

WIOA Titles I and III Comprehensive Programmatic Review Guide



Michigan
Talent Investment Agency
Department of Talent and Economic Development

WIOA Programmatic Guide Preface

BACKGROUND

On July 22, 2014, the Workforce Innovation and Opportunity Act (WIOA) was signed into law by President Barack Obama. With its enactment, the United States Department of Labor (USDOL) Employment and Training Administration (ETA) has a renewed opportunity to articulate its vision for a demand-driven public workforce development system, redefine the interactions between USDOL and its Federal partners and modernize service delivery through the alignment and integration of programs and data systems.

The WDA has developed this guide to ensure the utmost alignment with the USDOL review processes.

The purpose of this guide is to 1) assess grantee risk of non-compliance with WIOA provisions that are currently in place, 2) identify areas at risk of non-compliance, and 3) provide technical assistance (TA) that strengthens demonstrated areas of weakness, identify opportunities to highlight innovation, and 4) note promising practices for other Michigan Works! Agencies.

HOW THE GUIDE IS ORGANIZED

The guide outlines key *areas of focus* to serve as the lens with which we assess the workforce development system of each local area. Those focus areas are: governance, one-stop operations and Wagner-Peyser, work-based learning, and youth. Each focus area represents both the greatest risk and the greatest opportunity for success of workforce programming.

Focus areas are further broken down into *core components*. Core components are modules within a collective that define the focus area. They represent the requirements or expectations outlined in the statute for each of the focus areas. Each core component has a *summary of indicators*. Table 1 provides a summary of the indicators that will be used in this guide. Indicators are intended to frame the reviewer's comments concerning local area compliance with the core component.

<i>Summary of Indicators</i>	
Compliant	
	Administrative recommendation identified
	No administrative recommendation identified
Non-compliant	
	Corrective action plan received
	No corrective action plan received

Table 1

This Guide focuses, primarily, on programmatic issues. Issues involving fiscal and administrative matters will be covered by the Workforce Development Agency's Office of Audit and Financial Compliance.

A written report will summarize review topics and identify findings, administrative recommendations, and positive practices resulting from the programmatic review.

USE OF THE GUIDE

Programmatic monitoring will happen annually for each MWA. It is understood that MWAs will differ in practice to some extent in specific areas. While some compliance matters are defined by date, many functions are multi-year and do not have a specific timetable. While using this guide, always consider the goals of a program review are three-fold:

1. to determine whether an MWA is compliant with WIOA provisions;
2. to identify the need for and provide technical assistance; and
3. to record examples of noted promising practices that can be shared.

Each core component comes with guidance for determining whether the indicator is present and will often contain sources of information you may wish to review. This guidance can be supplemented with other methods for documenting the existence of an indicator. Questions are listed below the guidance that you might use to begin your assessment of whether the indicator is present. These questions are provided as a means to begin your research. You may use the questions, expand upon their use or employ other means of assessing the grantee's compliance.

Use of WDA monitoring guides by WDA Coordinators is required, although WDA staff is encouraged to modify and enhance guides as needed to meet the specific needs of each review. In addition, WDA monitoring guides are living documents that will be updated regularly to reflect changes in law, regulation, and/or policy, as well as to include any improvements which will make the guides easier and more effective to use.

Table of Contents

Entrance Conference

Expenditures, Mandates, and Limitations Snapshot

Focus 1: Governance

- Core Component 1.1: Local Area Governance
- Core Component 1.2: Local Policy Development
- Core Component 1.3: Memoranda of Understanding
- Core Component 1.4: Monitoring and Oversight
- Core Component 1.5: Sector Strategies and Industry Partnership

Focus 2: One-Stop Operations

- Core Component 2.1: One-Stop Certification and Service Delivery Design
- Core Component 2.2: Accessibility
- Core Component 2.3: Wagner-Peyser

Focus 3: Work-Based Learning:

- Core Component 3.1: Transitional Jobs
- Core Component 3.2: Incumbent Worker Training
- Core Component 3.3: Apprenticeship
- Core Component 3.4: Other Alternatives
- Core Component 3.5: Eligible Training Providers

Focus 4: Youth

- Core Component 4.1: Local WDBs and Training Providers
- Core Component 4.2: Use of funds for Youth Workforce Investment Activities

Exit Conference

ENTRANCE CONFERENCE

MWA:	Date:
Location:	Time:

WDA Staff Present:	
MWA Staff Present:	
WDA Questions/Comments:	
MWA Questions/Comments:	

EXPENDITURES, MANDATES, AND LIMITATIONS SNAPSHOT

ADULT FUNDING	Expended %	Incumbent Worker Training % (20% Max)	Transitional Jobs % (10% Max)	Are percentages satisfactory?
AY____ Qtr.____				
AY____ Qtr.____				

DISLOCATED WORKER FUNDING	Expended %	Incumbent Worker Training % (20% Max)	Transitional Jobs % (10% Max)	Are percentages satisfactory?
AY____ Qtr.____				
AY____ Qtr.____				

YOUTH FUNDING	Expended %	OSY % AY17 Target Rate:____ AY18: 50% Min	Work Exp. % (20% Min)	Requires Additional Assistance Barrier (5% Max)	Low Income Exception (5% Max)	Are percentages satisfactory?
AY____ Qtr.____						
AY____ Qtr.____						

Program Expenditures, Mandates, and Limitations	Comment
If percentages above are noncompliant, please describe plan of action being taken to reach compliance.	

