approve a task demonstrates a lack of internal control and violates the requirement of segregation of process and administrative review and approval.

(b) Authority

- WIA Sec. 184 (3)(A). Fiscal Controls; Sanctions. (3) Uniform Administrative Requirements. -- (A) In General. -- Each State (including the Governor of the State), local area (including the chief elected official for the area), and provider receiving funds under this title shall comply with the appropriate uniform administrative requirements for grants and agreements applicable for the type of entity receiving the funds, as promulgated in circulars or rules of the Office of Management and Budget.
- WIA Sec. 185 (A)(1). Reports; Recordkeeping; Investigations. (A) Reports. -- (1) In General. -- Recipients of funds under this title shall keep records that are sufficient to permit the

preparation of reports required by this title and to permit the tracing of funds to a level of expenditure adequate to ensure that the funds have not been spent unlawfully.

- 29 CFR § 97.20 (a)(2) and (b)(3): 20 CFR § 97.20. Standards for Financial Management Systems. (a) A State must expand and account for grant funds in accordance with State laws and procedures for expending and accounting for its own funds. Fiscal control and accounting procedures of the State, as well as its sub-grantees and cost-type contractors, must be sufficient to— (1) Permit preparation of reports required by this part and the statutes authorizing the grant, and (2) Permit the tracing of funds to a level of expenditures adequate to establish that such funds have not been used in violation of the restrictions and prohibitions of applicable statutes. (b) The financial management systems of other grantees and sub-grantees must meet the following standards: (1) Financial reporting. Accurate, current, and complete disclosure of the financial results of financially assisted activities must be made in accordance with the financial reporting requirements of the grant or subgrant. (2) Accounting records. Grantees and sub-grantees must maintain records which adequately identify the source and application of funds provided for financially-assisted activities. These records must contain information pertaining to grant or subgrant awards and authorizations, obligations, unobligated balances, assets, liabilities, outlays or expenditures, and income. (3) Internal control. Effective control and accountability must be maintained for all grant and subgrant cash, real and personal property, and other assets. Grantees and sub-grantees must adequately safeguard all such property and must assure that it is used solely for authorized purposes.
- OMB A-133 (on Internal Control): Internal control pertaining to the compliance requirements for Federal programs (Internal control over Federal programs) means a process—effected by an entity's management and other personnel—designed to provide reasonable assurance regarding the achievement of the following objectives for Federal programs: (1) Transactions are properly recorded and accounted for to: (i) Permit the preparation of reliable financial statements and Federal reports; (ii) Maintain accountability over assets; and (iii) Demonstrate compliance with laws, regulations, and other compliance requirements; (2) Transactions are executed in compliance with: (i) Laws, regulations, and the provisions of contracts or grant agreements that could have a direct and material effect on a Federal program; and (ii) Any other laws and regulations that are identified in the compliance supplement; and (3) Funds, property, and other assets are safeguarded against loss from unauthorized use or disposition.
- OMB Circular A-133, May 2014 Compliance Supplement, Part 6 – Internal Control, Control Activities are the policies and procedures that help ensure that management's directives are carried out... "Adequate segregation of duties provided between performance, review, and recordkeeping of a task."

(c) Resolution

The WIB must immediately develop, document and implement an internal control process and procedure with adequate segregation of duties which corrects this finding of a lack of internal control (i.e., the Executive Director signing and approving his own timesheet) and then provide DWD with a copy of the document.

3. Qualitative Observations: Administration

(a) Submitting Electronic Documents For Monitoring

The Interlocal Association submitted many of the documents requested for monitoring in the electronic format (i.e., flash drive) as requested. However, it failed to contact the DWD Grant Oversight division, as requested in the November 21, 2014 monitoring announcement letter, to request an exception to the electronic format requirement and discuss the volume of documents that would not be provided electronically by the December 19, 2014 deadline. Items not provided electronically included:

- Copies of general ledgers

- AERs
- Trial balances
- Bank statements and reconciliations
- Payroll detail and timesheets
- Procurement files and supporting detail
- Credit card statements and supporting detail
- Active contracts
- Property leases

Additionally, the documents that were provided electronically were scanned into a single 484-page PDF document that lacked section headings or identifying information that made it very difficult to determine exactly what the document represented. Future submission of required monitoring documents must:

- Include all requested documents with clear and proper identification of those documents; and
- Be reasonably organized for quick reference and determination of content. Interlocal Association is urged to update its systems to allow more requested documents to be submitted electronically.

B. Disability Employment Initiative (DEI)

1. Summary of the Review: Disability Employment Initiative (DEI)

No information was reported for Region 05.

2. Compliance Findings: Disability Employment Initiative (DEI)

There were no substantial areas of noncompliance identified within the scope of this review.

3. Qualitative Observations: Disability Employment Initiative (DEI)

There were no qualitative observations noted within the scope of this review.

C. Equal Opportunity (EO)

1. Summary of the Review: Equal Opportunity (EO)

No compliance issues were reported for Region 05 by the DWD EO/DEI Program Director. Monitors reviewed complaint logs, signage within the WorkOne offices visited, and documentation within client files, and found no issues.

2. Compliance Findings: Equal Opportunity (EO)

There were no substantial areas of noncompliance identified within the scope of this review.

3. Qualitative Observations: Equal Opportunity (EO)

(a) The State EO/DEI Program Director conducted a desk review of Region 5 in 2012. The items below were identified in the region's response as areas that were going to be looked into further by the region or remedied:

- Ensure that internal and external communications, including, but not limited to, the "EO is the Law" Notice contain the Local EO Officer's contact information.
- Ensure the WIA tagline is included in marketing materials, per DWD Policy 2012-03, Pg 6. If a phone number is included, ensure it is accompanied by a TDD/TTY or Relay number.
- Is the international symbol for accessibility for individuals with disabilities posted by building entrances that are wheelchair accessible?

- Do designated restrooms have appropriate signage available for individuals with disabilities?
- The monitoring response stated that the website may not be fully accessible.

(b) ADA checklists were submitted for Region 5's WorkOne offices. The State EO/DEI Program Director will follow-up with the Local EO Officer to identify any outstanding issues.

D. Foreign Labor Certification (FLC)

1. Summary of the Review: Foreign Labor Certification (FLC)

No activity was reported for Region 05.

2. Compliance Findings: Foreign Labor Certification (FLC)

There were no substantial areas of noncompliance identified within the scope of this review.

3. Qualitative Observations: Foreign Labor Certification (FLC)

There were no qualitative observations noted within the scope of this review.

E. Inventory/Asset Management

1. Summary of the Review: Inventory/Asset Management

Region 5 has a total of one hundred and fifteen (115) assets listed on their inventory. During inventory, six (6) assets were not found. The DWD Asset Manager has no outstanding issues with the Region 05.

2. Compliance Findings: Inventory/Asset Management

There were no substantial areas of noncompliance identified within the scope of this review.

3. Qualitative Observations: Inventory/Asset Management

There were no qualitative observations noted within the scope of this review.

F. Jobs for America's Graduates (JAG)

1. Summary of the Review: Jobs for America's Graduates (JAG)

The DWD Strategic Initiatives staff conducted visits to the two (2) Regional Managers in the region. The discussion for the June 27, 2014, visit included, but is not limited to: there are two service providers in the region – Job Works and Job Source. The Regional Manager has other responsibilities and a change in service provider leadership has resulted in the Manager being pulled into other things. The current JAG Coordinator works part-time. The Regional Manager has suggested that the organization hire a full-time JAG Coordinator/Quality Assurance data person for JAG and other programs. The current JAG Coordinator will have to reapply for the new full-time JAG Coordinator position. The Regional Manager supervises three (3) JAG Specialists. A RFP for service provision will be released in March 2015 and the two (2) service providers will be competitors. The Regional Manager discussed that the WIB Director needs to be more proactive in getting the two (2) providers together, but is very involved. There was a discussion on needing reports and information from one person on a regional basis and determining who would take the lead. The Regional Manager has weekly meeting with staff and then moves to every two (2) weeks as they get into the school year. During the summer, staff is working for four (4) weeks from the Work One office. Next year there is a dedicated classroom, replacing the shared room from this year. Sometimes both service providers come together for training, but not often. The Regional Manager had requested to be part of the other provider's training.