Focus 1

Local Area Governance

Focus 1 addresses design and governance principles that guide and support the improvement of job and career options for our nation’s workers and jobseekers through integrated, job-driven public workforce system that links diverse talent to businesses. It supports the development of strong, vibrant regional economies where businesses thrive and people want to live and work.

This revitalized workforce system will be characterized by three critical hallmarks of excellence:

- ✓ The needs of business and workers drive workforce solutions;
- ✓ One-Stop Centers, also referred to as American Job Centers (AJCs), provide excellent customer service to jobseekers and employers and focus on continuous improvement; and
- ✓ The workforce system supports strong regional economies and plays an active role in community and workforce development.”¹

Core Component 1.1: Local Area Governance			
Check Applicable Indicator			
Compliant		Non-compliant	
<input type="checkbox"/>	Administrative recommendation identified	<input type="checkbox"/>	Corrective action plan received
<input type="checkbox"/>	No administrative recommendation identified	<input type="checkbox"/>	No corrective action plan received

Citation: WIOA Section 107(e), (f) and (h) LWDBs	Comment
1.1.1- Is there a policy that ensures the local board meets the transparency requirements established by the Sunshine Provision to provide the following information: (1) local plan prior to submission; (2) membership; (3) the designation and certification of one-stop operators; (4) the award of grants or contracts to eligible providers of youth workforce investment activities; and upon request (5) minutes of formal local board meetings.	
1.1.2- If the LWDB hires, or plans to hire staff, is there a formal policy or procedure that established objective personnel qualifications for the director position that ensures that the individual selected has the requisite knowledge, skills, and abilities, to meet identified benchmarks and to assist in effectively carrying out the functions of the local board?	
1.1.3- Does the LWDB have a conflict of interest policy that meets the requirements that board members not:	

¹ Training and Employment Guidance Letter (TEGL) No. 19-14 Vision for the Workforce System and Initial Implementation of the Workforce Innovation and Opportunity Act p. 2

<p>(1) vote on a matter under consideration by the local board regarding the provision of services by such member or by an entity that such member represents</p> <p>(2) provide direct financial benefit to such member or the immediate family of such member; or</p> <p>(3) engage in any other activity determined by the Governor to constitute a conflict of interest as specified in the state plan.</p>	
---	--

Citation: WIOA Section 107(d)(1) Local Plan	Comment
1.1.4- Has the local plan been submitted and reviewed?	
1.1.5- Is the plan approved without conditions?	
1.1.6- If the plan is not approved, please identify deficiencies.	
1.1.7- If the plan is not approved, please identify status at the time of review.	

Citation: WIOA Section 107(d)(3) Leveraging	Comment
1.1.8- Has the LWDB identified non-federal resources to leverage support for workforce development activities in its local area? If so, please provide examples.	

Citation: WIOA Section 107(d)(5) Career Pathways	Comment
1.1.9- Ideally, a career pathway approach connects progressive levels of education, training, support services, and credentials for specific occupations in a way that optimizes the progress and success of individuals with varying levels of abilities and needs. Please discuss the local career pathways development strategy.	

Citation: WIOA Section 107(d)(10) Operator/Provider Selection	Comment
1.1.10- Has the LWDB identified eligible providers of training services in the local area?	
1.1.11- Does the one-stop operator directly provide career services?	
1.1.12- If not, has the LWDB identified eligible providers of career services in the local area?	

Citation: WIOA Section 107(d)(11) Coordination w/ Education Prov.	Comment
1.1.13- Please discuss how the MWA coordinates with education providers.	
1.1.14- What are your challenges?	
1.1.15- Do you believe you have robust relationships? If yes, please discuss.	

Citation: WIOA Section 107(d)(13) Accessibility	Comment
1.1.16 Does the LWDB annually assess the physical and programmatic accessibility of all one-stop centers in accordance with the applicable provisions of the Americans with Disabilities Act of 1990 and WIOA Section 188? How does it do so?	

Core Component 1.2: Policy Development

Check Applicable Indicator

Compliant		Non-compliant	
	Administrative recommendation identified		Corrective action plan received
	No administrative recommendation identified		No corrective action plan received

Citation: WIOA Manual Section 1.7

1.2.1- Please identify whether the MWA has developed each of the following policies, including whether each is a stand-alone policy or included in the Local Plan.

Please Note: These policies must be made available upon request, but are otherwise not required to be submitted to WDA at the time of review.

Policy	Yes	No	Stand-alone	Plan
Local self-sufficiency policy				
Local Rapid Response policy. (§ 682.310, § 682.330, § 682.340)				
Local On-the-Job Training (OJT) policy				
Local nepotism/conflict of interest policy				
Local determination of whether an individual “employed for a duration sufficient to demonstrate an attachment to the workforce” policy (for dislocated worker eligibility)				
Local priority of service policy				
Local supportive services policy				
Local needs-related payments policy				
Local policy for follow-up services that includes the appropriate follow-up services and when to provide follow-up services				
Local incumbent worker training policy				
Local lay-off aversion policy (may be combined with the local incumbent worker training policy). (§ 682.320)				
Local selective service policy (policy for potential participants who are males 26 years old or older that failed to register with the Selective Service)				
Local policy for determining knowingly and willfully failing to register for Selective Service (may be included with the local Selective Service policy)				
Local WIOA Youth five percent income exception allowance policy (if allowable)				
Local WIOA Youth definition of “requires additional assistance.” (§ 681.300)				

Local WIOA Youth definition of “other responsible adult,” (if allowable per the local board, the MWA may define “other responsible adult” in their local policy in order to enroll minors with the authorization of individuals other than a parent or legal guardian)				
Local WIOA Youth definition of “a youth who is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society.” (§ 681.290)				
Local WIOA Youth incentive policy				
Local strategy for providing work-based training policy				
Local customized training policy				
Local grievance policy				
Local Equal Opportunity policy				
Local internal controls policy disallowing manipulation of data for performance or reporting benefit				
Local policy that provides criteria for the MWA’s approval of schools under both initial and continued eligibility to be placed on the Michigan Training Connect (MiTC)				

Core Component 1.3: Memoranda of Understanding (MOU) and Infrastructure Funding Agreements (IFAs)			
<i>Check Applicable Indicator</i>			
Compliant		Non-compliant	
<input type="checkbox"/>	Administrative recommendation identified	<input type="checkbox"/>	Corrective action plan received
<input type="checkbox"/>	No administrative recommendation identified	<input type="checkbox"/>	No corrective action plan received

Citation: WIOA Section 121(b)(1 and 2) Required/Additional Partners	Comment
1.3.1- Has guidance been disseminated from the local boards about how partnering will occur at the one-stop?	

Citation: WIOA Section 121(a)(1) MOUs and IFAs	Comment
1.3.2- Are all required MOUs in place and signed?	
1.3.3- If not, which MOUs are outstanding, and what is the estimated date of completion?	
1.3.4- Are additional MOUs in place from any non-mandated partners?	
1.3.5- Are all required IFAs in place and signed?	
1.3.6- If not, which IFAs are outstanding, and what is the estimated date of completion?	
1.3.7- Are additional IFAs in place from any non-mandated partners?	

Core Component 1.4: Monitoring and Oversight

Check Applicable Indicator

Compliant		Non-compliant	
<input type="checkbox"/>	Administrative recommendation identified	<input type="checkbox"/>	Corrective action plan received
<input type="checkbox"/>	No administrative recommendation identified	<input type="checkbox"/>	No corrective action plan received

Citation: WIOA Section 102(b)(2)(E)(v), Section 134(a)(2)(B)(iv) & Section 184(a)(4) Annual Monitoring	Comment
1.4.1- Does the LWDB have a self-imposed monitoring schedule?	
1.4.2- Has the LWDB conducted, or will the LWDB conduct, monitoring this PY?	
1.4.3- Does the LWDB have a monitoring tool? If so, please share.	

Core Component 1.5: Sector Strategies and Industry Partnerships

Check Applicable Indicator

Compliant		Non-compliant	
<input type="checkbox"/>	Administrative recommendation identified	<input type="checkbox"/>	Corrective action plan received
<input type="checkbox"/>	No administrative recommendation identified	<input type="checkbox"/>	No corrective action plan received

Citation: WIOA Section 3(23)(B) In-Demand Industry Sectors	Comment
1.5.1- Which tools, if any, in addition to Michigan Labor Market Information provided by DTMB, does the LWDB use to determine if an industry sector or occupation is “in-demand”?	

Citation: WIOA Section 108(b)(4)(B) Initiatives	Comment
1.5.2- Please describe the local industry or sector strategies initiative.	

Citation: WIOA Section 134(c)(1)(v)	Comment
1.5.3- Please describe the MWA’s industry and/or sector partnerships.	
1.5.4- Please identify industries/sectors which you feel you have a strong partnership with.	
1.5.5- Do you face challenges partnering with a particular industry/sector? If so, please identify.	