Discussion for the July 30, 2014, Regional Manager visit included but is not limited to: The Regional

Manager is brand new and was provided manager's training during this visit. The Manager was promoted from the JAG Specialist in the last month. Talked about required meetings and reports and how often they occur, including the manager meetings, the manager's monthly report and the coordinator's report. The distance to the various high schools for the Regional Manager ranges from 45 minutes to 1.5 hours. The Regional Manager's focus is on getting the student's grades up. Grades and attendance must be good before going on any trips. Spoke about the importance of getting good grades to graduate from high school and enter college but also spoke about the type of students in the program and having a balance so the youth can go on trips. The students will motivate each other. Suggested for students to call each other and motivate each other to come to school so they can also go on trips. Discussed the Career Association and shared ideas on ways to conduct the meetings and provided resources for Career Association activities.

The DWD Strategic Initiatives Director indicated the following trainings and/or meetings were conducted by DWD staff from July 1 through December 18, 2014:

- SWIC (State Workforce Investment Council (SWIC) Youth Council Committee Meeting – August 15 and December 18, 2014
- JAG National Training (July 14 – 18, 2014)
- Statewide JAG Training – (July 21 – 24, 2014)
- Quarterly State Youth Director's Meeting – August 11, 2014 and November 5, 2014 (Joint Adult Ed-Youth meeting), and
- State JAG Program Manager's Meeting – August 12, 2014 and November 6, 2014.

(a) Highlights from the meetings (in no particular order) are provided:

- The JAG Manager's Meeting was conducted on November 6, 2014. Topics included but were not limited to: marketing; a JAG program sustainability discussion; a recap of the Vincennes University tour; a discussion on college tours in general; tools for the classroom including Indiana Career Explorer and financial/banking literacy; roundtables discussing the next Career Development Conference, College Application Day, and data; and best practices.
- The Joint Adult Education/Youth Director Meeting was held on November 5, 2014 at the Lawrenceburg Ivy Tech.
- The morning agenda included an overview of the Workforce Innovation & Opportunity Act (WIOA) and highlighted sections pertaining to Adult Literacy and Youth Programs. Regions 5 & 12 have high referrals of youth in some areas but not so much in other areas; Marion County has low referral number for Adult Ed to WIA Youth program and Region 5 is at 33 percent; it has been challenging to establish local relationships, communicate with partners and understand their programs; there is a need/demand for additional out-of-school youth services since there are high dropout rates but finding such youth is an issue due to their barriers; the region has on-line counseling available for students and expanding to youth; there is a small Business Association for entrepreneurial skills.

(b) Youth Director Meeting in the afternoon: The first items on the agenda included announcing new DWD and regional staff. Region 5 indicated a need for statistics regarding current and possible Adult Ed referrals for out-of-school youth population; there is a need for bridges with other community organizations; there is a need for public service announcements for work experiences and employers; the WIOA Town Hall is scheduled for November 20th; the differences between Adult Ed providers in Marion County and Region 5 have been very frustrating for staff; there is a need for one page summary regarding referrals for Adult Ed staff.

- The Workforce Innovation and Opportunity Act (WIOA) will be replacing several current federal workforce development programs and takes effect in Indiana and across the nation on July 1, 2015. WIOA places a major emphasis on the out-of-school population which may have a negative impact on Indiana's in-school JAG program.

- Indiana received many awards at the JAG National Training Seminar. In July. In addition to the seventeen (17) award winning JAG Specialists; JAG Indiana won an award for the most scholarship funds received by JAG students. Also, Indiana JAG was awarded the honor of having the highest delegation of attendees at the training.
- The superintendent of the Greater Clark County School Corporation spoke on its college and career readiness initiative and the work ethic certification program launched for the 2014-15 school year. The college and career readiness initiative intends to prepare students for post-secondary opportunities or the workforce. The curriculum was shared with employers for their input. The work ethic program is entitled PRIDE.
- Indiana received a \$1.13 million National Incentive Award for meeting and/or exceeding performance measures for the PY13 WIA, Adult Education and the Technical Education programs. With the funding, Indiana intends to serve two hundred and forty (240) individuals through a combined WorkIndiana and Work Experience program. The participants will be a combination of JAG students and Adult Education program participants. Through WorkIndiana, participants will earn a high school diploma/ certification and also earn a credential in an entry-level occupation. The work experience will last six (6) weeks and be closely aligned with the youth's credential program of interest. Pay ranges for the work experience component will vary based on the employer. The program has rolling start dates beginning January 2015.

2. Compliance Findings: Jobs for America's Graduates (JAG)

There were no substantial areas of noncompliance identified within the scope of this review.

3. Qualitative Observations: Jobs for America's Graduates (JAG)

There were no qualitative observations noted within the scope of this review.

G. National Emergency Grants (NEG)

1. Summary of the Review: National Emergency Grants (NEG)

DWD staff was emailed the Quarterly Performance Data Report from the Chief Operations Officer.

2. Compliance Findings: National Emergency Grants (NEG)

There were no substantial areas of noncompliance identified within the scope of this review.

3. Qualitative Observations: National Emergency Grants (NEG)

There were no qualitative observations noted within the scope of this review.

H. Rapid Response (RR)

1. Summary of the Review: Rapid Response (RR)

The Rapid Response Program Director completed the Department of Labor's Rapid Response Self-Assessment contained in Training & Employment Notices (TEN) 32-11 and 31-11 on August 7, 2014. The Rapid Response Teams are very well prepared at the Rapid Response Orientation sessions – sign-in sheets distributed; demographics collected and entered into track One; calendar of events shared with the participants; on-site workshops and job fairs provided as a norm; a list of all county Work One locations provided; Hardest Hit fund (mortgage assistance) information provided; an abundance of community resources in a packet provided; and programs for ex-offenders shared. Region 5 has a very good understanding of how Rapid Response services should be provided. Business Services Representatives (BSR) lead all efforts with Rapid Response services and are very responsive to employer's needs and expectations. All Rapid Response reports are consistently on-time.

2. Compliance Findings: Rapid Response (RR)

There were no substantial areas of noncompliance identified within the scope of this review.

3. Qualitative Observations: Rapid Response (RR)

Recommendations provided:

- Surveys administered in the beginning of Rapid Response sessions and not at the end. There is a better response rate if surveys are done in the beginning.
- Need to be more aligned with economic development agencies
- More LMI and retraining seminars need to be provided
- The UI 800 line should have more staff answering calls

I. Reemployment Services (REA/WPRS/JFH)

1. Summary of the Review: Reemployment Services (REA/WPRS/JFH)

New REA program changes and changes in Track One from October are still being finessed and system issues resolved. Fisher's WorkOne has a new REA program and has not had enough claimants to provide REA services in the office. Claimants are being served in Anderson. Changes to the data entry screens are still being adjusted. Feedback on data entry errors will be provided to Region 5 soon. Indiana is participating in a special REA study beginning March 2015 that is funded by the US Department of Labor. Abt Associates, Inc. will be conducting the study.

2. Compliance Findings: Reemployment Services (REA/WPRS/JFH)

There were no substantial areas of noncompliance identified within the scope of this review.

3. Qualitative Observations: Reemployment Services (REA/WPRS/JFH)

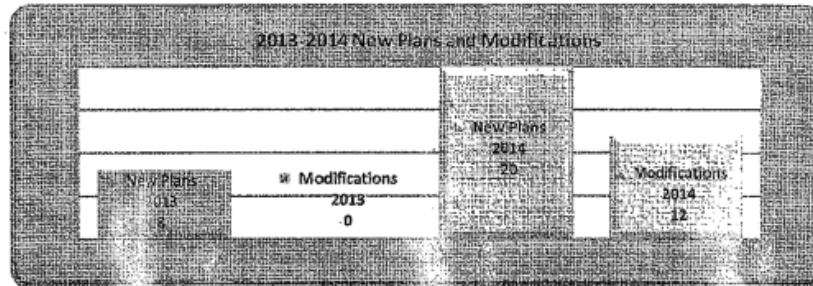
There were no qualitative observations noted within the scope of this review.

J. Trade Adjustment Assistance (TAA)

1. Summary of the Review: Trade Adjustment Assistance (TAA)

New case managers were hired into the Plainfield and Franklin WorkOne offices in late 2013 and early 2014. The Dislocated Worker Unit provided one-on-one (in-person) technical guidance with the new TAA Case Managers in the Plainfield office and assisted these case managers with case management and enrollment for several new participants. The Dislocated Worker Unit provided specialized one-day training in the Plainfield office with the new case managers from the Plainfield and Franklin WorkOne offices.