Focus 2

One Stop Operations

Focus 2 reinforces that, “One-stop centers provide jobseekers, including individuals with barriers to employment, such as individuals with disabilities, with the skills and credentials necessary to secure and advance in employment with family-sustaining wages. Additionally, AJCs enable employers to easily identify and hire skilled workers and access other supports, including education and training for their current workforce. Further, rigorous evaluations support continuous improvement of AJCs by identifying which strategies work better for different populations.”²

“The One-Stop Center network and partner programs are organized to provide high-quality services to individuals and employers. State and local boards, One-Stop Center operators and partners must increase coordination of programs and resources to support a comprehensive system that seamlessly provides integrated services that are accessible to all jobseekers, workers and businesses.”³

Core Component 2.1: One Stop Certification and Service Delivery Design			
<i>Check Applicable Indicator</i>			
Compliant		Non-compliant	
<input type="checkbox"/>	Administrative recommendation identified	<input type="checkbox"/>	Corrective action plan received
<input type="checkbox"/>	No administrative recommendation identified	<input type="checkbox"/>	No corrective action plan received

Citation: WIOA Section 121(d)(4) Additional Requirements	Comment
2.1.1- How does the local board ensure one-stop operators do not create disincentives to providing services to individuals with barriers to employment that may require longer-term services, such as intensive employment, training and education services?	

Citation: WIOA Section 121(e)(1, 2 & 3) One-Stop Delivery System	Comment
2.1.2- Does the local one-stop delivery system in each local area provide: <ul style="list-style-type: none"> (1) The full array of career services in accordance with section 134(c)(3)(G); (2) Access to training services in accordance with sections 134(c)(3) and 134(c)(G)(3); (3) Access to programs and activities carried out by one-stop partners in accordance with section 134(d), if any; and (4) Access to data/analysis described in 15(a) of the Wagner-Peyser Act and all information that would aid in job search, 	

² TEGL 19-14, p.2

³ TEGL 19-14, p. 3

placement, recruitment and other labor exchange activities authorized under the Wagner-Peyser Act.	
2.1.3- Are these services provided in one or more centers within each local area?	
2.1.4- Are there affiliate sites (satellite offices) that provide one or more of these services? If so, how many?	
2.1.5- Are there specialized centers that address specific needs (examples: youth, industry sector/cluster)?	

Citation: WIOA Section 134(c)(1)(A)(iv) Relationships	Comment
2.1.6- How has the local area established relationships and networks with both small and large employers in the local area?	

Citation: WIOA Section 134(c)(2) Career Services	Y/N	Direct	Contract
2.1.7- At a minimum does the one-stop delivery system provide adults and dislocated workers the following:			
(1) eligibility determination			
(2) outreach, intake and orientation, including worker profiling			
(3) initial assessment of skill levels (literacy, numeracy, language proficiency)			
(4) labor exchange activities (job search, placement, recruitment and business services etc.)			
(5) referrals to and coordination with other programs and services			
(6) labor market information			
(7) performance and program cost information of ETPs			
(8) local area performance information			
(9) information about supportive services or assistance and referral to other programs, such as SNAP and TANF			
(10) assistance regarding the filing of UI claims			
(11) assistance with establishing eligibility for financial aid assistance for education and training programs not funded under WIOA			
(12) comprehensive/specialized assessments (examples:			
(13) diagnostic testing or in-depth interviewing) to identify barriers and appropriate employment goals			
(14) individual employment plan (IEP) development			
(15) group counseling			
(16) individual counseling			
(17) career planning			
(18) short-term pre-vocational services			
(19) internship and work experiences linked to careers			
(20) workforce preparation activities			
(21) financial literacy services			
(22) out-of-area job search assistance/relocation assistance			
(23) English language acquisition and integrated education and training programs			

(24) 12 months of follow-up services for participants placed in unsubsidized employment, as appropriate			
---	--	--	--

Citation: WIOA 134(c)(3) Training Services	Comment
2.1.8- How do case managers determine that an adult or dislocated worker is eligible for training?	
2.1.9- How does the MWA document the need for training services in the participant's file?	
2.1.10- What procedures are in place to ensure that participants select training programs that are directly linked to employment opportunities, especially those in-demand, in the local area or planning region?	
2.1.11- Is priority of service used to determine which participants enter training?	
2.1.12- Has the local area created a policy or procedure to specify the timeframe in which a previous assessment done by a one-stop operator or partner can be used to determine necessity of training?	
2.1.13- How does the local area ensure that participants who enter training services are unable to obtain other grant assistance for such services (example: Federal Pell grants)?	
2.1.14- Does the local area take into account the full cost of training participation when determining its ability to fund training services (dependent care, transportation etc.)?	
2.1.15- Does the local area have a training cap?	
2.1.16- If so, what is the cap?	
2.1.17- What types of training are offered?	
2.1.18- Is customized training offered with employer commitment to hire the participant upon training completion?	

Citation: WIOA Section 134(c)(3)(G)(ii) Training Contracts	Comment
2.1.19- Under what circumstances does the local area authorize a contract for training services in lieu of an individual training account (ITA)?	

Citation: WIOA Section 134(d)(1) Permissible activities	Yes	No
2.1.20- Does the local area provide any of the following permissible activities:		
(1) customized screening and referral of qualified participants to employers;		
(2) customized employer-related services to employers, employer associations, or other such organizations on a fee-for-service basis;		
(3) pay-for-performance strategy for training services (no more than 10% of funds can go toward this);		
(4) customer support that enables individuals with barriers to employment and veterans to navigate among multiple services/activities for such populations;		
(5) technical assistance for one-stop operators and ETPs (examples: provision of services to individuals with disabilities, coordination of services across providers and programs etc.);		
(6) activities in coordination with child support enforcement, SNAP/SNAP extension programs and those that facilitate remote access to services provided through the one-stop delivery system;		

(7) activities that coordinate workforce and economic development initiatives in the local area, that promote entrepreneurial skills training/microenterprise services, that improve linkages between the workforce investment system and employers and linkages with UI programs;		
(8) training programs to displaced homemakers and individuals training for nontraditional occupations		
(9) business services and strategies;		
(10) activities to adjust the economic self-sufficiency standards for the local area;		
(11) improved coordination between employment and training programs carried out in the local area for individuals with disabilities; or		
(12) promising services to workers and businesses (example: support for education, training, skills upgrading and statewide networking for employees to become workplace learning advisors)		

Citation: WIOA Section 134(d)(2 & 3) Supportive Services and Needs Related Payments (NRPs)	Comment
2.1.21- Does the local supportive services policy ensure that supportive services are provided only to those participants who are unable to receive such services through other programs?	
2.1.22- Is there a supportive services cap?	
2.1.23- If so, what is the cap?	
2.1.24- How are participants informed about the availability of supportive services?	
2.1.25- Does the local area offer NRPs to qualifying Adults and DWs?	
2.1.26- If so, how does the local area verify that the participant does not/no longer qualifies for unemployment compensation?	

Core Component 2.2: Accessibility			
<i>Check Applicable Indicator</i>			
Compliant		Non-compliant	
<input type="checkbox"/>	Administrative recommendation identified	<input type="checkbox"/>	Corrective action plan received
<input type="checkbox"/>	No administrative recommendation identified	<input type="checkbox"/>	No corrective action plan received

Citation: WIOA Section 2(1) Purposes of the Act	Comment
2.2.1- What actions has the LWDB and local boards taken to expand accessibility of services to individuals with barriers?	
2.2.2- How has the LWDB collaborated with education partners to increase accessibility to competitive integrated employment for individuals with disabilities?	

Citation: WIOA Section 101(d)(7)(D) Technological Improvements	Comment
2.2.3- How does the local area use technology to maximize customer accessibility to services?	
2.2.4- Please provide a brief overview of other accommodations are made for individuals with barriers? (examples: restructuring of the way	

aid/benefits/training is provided, modified work or training schedules, acquisition of devices, modification of training materials)	
---	--

Citation: WIOA Section 181(c) and 29 CFR 38.31 Grievance Procedures	Comment
2.2.5- Has the LWDB established procedures for grievances or complaints alleging violations of nondiscrimination and equal opportunity provisions (which include a hearing and completion within 60 days of the complaint)?	
2.2.6- How does the LWDB inform customers about the complaint filing process?	

Core Component 2.3: Wagner-Peyser			
<i>Check Applicable Indicator</i>			
Compliant		Non-compliant	
<input type="checkbox"/>	Administrative recommendation identified	<input type="checkbox"/>	Corrective action plan received
<input type="checkbox"/>	No administrative recommendation identified	<input type="checkbox"/>	No corrective action plan received

Citation: Employment Services Manual, Chapter 4, Section 4:1	Comment
What services are delivered as:	
1. Self Services	
2. Facilitated Services	
3. Staff-assisted Services	

Citation: 5 Code of CFR 900.603 and 900.604, Sections 4728 and 4763 of the Federal Intergovernmental Personnel Act of 1970, and Employment Services Manual, Chapter 1, Section 1:3	Comment
2.3.1- All service-delivery staff, funded with Wagner-Peyser 7(a), must be merit-based. Are the staff delivering employment services merit-based employees?	
2.3.2- If so, what documentation does your organization have confirming this federal regulation?	

Technical Assistance Question	Comment
2.3.3- Explain how a customer is served when they enter the Service Center. What is the flow through the Center for customers to be served?	

Citation: Employment Services Manual, Chapter 4, Section 4:3	Comment
2.3.4- What is the process for administering the Unemployment Insurance (UI) Work Test?	

Citation: Policy Issuance 17-18, and change 1	Comment
2.3.5- What is the procedure for providing services to RESEA participants?	