The TAA enrollments in Region 5 have risen during the 2014 calendar year with large dislocations from AGI Shorewood and John Wiley and Sons, Inc. This prompted the need for additional case managers as mentioned in the paragraph above. There were no new training plan modification requests in 2013. Please see the graph below for an illustration of the increase in volume in new training plans and modifications for existing training plans.



2. Compliance Findings: Trade Adjustment Assistance (TAA)

There were no substantial areas of noncompliance identified within the scope of this review.

3. Qualitative Observations: Trade Adjustment Assistance (TAA)

(a) The Region 5 Comprehensive Review was conducted in April 2014. Compliance issues included, but were not limited to the following:

- Region 5 does not have a high engagement rate into TAA-funded services such as training, A/RTAA, Job Search or Relocation benefits
- Case managers are not effectively developing and updating Individual Employment Plans (IEPs), effectively providing comprehensive skill assessments to all TAA eligible individuals, and providing timely monthly student check-ins for all participants in TAA-approved training. Consequently, potential TRA eligibility is at-risk and the likelihood for over-payment situations is increased.
- *Note: The issues that were found have been addressed and resolved.*

K. Veterans Programs

1. Summary of the Review: Veterans Programs

Region 5 has been attentive to the goals and guidance set forth in the Jobs for Veterans State Grant Program. Any issues or concerns have been addressed promptly by the region.

2. Compliance Findings: Veterans Programs

There were no substantial areas of noncompliance identified within the scope of this review.

3. Qualitative Observations: Veterans Programs

There were no qualitative observations noted within the scope of this review.

L. Wagner-Peyser (WP)

1. Summary of the Review: Wagner-Peyser (WP)

WorkOne facilities, operations and customer flow were observed and discussions held with various staff, management and customers inside various WorkOne offices within the Region.

2. Compliance Findings: Wagner-Peyser (WP)

There were no substantial areas of noncompliance identified within the scope of this review.

3. Qualitative Observations: Wagner-Peyser (WP)

There were no qualitative observations noted within the scope of this review.

M. Workforce Investment Act (WIA) Adult, Dislocated Worker and Youth Programs

1. Summary of the Review: WIA Adult, Dislocated Worker and Youth Programs

Adult Dislocated Worker and Youth participant files were reviewed during the monitoring process. Files were well maintained and of good content to include all pertinent forms and data along with ample case notes. There was a clear paper trail providing continuity from time of application through completion of services. All data had been entered in TrackOne.

2. Compliance Findings: WIA Adult, Dislocated Worker and Youth Programs

There were no substantial areas of noncompliance identified within the scope of this review.

3. Qualitative Observations: WIA Adult, Dislocated Worker and Youth Programs

(a) TrackOne Client Files

This year's review of WIA client files on Track One showed significant improvement over last year, particularly in the Youth category. The improvements noted included:

- More detailed case notes that fully documented the justification for services provided
- Improved service strategies that included more clearly defined goals and detailed steps to achieve those goals
- Better tracking of clients' progression through the WIA tiers of service, and
- More complete case notes in the files of WIA Youth clients being served with the JAG program.

(b) Improved Case Files

Members of the WIB staff provided case managers with numerous training sessions over the course of the year to ensure improved case files. Special emphasis was placed on properly documenting all goals, activities and services for WIA Youth clients in both the Track One and JAG Program systems. In addition, the new Region 5 JAG coordinator worked closely with Youth staff to implement the techniques and procedures in which they had been trained. It is anticipated that improvement will continue as more training opportunities are provided.

N. Data Validation

The Region's Data Validation results for the current program year continued to be weak, but the files selected for review reflect policies and decisions made by the previous Regional Operator. It is anticipated improvement will come as soon as the Data Validation sample includes files managed by the current WJB staff.

O. Performance Measure Summary

Cumulative 4-Quarter Performance: Region 5 Workforce Board, Servicing Workforce Service Area 05

Local Area Name <u>Region 5 WIB</u>	Total Participants Served (10/01/2014 – 12/31/2014)	Adults	15,663
		Dislocated Workers	1,160
		Total Youth	722
		Younger Youth	
ETA Assigned Number	Total Exits	Adults	14,239

18185	(10/01/2013 – 09/30/2014)	Dislocated Workers	694
		Total Youth	328
		Younger Youth	
		State	Region
Customer Satisfaction	Program Participants Employers		
Entered Employment Rates	Adults	71.7%	74.4%
	Dislocated Workers	74.0%	81.8%
	Older Youth		
Retention Rates	Adults	85.3%	83.7%
	Dislocated Workers	88.1%	90.2%
	Older Youth		
	Younger Youth		
Average Earnings	Adults	\$12,677	\$12,292
	Dislocated Workers	\$14,747	\$16,122
Six Months Earnings Increase	Older Youth		
Credential/Diploma Rates	Adults		
	Dislocated Workers		
	Older Youth		
Skill Attainment Rates	Younger Youth		
	Younger Youth		
Placement in Employment or Education	Youth (14-21)	71.7%	69.6%
Attainment of Degree or Certificate	Youth (14-21)	69.0%	65.7%
Literacy and Numeracy Gains	Youth (14-21)	44.0%	39.9%
Expenditures: July 1, 2014 through September 30, 2014			
WIA Adult		\$398,072	

WIA Dislocated Worker	\$504,698
WIA Youth	\$249,030
Total	\$1,151,880

Participant Enrollments and Exits: Snapshot of a Three-Month Period		
	Participants: 10/01/14 – 12/31/14	Exiters: 06/01/14 – 09/30/14
WIA Adult	5,021	3,154
WIA Dislocated Worker	611	253
WIA Youth	434	95

P. Technical Assistance

The Dislocated Worker Unit provided additional technical guidance and provided in-depth TAA Skill Development Training in September 2014 clarifying the compliance issues identified in the comprehensive review. Also, a TAA webinar training was conducted in early September 2014 focusing on Individual Employment Plan (IEP) documentation required for files and the Track One case management system. These issues have improved since the TAA Comprehensive Review was conducted in 2013.

Q. New Initiatives and Best Practices

(a) Best practices identified in the Comprehensive TAA Review include:

- Staff is enthusiastic about learning and improving performance with the TAA program to better serve a larger portion of certified clients, and
- A good blend of training providers were utilized by the clients enrolled in TAA-approved training.

Pg 14

DWD RISK ASSESSMENT TOOL FOR REGIONS

Instructions: DWD Program Director will respond YES, NO or N/A for each question below, adding an explanation for any YES response. A response of YES may indicate possible risk. Expand each line item as needed, and use alternate font color or highlight for response, if desired. Include any program activity summaries and additional comments at the end of this Risk Assessment document. Return the completed Risk Assessment to Oversight@dwd.in.gov. Program Director feedback will be incorporated into the final DWD Monitoring Report issued to the WDB by the DWD Regulatory Oversight and Compliance Division.

<u>DWD Program Director(s) Completing Risk Assessment</u>	<u>Region #</u>	<u>Date Risk Assessment Completed</u>
Jane Jackson & Jim Johnson	00	09/15/2015

General Assessment

1. Is the WDB or Service Provider new to operating or managing state and/or federal funds (has not done so within the past five years)?
2. Is this program new for the entity (managed for less than three years)?
3. Has there been high staff turnover or agency reorganization that affects this program?
4. Are the staff assigned to the program inexperienced with the program (worked with the program for less than two funding cycles)?
5. Has the Region been untimely in the submission of:
 - a. Applications?
 - b. Amendments?
 - c. Fiscal Reporting?
 - d. Draw Downs?
 - e. Budgets/Revisions?
6. Has the Region failed to respond timely to program/fiscal questions?
7. Have any other entities (e.g., program officers, auditors, staff employed by the entity, etc.) provided alerts of potential risk areas?
8. Does the Region lack effective operational and fiscal procedures and controls?

Program Monitoring & Audit Assessment

9. Were any compliance issues identified by DWD Program Staff during the most recent program monitoring?
10. Are any program compliance issues outstanding or unresolved?
11. Did the most recent A-133 Audit reveal any areas of concern?
12. Are any A-133 Audit concerns outstanding or unresolved?