Citation: Policy Issuance 15-31 and changes 1-5; Policy Issuance 16-19, and changes 1-3 and Policy Issuance 18-07	Comment
2.3.6- What is the procedure for providing Work-Based Training opportunities to RESEA participants, long term unemployed individuals, returning citizens, PATH participants, and FAE&T participants?	

Focus 3

Work Based Learning

Focus 3 emphasizes WIOA’s vision of “informed consumer choice, job-driven training, provider performance and continuous improvement. The quality and selection of providers and programs of training services, including Registered Apprenticeship programs and others, is vital to achieving these core principles.”⁴

Core Component 3.1: Transitional Jobs			
<i>Check Applicable Indicator</i>			
Compliant		Non-compliant	
<input type="checkbox"/>	Administrative recommendation identified	<input type="checkbox"/>	Corrective action plan received
<input type="checkbox"/>	No administrative recommendation identified	<input type="checkbox"/>	No corrective action plan received

Citation: WIOA Section 134(d)(5) Transitional Jobs	Comment
3.1.1- Does the LWDB have a service delivery design and/or operational plan for transitional jobs?	
3.1.2- Does the local area have policies and procedures in place (programmatic and fiscal) to adhere to the transitional jobs 10 percent limitation?	

Core Component 3.2: Incumbent Worker Training			
<i>Check Applicable Indicator</i>			
Compliant		Non-compliant	
<input type="checkbox"/>	Administrative recommendation identified	<input type="checkbox"/>	Corrective action plan received
<input type="checkbox"/>	No administrative recommendation identified	<input type="checkbox"/>	No corrective action plan received

Citation: WIOA 134(d)(4) Incumbent Worker Training (IWT)	Comment
3.2.1- What percentage of funding has the LWDB reserved and used for IWT? <i>(Please note: 20 percent is the maximum allowed for the Federal share of the training costs for incumbent workers)</i>	

⁴ Training and Guidance Letter 41-14, Workforce Innovation and Opportunity Act Title I Training Provider Eligibility Transition, p. 2

3.2.2- What factors are the LWDBs using to determine eligibility for employer IWT programs? Is there a policy in place?	
3.2.3- Are the IWT programs supported by Federal funds designed for the purpose of assisting such workers in obtaining the skills necessary to retain employment or avert layoffs?	

Citation: WIOA 134(d)(4)(C) and (D) Non-Federal Share	Comment
3.2.4- Has the LWDB established the non-Federal share portion of the employer's payment for IWT? Is there a policy in place?	
3.2.5- Is there a local area or regional priority to provide incumbent worker training to support in-demand industries?	

Core Component 3.3: Apprenticeship			
<i>Check Applicable Indicator</i>			
Compliant		Non-compliant	
<input type="checkbox"/>	Administrative recommendation identified	<input type="checkbox"/>	Corrective action plan received
<input type="checkbox"/>	No administrative recommendation identified	<input type="checkbox"/>	No corrective action plan received

Citation: WIOA Section 134(d)(1)(A)(ix)(II)(bb) Bus. Svc. Strategies	Comment
3.3.1- Does the LWDB engage in business services and strategies through the development and delivery of apprenticeship programs?	
3.3.2- If yes, are any of these programs in new industries/occupations or otherwise innovative fields? Please describe.	

Core Component 3.4: Other Alternatives			
<i>Check Applicable Indicator</i>			
Compliant		Non-compliant	
<input type="checkbox"/>	Administrative recommendation identified	<input type="checkbox"/>	Corrective action plan received
<input type="checkbox"/>	No administrative recommendation identified	<input type="checkbox"/>	No corrective action plan received

Citation: WIOA Section 3(44) On-the-Job Training (OJT)	Comment
3.4.1- Does the OJT contract detail the knowledge or skills essential to the full performance of the job?	
3.4.2- Is the participant's work experience and existing knowledge and skills considered when developing an OJT contract between a participant and an employer?	
3.4.3- What assessment tools are used to gauge a participant's knowledge of an occupation and the gap in the participant's skills to make the OJT necessary?	
3.4.4- How do you ensure the length of the OJT is appropriate to the occupation for which the participant is trained?	
3.4.5- How are OJT candidates identified?	

Citation: WIOA Section 181 Requirements and Restrictions (a)(1)(A) see also FLSA Sec. 6(a)(1)	Comment
3.4.6- Does the OJT compensate the individual at the same rate, including periodic increases, as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills?	
Citation: WIOA Section 181(b)(2, 3 and 5) Labor Standards	Comment
3.4.7- Do OJT contracts explicitly ensure that employees are not displaced or partially displaced (reduction in hours) by the OJT contract?	
3.4.8- How does the local area ensure that the employer has not experienced recent layoffs?	
3.4.9- Do current company employees have the same advancement opportunities as the OJT participant?	
3.4.10- Are benefits and working conditions at the same level and to the same extent as other trainees or employees working a similar length of time and doing the same type of work?	
Citation: WIOA Section 181(d)(2) Prohibition Based on Relocation	Comment
3.4.11- How is it confirmed that the company's hiring location been operating and employing workers for longer than 120 days?	
Citation: WIOA Section 194(4) General Program Requirements for OJT Contracts	Comment
3.4.12- Are past OJT contracts accessible and retained long enough to verify that OJT opportunities are not developed with employers that continuously failed to provide long-term employment with equal benefits and wages to non-OJTs?	
3.4.13- Does staff follow up with participants who retain employment after the OJT? If so, for how long?	
TA Questions: Customized Training	Comment
3.4.14- Has customized training been developed by industries within the region?	
3.4.15- If yes, what types of industries use this method to develop their workforce?	
3.4.16- How is curriculum developed?	
3.4.17- How are participants selected for a customized training program?	
3.4.18- In the case that the customized training is created by an industry, who sets the qualifying standards for entry into the training, employers or industry?	
3.4.19- If so, does the local policy contain a methodology for determining the employer's share of training costs?	
3.4.20- How often is customized training utilized within the local area?	
TA Questions: Internships	Comment
3.4.21- Does the LWDB utilize internships in its service delivery design?	

3.4.22- How are internship opportunities created?	
3.4.23- Do internships generally have a mentoring component?	
3.4.24- Are internships structured with learning objectives within an established timeframe?	
3.4.25- How is the intern's work evaluated?	
3.4.26- Are case managers provided progress reports?	
3.4.27- How does the local area ensure that an intern is not displacing existing employees?	
3.4.28- Has the local area offered any paid internships?	

Core Component 3.5: Eligible Training Providers

Check Applicable Indicator

Compliant		Non-compliant	
<input type="checkbox"/>	Administrative recommendation identified	<input type="checkbox"/>	Corrective action plan received
<input type="checkbox"/>	No administrative recommendation identified	<input type="checkbox"/>	No corrective action plan received

Citation: WIOA Section 122(b)(1)(F) and (G) Ind.-Rec. Credentials	Comment
3.5.1- What special considerations are given to ETPs that provide industry-recognized credentials?	

Citation: WIOA Section 122(b)(1)(I) Barriers	Comment
3.5.2- How is the ability of the provider to provide training services to individuals who are employed or have barriers to employment evaluated and taken into consideration?	

Focus 4

Youth

Focus 4 outlines WIOA's, "broader youth vision that supports an integrated service delivery system and provides a framework through which states and local areas can leverage other Federal, state, local, and philanthropic resources to support In-School Youth (ISY) and Out-of-School Youth (OSY). WIOA affirms the Department's commitment to providing high-quality services for all youth and young adults, beginning with:

- ✓ Career exploration and guidance;
- ✓ Continued support for educational attainment;
- ✓ Opportunities for skills training in in-demand industries and occupations, such as pre-apprenticeships or internships; and
- ✓ Culminating with a good job along a career pathway, enrollment in post-secondary education, or a Registered Apprenticeship."⁵

Core Component 4.1: Local WDBs and Youth Providers			
<i>Check Applicable Indicator</i>			
Compliant		Non-compliant	
<input type="checkbox"/>	Administrative recommendation identified	<input type="checkbox"/>	Corrective action plan received
<input type="checkbox"/>	No administrative recommendation identified	<input type="checkbox"/>	No corrective action plan received

Citation: WIOA Section 107(b)(4)(A)(ii) Youth Standing Committees	Comment
4.1.1- Does the LWDB have a youth standing committee in place?	
4.1.2- Has the LWDB established instructions for the role of the Youth Standing Committee?	
4.1.3- If applicable, please provide a list of the youth committee members (TEGL 23-14 and TEGL 8-15).	

Citation: WIOA Section 107(d)(8) Program Oversight	Comment
4.1.4- Has the LWDB designed a monitoring tool to be used for youth program oversight? If so, please provide a copy.	
4.1.5- Does the LWDB have a timeline for conducting oversight of the youth workforce investment activities?	

Citation: WIOA Section 123(a) & (b) Eligible Providers	Comment
4.1.6- Please describe the local process for identifying eligible providers of youth workforce investment activities.	
4.1.7- Is the Youth Standing Committee involved in the selection process?	
4.1.8- Does the guidance/instructions include language that deals with the termination of providers?	

⁵ Training and Employment Guidance Letter (TEGL) No. 23-14 Workforce Innovation and Opportunity Act (WIOA) Youth Program Transition p. 2

4.1.9- Has the local board issued any sole-source contracts?	
4.1.10- What are the criteria for awarding sole-source contracts?	