Financial Reporting/Procedures Assessment

13. Is this grant large in terms of percentage of overall funding for the entity?
14. Did the WDB request to carry-over a percentage larger than 20 percent in any of its funding streams from one program year to another?
15. Has WDB requested more than 2 budget revisions during a single program year?
16. Does the WDB's accounting system fail to identify the receipts and expenditures of program funds separately for each award?
17. Do the budget reports fail to reflect program fund amounts?
18. Does the WDB's accounting system fail to provide for the recording of expenditures for each award by the budget cost categories shown in the approved budget?
19. Do the budget reports fail to reflect award amounts?

Legal Assessment

20. Does the WDB or the Service Provider previously or currently have a lawsuit(s) filed against it?
If yes, please list all pending and/or previous lawsuits with detailed information regarding who filed the lawsuit, the reason for filing and the final judgment rendered.
21. Is the WDB or any Service Provider currently or previously suspended or debarred?



INDIANA
WORKFORCE
DEVELOPMENT
AND ITS **WorkOne** CENTERS

PY'15

March 4, 2016

Mr. David Walters, Board Chair
Northern Indiana Workforce Board
130 S. Main St, Suite 400
South Bend, IN 46634
dwalters@gibsoninc.com

Mr. Greg Vollmer, President/CEO
Northern Indiana Workforce Board
600 E. Carmel Drive, Suite 145
Carmel, IN 46032
gvollmer@gotoworkone.com

RE: Announcement of On-site PY2015 Monitoring for Region 2

Greetings! DWD Regulatory Oversight and Compliance is scheduled to conduct annual on-site monitoring activities on the dates specified below at various offices affiliated with WorkOne operations for Region 2. The date, time and location for the entrance conference are noted below, and all regional staff planning to interact with the monitoring team on-site is encouraged to participate in the entrance conference.

On-site Monitoring: April 4-8, 2016
Entrance Conference: Monday, April 4, 2016 at 12:00 p.m. EST
South Bend WorkOne office located at 851 S. Marietta St., South Bend, IN 46601
Documentation Due: Monday, March 21, 2016

On-site internet access and private workspace for the monitoring team will be needed. Upon receipt of this announcement, please e-mail me at twbrown@dwd.in.gov the name and contact information of the individual within your organization who will serve as the coordinator for the monitoring visit.

The two (2) documents attached to this announcement should be completed by appropriate regional personnel and returned electronically by the due date specified above.

1. PY2015 Monitoring Documentation Checklist
2. PY2015 Internal Control Matrix

Please note the following:

- (a) Any federally-funded program where DWD is the grantee is subject to monitoring, and the monitoring team may visit any facility and may speak with any management, staff or customers associated with WorkOne services or operations within the region.
- (b) If a monitoring schedule adjustment is required to accommodate an unforeseen issue (e.g., adverse weather), the DWD Monitoring Team will coordinate with the designated regional monitoring coordinator.
- (c) While the typical monitoring period begins July 01, 2015 and includes the current program year PY2015, some items pre-dating this period may be requested for examination.
- (d) Client files and required eligibility documentation will be examined via TrackOne and select paper client files may be also examined on-site.
- (e) ALL requested documentation must be submitted electronically via e-mail or Dropbox to oversight@dwd.in.gov or via flash drive delivered to DWD Regulatory Oversight and Compliance, Attn:

Thomas W. Brown, 10 N Senate Avenue, SE308, Indianapolis, IN 46204. Documentation must be properly titled and organized to be accepted.

- (f) Only documentation specifically requested on the attached "PY2015 Monitoring Documentation Checklist" should be initially submitted (i.e., a list of all active RFPs and *not* the entire file for each RFP). Samples will be requested for further examination. All physical files and supporting documentation/detail, however, should be accessible and available if on-site examination is warranted.
- (g) Additional documentation may be requested for examination if further clarification is warranted. Additional documentation must be submitted as specified in Item (e) above. Failure to provide any requested items within the requested timeframe may be noted as a compliance issue in the Monitoring Report.

Best regards,

Thomas W. Brown
Supervisor | Regulatory Oversight and Compliance
IN Dept of Workforce Development
10 N Senate Ave SE308, Indianapolis, IN 46204
twbrown@dwd.in.gov | 317.233.4187 office | 317.695.6282 cell

PY2015 DWD MONITORING DOCUMENTATION CHECKLIST

Please provide the following documentation by the date specified on the Monitoring Announcement Letter. Documentation must be submitted electronically via email or Dropbox to oversight@dwd.in.gov or via flash drive delivered to DWD Regulatory Oversight & Compliance, Attn: Thomas W. Brown, 10 N Senate Avenue, SE308, Indianapolis, IN 46204. Documentation must be properly titled and organized to be accepted.

1. Contracts, Leases & Memoranda of Understanding (MOUs)

- (a) Spreadsheet of all contracts and agreements active during PY2015, including columns for:
 - Activity/service (e.g., youth service provider, fiscal agent, MIS, housekeeping, marketing, consultant, etc.)
 - Term (beginning and ending dates)
 - Total costs
 - Payment terms (cost reimbursement vs. fixed unit price)
- (b) Copy of each executed contract or agreement
- (c) Spreadsheet of all property leases, held by the Workforce Development Board (WDB) or Service Provider (SP) and paid with WIOA funding, active during PY2015, including columns for:
 - Office designation/type (e.g., WDB office, WorkOne, WorkOne Express, Business Outreach, etc.)
 - Lease holder name
 - Monthly or annual cost
 - Term (beginning and ending dates)
- (d) Copy of each executed property lease
- (e) List of all MOUs active during PY2015 (as applicable)
- (f) Copy of each executed (i.e., with signatures) MOU

2. Equal Opportunity (EO)

- (a) EO complaint logs (i.e., DWD Customer Service Record (State Form 46001)) for most recent four (4) quarters (official forms would be marked "none" in quarters with no activity)
- (b) EO policy and grievance/complaint procedures document

3. Financial Documents

- (a) A-133 Single Audit (most recent)
- (b) Accounting policies/procedures document
- (c) Accrued Expenditure Reports (AERs) for each month in PY2015
- (d) Bank accounts and signatories
- (e) Bank reconciliations for each month in PY2015 (including all supporting bank statements with check copies front and back, ledgers, etc.)
- (f) Chart of Funds and Chart of Accounts
- (g) Cost Allocation Plan
- (h) Credit Card/Charge Account Statements (*without* supporting payment detail) for each month in PY2015
 - *PLEASE NOTE: Only the statements themselves should be submitted initially and *not* the supporting documentation/detail; additional supporting documentation/detail (e.g., approved purchase orders, itemized receipts, cost comparisons, meeting agendas, attendee lists, etc.) will be requested later for only the sample selected for further examination*
- (i) General Ledger(s) sorted by fund number for all PY2015 deposits and payments for all federally-funded programs where DWD is the grantee
 - *PLEASE NOTE: Supporting documentation/detail for disbursements (e.g., voucher or paper check copies showing authorized signature(s), signed purchase orders or payment approval document(s) showing proper authorization for payment, itemized invoices, cost comparisons, relevant written justification, etc.) will be requested later for only the sample selected for further examination*
- (j) Internal Control Matrix (form attached to monitoring announcement letter)
- (k) Spreadsheet showing all Pre-paid Assets
- (l) Trial Balances for each month in PY2015

4. Inventory/Asset Management

- (a) Most recent inventory report
- (b) Inventory/Property Management policy/procedures document

5. OJT

- (a) Employer list
- (b) Customer contract list
- (c) OJT/Training Provider policy/procedures document

PY15



INDIANA
WORKFORCE
DEVELOPMENT

Indiana Department of Workforce Development
Oversight Division

Office Review

Workforce Innovation and Opportunity Act

OFFICE:

DATE(S):

MONITOR(S):

J	Confidential Information and Document Security	Yes	N/A	No	Relevant Policy
J-1	Identifying information, including SSN's, addresses, dates of birth, employer account numbers, and Federal Identification Numbers are safeguarded.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-46
J-2	Reasonable efforts are made to prevent confidential records from being obtained or misused for any unauthorized purpose.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-46
J-3	When a desk or work area (including printers, copiers, and fax machines) is left unoccupied, confidential and/or privileged information is not left unattended.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-45
J-4	Employees are not permitted to take State of Indiana electronic or paper records off work premises to be utilized for personal reasons.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-45
J-5	Social Security Numbers are not disclosed to unauthorized persons or entities.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-46
J-6	When employees are not working directly with confidential documents, these documents are filed or stored in drawers/cabinets to prevent inadvertent disclosure of information.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-45
J-7	Employees only access confidential information to the extent they have permission or authority to access.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-45
J-8	Employees do not leave voicemail messages that contain Social Security Numbers.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-46
Comments:					

K	Document Destruction	Yes	N/A	No	Relevant Policy
K-1	If document destruction services are procured, there is a written agreement to adhere to the standards of Policy 2007-16 between the Regional Operator and the document destruction company providing the service.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-42
K-2	Documents are destroyed in such a manner as to ensure information contained on the records is unidentifiable.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-42
K-3	Documents are destroyed in a secure location.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-42
K-4	Employee notes and documents containing confidential information such as SSN's, that are not subject to the records retention policy, must be shredded.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-46
K-5	Confidential records are not discarded in trash bins, recycling containers, or other publicly accessible locations.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-42
Comments:					

L	Workplace Safety and Security	Yes	N/A	No	Relevant Policy
L-1	Policy established that prohibits the possession of weapons.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2009-06
L-2	Employee unauthorized use of cameras, including cell phone cameras is prohibited from use on the premises.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-45
L-3	Does office have a written emergency response plan?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
L-4	Does the office have a policy regarding hazardous chemicals?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
L-5	Employees do not share computer passwords with fellow workers.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	IRUA
L-6	Computers are used by employees in compliance with the Information Resources Use Agreement (IRUA) which is a statewide policy intended to improve the state's information security and guide state employees regarding appropriate use. (http://www.in.gov/iot/IRUA.htm)	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	IRUA
L-7	Does the office utilize security cameras? If so, how many cameras are there and are they currently monitored by an alarm company?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
L-8	Does the office utilize on-site security such as a security guard or off-duty police officer?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
Comments:					

M	Employee Notification	Yes	N/A	No	Relevant Policy
M-1	Employees were made aware of ethics rules which prohibit benefiting from, or permitting any other person to benefit from, confidential information as further outlined at http://www.in.gov/ig (Indiana Inspector General's Office.)	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-45
M-2	Employees were made aware that DWD adopted a zero tolerance policy for employees who fraudulently file for unemployment benefits or public relief while currently employed at DWD.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-39
M-3	Employees were made aware that, when injured, State Form #34401 must be completed and sent to HR immediately	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-40
M-4	Employees were made aware of tort claim procedures involving non-employees for accidents/injury to person/property.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2007-40
M-5	Employees were made aware of procedures in responding and reporting customer incidents involving workplace violence and possible actions if such conduct occurs.	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2009-06
Comments:					

N	EO Compliance & WorkOne Appearance	Yes	N/A	No	Relevant Policy
N-1	Is there EO signage posted in a highly visible area within the WorkOne?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	2008-04
N-2	Is the EO signage formatted for non-english speaking individuals or individuals with visual impairments?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
N-3	Is there ample room for parking for both WorkOne employees and clientele?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
N-4	Is the WorkOne building itself in an acceptable functional condition?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
N-5	Are the grounds of the WorkOne facility in good condition and free from excessive trash or clutter?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
N-6	If any flags are publicly displayed (<i>Indiana State or The United States</i>) are they in acceptable enough condition for public presentation?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
N-7	Is the WorkOne sign easily seen from the road and is there easy access to the facility?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
N-8	Does the office possess sufficient amount of computers for public access?	<input type="checkbox"/> Yes	<input type="checkbox"/> N/A	<input type="checkbox"/> No	Administrative Inquiry
Comments:					

SECTION 2: TESTING PROCEDURES & REFERENCES
 The following testing procedures and resources, as well as pertinent documentation gathered from the WDB, will be used by DWD Regulatory Oversight and Compliance monitors when performing annual desk reviews and on-site visits to evaluate the WDB's compliance with federal, state and local guidelines and determine whether objectives are met.

FISCAL - PY15

Category 1: Financial Management and Control

DWD Regulatory Oversight and Compliance (ROC) monitors will evaluate the WDB's capacity to perform the financial management functions required by federal, state and local guidelines when operating federal and state funded workforce development grants and ensure proper safeguards are in place to protect grant assets. Monitors will focus on financial management systems that relate to budgets, cash management, program income, cost allocation, allowable costs, internal controls and financial reporting.

WDB Region:	
Monitoring Location:	
Local Participants:	
DWD Monitors:	
Monitoring Date(s):	

Objective/Source(s)	Statement/Test	Verification Questions	Notes
<p>A) Budget Controls: The WDB has a method for tracking planned expenditures that allows it to compare actual expenditures or outlays to planned or estimated expenditures.</p> <ul style="list-style-type: none"> • 29 CFR 95.21(b)(4) - Comparison of outlays with budget amounts for each award. • 2 CFR 200.302(b)(5) - Financial management. 	<p>1) The WDB has an approved budget that is compared to actual expenditures on a regular basis (i.e., quarterly) to determine if it needs to modify its budget.</p>	<p>a) How does the WDB review planned vs. actual expenditures?</p> <p>a1) What frequency? (monthly/quarterly/other)?</p> <p>b) What procedures are in place to handle large variances in program budgets or spending?</p> <p>b1) Is a modification warranted?</p> <p>b2) How are investigations conducted to determine the reason for any variance?</p> <p>c) How are management/administration staff informed of planned vs. actual status?</p>	

FY 15

Objective/Source(s)	Statement/Test	Verification Questions	Notes
<p>B) Cash Management: The WDB's cash draws are necessary and reasonable, and the timing and amount of such draws appear to be as close as possible to the actual disbursement of grant funds for the payment of allowable and allocable costs incurred by the grant.</p> <ul style="list-style-type: none"> • 29 CFR 95.21(b)(3) - Effective control over and accountability for all funds, property and other assets. • 29 CFR 95.22 - Payment. • 2 CFR 200.305(b) - Payment. • OMB Circular A-122 - Cost Principles for Non-Profit Organizations. • 2 CFR 230, App B, (8)(m) - Selected Items of Cost/Support of salaries and wages. 	<p>1) The WDB has a mechanism in place, including policies and procedures, to minimize the time between the transfer of funds from DWD and disbursement of funds to pay allowable costs. The WDB draws cash as close to the time of making disbursements as possible.</p> <p>2) The WDB has mechanisms in place, including policies and procedures, to ensure accountability over other cash related activities.</p>	<p>a) How often does the WDB draw down cash and how does it determine when and how much cash to draw down?</p> <p>b) Does the WDB follow its own policies and procedures on cash management?</p> <p>c) Are bank statements reconciled with the official books of account (e.g., Fundware) each month?</p> <p>d) Do bank reconciliation procedures provide for:</p> <p>d1) Accounting for all check numbers used?</p> <p>d2) Identifying outstanding checks?</p> <p>d3) Investigating all checks outstanding 60 days or more?</p> <p>d4) Voiding outstanding checks after a reasonable period of time?</p> <p>e) When are payments received from contractors/vendors deposited?</p> <p>f) Describe payroll processing and the payroll contractor, if applicable.</p> <p>g) Are payrolls based on actual after-the-fact activity reports (i.e., timesheets) which are certified by employees and reviewed/approved by management?</p> <p>h) Are payrolls based on project allocation reports (i.e., timesheets) which are certified by employees and reviewed/approved by management?</p>	

Objective/Source(s)	Statement/Test	Verification Questions	Notes
E) Internal Controls: Effective control, integrity, and accountability are maintained for all grant cash, personal property, and other grant assets. • 29 CFR 95.21(b)(3) - Effective control over and accountability for all funds, property and other assets. • 2 CFR 200.303 - Internal controls.	1) WDB has adequate safeguards for all grant property and ensures that it is used solely for authorized purposes; has mechanisms in place to prevent unauthorized purchases and disbursements of grant funds; and safeguards its cash and other assets so no one person controls the order, receipt, payment, and reconciliation of an asset.	a) Describe how duties are adequately separated to ensure a single individual is not requesting, authorizing and issuing payments or checks.	
		b) Describe the financial transaction authorization process.	
		c) Describe how assets, equipment and property are safeguarded.	
		d) Describe budgetary controls.	
		e) Describe the security in place for IT systems.	
		f) Describe the journal entry and approval process.	
		g) Describe the internal control process and how weaknesses are determined and minimized.	

Category 2: Administrative Control			
Program and grant management systems support grant functions or activities necessary for operation of a project but are not related to the direct provision of services. These grant functions include personnel, administrative and oversight, management information, and reporting systems. Functions not incorporated in Financial Management Systems are included in this section. In addition, activities are included when their purpose is to ensure compliance with applicable statutory, regulatory and grant requirements common to all ETA grants.			
Objective/Source(s)	Statement/Test	Verification Questions	Notes
H) Subrecipient Monitoring: The WDB is responsible for oversight of the operations of the federal award supported activities. The WDB must monitor activities under federal awards to assure compliance with applicable Federal requirements and performance expectations are being achieved. • 2 CFR 200.330 - Subrecipient and contractor determinations. • 2 CFR 200.331 - Requirements for pass-through entities.	1) The WDB maintains policies and procedures for core management functions and program operations. 2) Written monitoring tools and procedures are used to monitor all elements of the grant Statement of Work (SOW) against performance objectives and compliance with uniform administrative requirements.	a) Describe the WDB's subrecipient monitoring process.	
		b) Does the WDB monitor its subrecipient(s) on at least an annual basis?	
		c) Does the WDB issue written monitoring reports to its subrecipients?	
		d) How soon after subrecipient monitoring are reports issued?	
		e) How are subrecipient monitoring findings resolved?	
I) Record Retention: Record retention practices must comply with applicable federal laws and regulations. • 2 CFR 200.333 - Retention requirements for records.	1) The WDB maintains and follows record retention policies that meet the requirements of applicable federal laws and regulations.	a) Describe the WDB's record retention policies and practices.	

Objective/Source(s)	Statement/Test	Verification Questions	Notes
<p>K) Procurement: All procurement actions are conducted in a manner that provides for full and open competition.</p> <ul style="list-style-type: none"> • 29 CFR 95.40-48 - Procurement Standards. • 2 CFR 200.317 - Procurements by states. • 2 CFR 200.326 - Contract provisions. 	<p>1) The WDB follows their own procurement procedures which reflect applicable state and local laws and regulations, provided that their procurements conform to applicable federal laws and standards.</p> <p>2) The WDB maintains a system for the administration of contracts, including appropriate contract or sub-recipient clauses.</p>	<p>a) Describe the WDB's procurement activities and processes, and how it ensures full and open competition.</p>	
		<p>b) Describe how procurement activities are separated so there is no conflict of interest.</p>	

PY 2015 – 2016 WIOA MONITOR TRIPS

<u>DATE</u>	<u>REGION</u>	<u>ENTRANCE CONF</u>	<u>ON-SITE</u>
SEPT 14-18	REG 11	NOON (11:00AM THEIR TIME)	(CROWE)
OCT 5-9	REG 8	10:30 AM	(CROWE)
OCT 26-30	REG 7	10:30 AM	(CROWE)
NOV 16-20	REG 9	10:30 AM	(CROWE)
DEC 7-11	REG 10	NOON	(CROWE)
JAN 11-15, 2016	REG 12	9:30 AM	
FEB 1-5	REG 5	10:00 AM	
FEB 22-26	REG 4	11:00 AM	
MARCH 14-18	REG 6	11:00 AM	
APRIL 4-8	REG 2	NOON	
APRIL 25-29	REG 3	NOON	
MAY 16-20	REG 1	NOON (11 AM THEIR TIME)	

The team will consist of Bruce Hall, Carmen Upchurch, Jennifer Biddle, and supervisor Thomas Brown.

PY'15



INDIANA
WORKFORCE
DEVELOPMENT
AND ITS **WorkOne** CENTERS

**COMPREHENSIVE MONITORING REPORT
PROGRAM YEAR 2015**

REGION 5

Region 5 Workforce Board, Inc.
c/o Interlocal Association
836 South State Street
Greenfield, IN 46140

On-Site Visit:	February 1-5, 2016
Monitoring Period:	July 2015 - January 2016
Monitoring Team:	Thomas Brown (Supervisor), Carmen Upchurch, Jennifer Biddle, Bruce Hall

I. REPORT STRUCTURE

The Indiana Department of Workforce Development (DWD) Regulatory Oversight and Compliance Division (ROC Division) conducts monitoring of each Local Workforce Service Area (LWSA or Region) to examine compliance with statutory and regulatory requirements and identify areas in need of administrative, financial management, and/or programmatic improvement. This Comprehensive Monitoring Report (Report) includes program review summaries, compliance findings, qualitative observations, technical assistance and guidance provided during the review period, and may also discuss any notable new initiatives or best practices.

Workforce Innovation and Opportunity Act (WIOA) findings, observations, and areas subject to review, for purposes of this Report, are explained below:

Findings. Items identified as non-compliant with WIOA, federal regulations, or state/DWD policies and procedures shall be classified as findings. ROC Division staff will provide citations from WIOA, federal regulations, or state/DWD policies and procedures to identify specific areas of non-compliance and will explain the corrective measures necessary for resolution.

Observations. Items that may or may not be compliance-based, but may impede effectiveness and efficiency of services to individual and business customers shall be classified as observations. ROC Division staff may offer suggestions or guidance to assist the LWSA in making qualitative improvements,

or may make a referral for further technical assistance by appropriate DWD staff. New, unique, significant, or innovative programmatic efforts and results, and/or any practices that are noteworthy or exemplary will be discussed as observations.

Areas Subject to Review. Workforce Development Board (WDB), regional operations, and service provision information, systems, policy, procedures, and documents at all management and service levels are subject to review under, but not limited to, three major subject areas (Review Areas):

1. **Administrative & Financial Management.** This area includes, but is not limited to, an evaluation of the LWSA's Workforce Development Board (WDB) and subcommittees, the WorkOne system, administrative and financial policies and practices, and subrecipient monitoring and oversight according to applicable federal and state legislation, regulations, policies and guidance, and OMB Circulars and Uniform Guidance. ROC Division staff conduct this evaluation via document review and sample selection.
2. **Workforce Development Programs.** This area includes, but is not limited to, an evaluation of the LWSA's programs and services to eligible participants pursuant to WIOA requirements and related federal and state legislation, regulations, policies and guidance, and OMB Circulars and Uniform Guidance. At least ten random, computer-selected participant files are examined per program (Adult, Dislocated Worker, and Youth) for proper maintenance and content, inclusion of pertinent forms and data, appropriate and adequate case notes to ensure continuity from time of application through completion of services, as well as verification that all relevant data has been entered into the case management system (currently TrackOne). On-site visits to various WorkOne centers within the LWSA and interviews with regional management, staff and clientele are conducted to observe operations (e.g., security, building function, appearance, convenience to customers, safety concerns, etc.) and gain insight into the WorkOne environment, processes and procedures, and overall customer service efforts and effects.

This area also includes a review of any additional DWD-administered grants and programs active within the LWSA during the monitoring period. ROC Division staff, during their overall review, correspond with applicable grant and program management staff to obtain progress and status updates for inclusion in this Report.

3. **Performance.** This area includes, but is not limited to, a snapshot of information regarding how the LWSA has performed against applicable performance requirements. For this Report, data reviewed covers July 1, 2014 - June 30, 2015 (PY2014), when the Workforce Investment Act (WIA) was still in effect. Thus, due to availability of performance data at the time of review, analysis within this section is based upon WIA's performance requirements.

Base WIA performance requirements consisted of three core indicators applied to programs serving Adults and Dislocated Workers, and three core indicators applied to programs serving Youth (collectively, the "Common Measures"). States could negotiate with the United States Department of Labor (USDOL) to establish specific levels of performance or "goals" for each measure. Within a state, each LWSA's actual performance had to be within 80 percent of the state's "goal" per measure to avoid sanctions. This comparison of "actual" against "goal" determined whether performance requirements were met.

ROC Division staff evaluate this area by reviewing Indiana's data based on negotiated goals to

provide a "performance snapshot" within this Report.

II. REGIONAL SUMMARY

Counties:	Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Morgan, Shelby
Grant Recipient:	Region 5 Workforce Board, Inc.
Fiscal Agent:	Interlocal Association
Administrative Entity:	Interlocal Association
Prior Monitoring:	One compliance finding was satisfactorily resolved, and there were no questioned costs during last review

Region 5 Workforce Board, Inc. is the grant recipient and client services are provided by Interlocal Association and JobSource (Adult, Dislocated Worker, and Youth). The seven WorkOne offices within this eight county LWSA include:

- Boone County / Lebanon (Express)
- Hamilton County / Fishers (Express)
- Hancock County / Greenfield (Express)
- Hendricks County / Plainfield (Full-Service)
- Johnson County / Franklin (Full-Service)
- Madison County / Anderson (Full-Service)
- Shelby County / Shelbyville (Express)

On-site monitoring was conducted in February 2015 by DWD's ROC Division at the Region 5 Workforce Board, Inc./Interlocal Association headquarters office located in Greenfield, and various WorkOne Centers within the LWSA. An entrance conference was held at the WDB headquarters in Greenfield, with the Region's Executive Team attending. WorkOne offices reviewed included Anderson, Greenfield, Lebanon, and Plainfield. A summary of potential findings and observations was provided in person to the Associate Director at the end of on-site monitoring, with further discussions occurring via email.

DWD ROC staff noted a significant restructuring of the case management team in the Anderson WorkOne office since the PY2014 monitoring visit. Eight of the 13 JobSource staff dedicated to providing case management services appear to be new to the team. Although a potential risk to operations may exist given the number of departed tenured staff and the restructuring, ROC staff did not identify any specific operational deficiencies during this visit.

Region 5's PY2015 WIOA allocation (WIB-5-05) is \$1,654,724.

Other grants active within the LWSA during PY2015 include:

- BC-5-05
- DEIDC-4-05
- NEGDWT-3-05
- SPDWG-5-05 510-SPDWD-05
- WIAIN-4-05
- WIB-4-05
- WIN-5-05

III. ANALYSIS

Information within this section summarizes the ROC Division's overall evaluation of the LWSA relative to the Review Areas described herein.

1. Administrative & Financial Management

Review Summary:

Specific items examined included contracts, property leases, Memoranda of Understanding (MOUs), Equal Opportunity (EO) complaint logs, audits, various policies and procedures, cash draws, accrued expenditures, general ledgers, trial balances, bank reconciliations, disbursements, internal controls, asset management, On-the-Job Training (OJT) records, procurement records, staffing and payroll records, subrecipient monitoring documentation and practices, and WDB records, agendas and meeting minutes.

Compliance Findings:

There were no areas of noncompliance identified within the scope of this review.

Qualitative Observations:

Observation #1: Exercising Discretion to Delay Implementation of Procurement Standards

OMB Uniform Guidance permits WDBs to delay implementation of the revised procurement standards for two fiscal years beginning after December 26, 2014 (i.e., July 1, 2017) as long as the decision is documented in the WDB's procurement policies.¹ The WDB is encouraged to ensure such verbiage exists within its procurement policy.

2. Workforce Development Programs

Review Summary:

Ten Adult, ten Dislocated Worker, and ten Youth computer-generated, randomly selected participant files were examined by DWD ROC Division staff. Monitoring staff also visited various WorkOne centers within the LWSA, observed operations first-hand, conducted interviews with various WorkOne management, staff and clients, and gained insight on the WorkOne environment, processes and procedures, and overall customer service efforts and effects.

Compliance Findings:

There were no areas of noncompliance identified within the scope of this review.

¹ 2 CFR Part 200.110.

Qualitative Observations:

Observation #1: Noteworthy Efforts for Out-of-School Youth Recruitment

WIOA requires that a minimum of 75 percent of Youth funds be spent on out-of-school participants, a significant change from the 30 percent minimum mandated in previous workforce legislation. The new spending level must be fully implemented by the end of PY2016. Region 5 is currently working on achieving that percentage in its spending. To increase the number of out-of-school Youth clients, the Region is utilizing a strategy that has worked well in past years for the recruitment of younger Youth. Current participants are paid an incentive for referring new clients. The payment is made only when the new client successfully completes the enrollment process. Additionally, enrollments of WIOA-funded in-school participants have been significantly reduced, and other funding sources are being used for this population. Additionally, the Region is strengthening and expanding its relationships with local adult education entities.

Observation #2: Noteworthy Efforts toward Youth "Literacy and Numeracy Gains"

The State's WIA Youth "Literacy and Numeracy Gains" goal for PY2014 was 60.0 percent. Statewide performance for this period was 45.1 percent, which is 75 percent of the goal, and Region 5's performance for this period was 43.3 percent, or 72 percent of the goal. Region 5 determined one primary factor possibly impacting in its lower the expected performance was having too few participants return for re-testing after training, and the likely reason was waiting too long after training to re-engage those participants and call them back into the office for re-testing. The management team has implemented a procedure change and now brings participants back into the office for re-testing immediately after training. The Region anticipates this new strategy will maximize client participation in re-testing and improve performance results.

Programmatic Technical Assistance:

WIOA Youth. The DWD Strategic Initiatives unit provided statewide guidance and technical assistance for the WIOA Youth program, and Region 5's Youth staff participated in all of these meetings and training opportunities. The statewide Jobs for America's Graduates (JAG) meeting in July 2015 brought together JAG specialists, coordinators, and regional managers and provided opportunities for training, networking, and the exchange of best practices. An all-day WIOA Out-of-School Youth training workshop for Youth case managers statewide occurred on January 12, 2016, and quarterly meetings continue to be held for JAG managers, WIOA Youth directors, and Youth specialists.

Other Programs:

Trade Adjustment Assistance (TAA). TAA provides training, income support, job search, and relocation assistance to workers dislocated by foreign competition. TAA has its own dedicated funding stream and is administered and monitored by the DWD Dislocated Worker Unit (DWU). The TAA Act requires DWD monitoring of four LWSAs each year, with additional monitoring periodically conducted by USDOL Region 5. TAA services are available in each LWSA's full-service WorkOne centers.

Veterans Services. Veterans Services include career counseling, referral to employment, assessment, and supportive services to qualifying military veterans and qualifying eligible spouses. Services targeted to the unique needs of disabled veterans are also available. The program is funded by Jobs for Veterans State Grant (JVSG) and USDOL Veterans, and is administered and monitored by DWD State Veteran staff. Additional monitoring is conducted by the USDOL Veterans office, located at DWD. Veterans have Priority of Service for any service offered through the WorkOne system.

3. Performance

ROC Division staff extracted data from Indiana's PY2014 WIA Quarterly Summary Report (ETA-9090) to analyze Region 5's performance against Indiana's negotiated goals found at http://doleta.gov/performance/goals/st_neg_perf_level.cfm. The tables on the following page provide a snapshot of the LWSA's actual performance during PY2014.

THE REMAINDER OF THIS PAGE IS INTENTIONALLY BLANK

TABLE A "Common Measures: USDOL Negotiated State Goal vs. Region Actual vs. State Actual"		<i>Negotiated State GOAL</i>	<i>Region 5 ACTUAL</i>	<i>State ACTUAL</i>
Entered Employment Rates (% of Exiters) (10/01/2013 - 09/30/2014)	Adults	62.00%	74.65%	73.10%
	Dislocated Workers	69.00%	82.45%	76.50%
Employment Retention Rates (04/01/2013 - 03/31/2014)	Adults	83.00%	84.35%	85.90%
	Dislocated Workers	88.00%	89.89%	89.00%
Average Earnings (04/01/2013 - 03/31/2014)	Adults	\$13,000	\$12,765.72	\$13,279
	Dislocated Workers	\$15,000	\$17,016.45	\$15,603
Placement in Employment or Education (10/01/2013 - 09/30/2014)	Youth (14-21)	66.00%	72.47%	71.60%
Attainment of Degree or Certificate (10/01/2013 - 09/30/2014)	Youth (14-21)	62.00%	67.38%	67.30%
Literacy and Numeracy Gains (07/01/2014 - 06/30/2015)	Youth (14-21)	43.00%	43.31%	45.10%

TABLE A provides Indiana's goal compared against Indiana's and the LWSA's actual performance at the end of PY2014 for each common measure. Each LWSA needed to achieve at least 80 percent of each goal. Region 5 exceeded two of the three goals for WIA Adults, exceeded all three goals for WIA Dislocated Workers, and exceeded all three goals for WIA Youth. The Region was within the acceptable 80 percent range for the remaining WIA Adult goal.

TABLE B Cumulative 4-Quarter Performance		<i>Region 5 ACTUAL</i>	<i>State ACTUAL</i>
Total Served (07/01/2014 - 06/30/2015)	Adults	13,075	166,799
	Dislocated Workers	1261	7,112
	Total Youth	667	5,675
Total Exited (04/01/2014 - 03/31/2015)	Adults	11,949	153,881
	Dislocated Workers	943	4,689
	Total Youth	343	2,946

TABLE B provides cumulative 4-Quarter performance. Specifically, this is the total number of WIA participants served and the total number of WIA participants exited in Region 5 during PY2014.

IV. COMPREHENSIVE MONITORING SUMMARY

This Report summarizes WIOA compliance findings and observations that resulted from the DWD ROC Division's monitoring of Region 5 for the time period July 2015 - January 2016, as well as performance data analysis per WIA Common Measures for PY ending June 30, 2015. Information provided herein represents our best efforts to analyze the financial and programmatic status of WIOA-funded programs active within the LWSA. The results contained in this Report are believed to be true and accurate based on the samples tested, files reviewed, and staff and individuals interviewed.

Certified By: _____
*Thomas W. Brown, Supervisor
Regulatory Oversight & Compliance*

April 8, 2016
Date

Approved By: _____
*Connie Berry, Counsel/Director
Regulatory Oversight & Compliance*

April 8, 2016
Date

ELEMENT 8

COMPLAINT PROCESSING PROCEDURES



INDIANA
WORKFORCE
DEVELOPMENT
AND ITS **WorkOne** CENTERS

ELEMENT 8: Complaint Processing Procedures

[29 CFR Part 38.70 through 38.79]

DWD Policy 2007-10 entitled, “Grievance/Complaint Procedures Policy” ensures that Indiana WorkOne full-service centers and express sites implement procedures that are in compliance with guidelines provided by USDOL regarding the nondiscrimination and equal opportunity provisions of WIOA.

The DWD grievance policy integrates grievance and complaint processes for the WorkOne programs funded through DWD, inclusive of the Complaint Processing Procedure requirements of 29 CFR 38.70 through 38.79.

Each of the twelve regions are responsible for ensuring complaint processing procedures are made available and followed. The regions provide the name, title, telephone number, and TDD/TTY number of the Local EO Officer who is the first responder to a complaint.

Initial Review

Applicants, registrants, eligible applicants/registrants, participants, employees and applicants for employment are notified of their right to the complaint process by way of posters and notices in the WorkOne offices with the prescribed language from 29 CFR Part 38. The “Equal Opportunity is the Law” notice communicates that any person who believes that she/he, or any specific class of individuals, has been or is being subjected to discrimination prohibited by WIOA, may file a written complaint within 180 days of the alleged discrimination.

Recipients use State Form 45153 (R3/6-16) entitled, “Record of Complaint Information” for complaint processing. All complaint forms are inclusive of the information required for filing a complaint of discrimination under 29 CFR Part 38.73. The “Record of Complaint Information” form must contain the complainant’s name and address, the identity of the respondent, and a description of the complainant’s allegations. The complainant or the complainant’s authorized representative must sign the “Record of Complaint Information” form.

Notice of Receipt

Pursuant to DWD Policy 2007-10 entitled, “Grievance/Complaint Procedures Policy,” the recipient must provide for initial written notice to the complainant acknowledging that the recipient has received the complaint. Additionally, the recipient must inform the complainant that they have the right to representation. The notice of receipt should provide a written statement to the complainant containing the issues raised in the complaint and for each issue, a statement whether the recipient will accept the issue for investigation or reject the issue. The written notice must include the reason for rejection.

Notice of Lack of Jurisdiction

If the recipient does not have jurisdiction of the complaint, or if the complainant did not file a written complaint within 180 days, a written “Notice of Lack of Jurisdiction,” including the reason for the determination, will be sent to the complainant. Also, a notice of the

complainant's right to file with the U.S. Department of Labor/Civil Rights Center (DOL/CRC) within 30 days of the complainant's receipt of notice will be provided.

Alternative Dispute Resolution

The DWD Grievance Policy provides the complainant with the option to choose the Alternative Dispute Resolution (ADR) process or for the local-level to do an investigation of the complaint. The decision to elect ADR or for the local-level to do an investigation solely rests with the complainant. Should an agreement reached under ADR be breached, the non-breaching party may file directly with the DOL/CRC within 30 days of the date on which the non-breaching party learns of the alleged breach. If the parties are unable to reach an agreement through ADR, the complainant may file directly with DOL/CRC.

Fact-finding

All regions have local autonomy for processing complaints of discrimination within a 90-day period. The 90 days allows for a period of fact-finding or investigation of the circumstances underlying the complaint. The remaining time permitted under the regulatory 90-day requirement allows DWD's State EO Officer an adequate period for review should the complainant be dissatisfied with the local decision.

Notice of Final Action

The Local EO Officer must submit a "Notice of Final Action" to the complainant within 60 days of the date on which the complaint was filed. The Notice of Final Action informs the complainant of the ruling for the issue(s) raised in the initial complaint and an explanation of each decision, or a description of the way the parties resolved the issue the notice also advises the complainant of the person's right to appeal the local-level decision. The Notice of Final Action informs the complainant that they can appeal to the State within five days of receipt of the local decision. The State EO Officer issues a written final decision within the remaining 30 days. The State EO Officer advises the complainant of their right to file with the DOL/CRC within 30 days of receipt of the State's written Notice of Final Action if dissatisfied with the decision.

The DWD Grievance Policy notifies the recipient that should she/he fail to provide the complainant with a Notice of Final Action, the complainant may file a complaint with DOL/CRC within 30 days of the expiration of the 90-day period. To summarize, the complainant would need to file with DOL/CRC within 30 days of receipt of the State's written Notice of Final Action if dissatisfied with the decision.

Record Maintenance

All complaint records, including logs, are retained for 3 years after resolution of the complaint. Recipients are advised to notify the State EO Officer of any administrative enforcement actions and lawsuits brought against them that allege discrimination on one or more of the bases prohibited by WIOA Section 188.

State Form 46001 (R3/4-16) entitled, "Customer Service Record" lists complaints received by each region and is submitted to the State EO Officer on a quarterly basis. The record includes that name and address of the complainant, the basis for the complaint, a description of the complaint, the date the complaint was filed, the disposition and date of disposition of the

complaint, and other pertinent information.

Non Discrimination Complaints

When a complaint is not based on discrimination but on program or customer service issue, the complaint is processed in accordance with local policies and procedures as described in DWD Policy 2007-10.

Migrant Seasonal Farm Workers

The State Monitor Advocate (SMA) receives information regarding complaints in an aggregate form and uses the Services to Migrant and Seasonal Farmworkers Report, Employment and Training Administration Form 5148, on a quarterly basis for submission to USDOL.

METHODS OF ADMINISTRATION

Element 8 Documentation

No policies, documents or supporting samples have been added to this section. Previously provided.

ELEMENT 9

CORRECTIVE ACTIONS/SANCTIONS



INDIANA
WORKFORCE
DEVELOPMENT
AND ITS **WorkOne** CENTERS

ELEMENT 9: Corrective Actions/Sanctions

[29 CFR Part 38.76 through 38.79]

DWD Policy 2002-34 entitled, “Sanctions Policy” provides the State’s approach and guidance concerning those instances when sanctions and corrective actions may need to be implemented.

DWD intends to be fully supportive of the local delivery systems. Toward that end, sanctions will be considered as a last resort. Technical assistance, clarification, and reasonable corrective action opportunities will be offered first. There may be instances where technical assistance would not be appropriate and where progressive action may begin without technical assistance. There may also be instances where a violation has not yet occurred, but the grantee will be notified of the potential problem so that corrective action may be taken on the recipient’s own volition.

In the rare case that a sanction or corrective action is called for, the notification of a sanction shall be received by the parties involved at least ten (10) working days before the scheduled imposition of sanctions, as evidenced by certified mail. The letter will restate the violation, the corrective action needed, and the appeal process. If satisfactory evidence of the needed corrective action set in place is presented to DWD within this ten (10) working day period, DWD may postpone the implementation of the sanction. The sanction can be postponed until the completion of the corrective action within the DWD approved timelines. In this case, the implementation of the sanctions may be lifted. However, if the state deadline is reached without completion of the action, the sanction will be imposed.

METHODS OF ADMINISTRATION

Element 9 Documentation

No policies, documents or supporting samples have been added to this section. Previously provided.