Core Component 4.2: Use of Funds for Youth Workforce Investment Activities			
<i>Check Applicable Indicator</i>			
Compliant		Non-compliant	
	Administrative recommendation identified		Corrective action plan received
	No administrative recommendation identified		No corrective action plan received

Citation: WIOA Section 129(b)(1)(E) Youth Monitoring and Oversight	Comment
4.2.1- What entity is tasked with the monitoring and oversight of the local Youth program?	
4.2.2- Has the responsible entity created a monitoring tool?	
4.2.3- What elements are being analyzed?	
If a tool has been created, please share.	

Citation: WIOA Section 129(a)(1)(B)(viii) and (C)(vii) Add'l. Assistance	Comment
4.2.4- How does the LWDB define OSY needs additional assistance to enter or complete an educational program or to secure or hold employment? This information is required to be included in the Local Plan.	
4.2.5- How does the LWDB define ISY needs additional assistance to enter or complete an educational program or to secure or hold employment? This information is required to be included in the Local Plan.	
4.2.6- Is the definition the same for both OSY and ISY?	
4.2.7- Is the MWA currently within the 5% limitation for this barrier?	

Citation: WIOA Section 129(a)(4)(A) and TEGL 23-14 OSY Priority	Comment
4.2.8- Does the MWA feel confident that the mandated OSY expenditure minimum percentage rate will be met? If not, please explain.	
4.2.9- Does the local area face challenges identifying OSY to meet the expenditure mandate? If so, please explain	

Citation: WIOA Section 129(c)(1) Program Design	Comment
4.2.10- Describe the local area's Youth Program design.	
4.2.11- Does the local area have any policies or issuances explaining the program design?	
4.2.12- Is training provided to youth case managers to ensure the local area's service delivery strategy is consistently adhered to?	
4.2.13- Has training been provided to youth case managers to ensure they understand the objective assessment provided to youth?	
4.2.14- Has the local area designed its own objective assessment or combined objective assessment/ISS tool? If so, please provide.	

Citation: WIOA Section 129(c)(1)(B) Service Strategies	Comment
4.2.15- What is the local area's service strategy for youth participants?	
4.2.16- What is the process for ensuring an ISS is provided and linked to youth performance indicators?	
4.2.17- Does the ISS identify career pathways for education or employment?	
4.2.18- Does the ISS include references to the 14 program elements?	

Citation: WIOA Section 129(c)(1)(C)(i-iv) Program Outcomes	Comment
4.2.19- What strategy has the local area identified to ensure youth program activities lead to a High School diploma or its equivalent or a recognized post-secondary credential?	
4.2.20- Please describe the local strategy that prepare youth for post-secondary education and training opportunities.	
4.2.21- How does the youth service delivery strategy create strong linkages between academic instruction and occupational education that lead to attainment of recognized post-secondary credentials?	
4.2.22- How does the MWA prepare youth for unsubsidized employment opportunities?	
4.2.23- Please discuss how the youth program design ensures "effective connections to employers, including small employers, in in-demand industry sectors and occupations of the local and regional labor markets."	
4.2.24- Have local area staff, including case managers, been provided training on LMI products to ensure youth participants are receiving the required in-demand industry/occupation information within the local and regional labor market area?	

Citation: WIOA Section 129(c)(2)(C) Work Experiences	Comment
4.2.25- The Work Experience element includes summer work opportunities, pre-apprenticeships, internships/job shadow, and on-the-job training opportunities. What strategy or process has the local area identified to ensure the availability of these components of this element?	
4.2.26- No less than 20 percent of local funds shall be used to provide ISY/OSY the work experience activities indicated above. What mechanism has the local implemented to track the expenditure of the work experience element? Does the MWA feel confident in consistently meeting this requirement?	
4.2.27- Does the youth program include paid or unpaid work experiences in pre-apprenticeship programs?	
4.2.28- If so, has the local area verified that each pre-apprenticeship program is recognized by and feeds into a Registered Apprenticeship program? <i>* Note: TEN 13-12 defines a quality pre-apprenticeship program</i>	
4.2.29- Please name specific employers who are strong supporters of youth work experiences, including which industries they represent.	

Citation: WIOA Section 129(c)(2) Youth Program Elements	Comment
---	---------

4.2.30- How does the local area ensure provision of the 14 youth program elements?			
4.2.31- Has the LWDB written a policy defining the provision of the 14 program elements?			
4.2.32- Please identify whether the following elements are directly provided or referred:	Direct	Contract	Ref.
(A) tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential;			
(B) alternative secondary school services, or dropout recovery services, as appropriate;			
(C) paid and unpaid work experiences that have as a component academic and occupational education, which may include— (i) summer employment opportunities and other employment opportunities available throughout the school year; (ii) pre-apprenticeship programs; (iii) internships and job shadowing; and (iv) on-the-job training opportunities;			
(D) occupational skill training, which shall include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area involved, if the local board determines that the programs meet the quality criteria described in section 123;			
(E) education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;			
(F) leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate;			
(G) supportive services;			
(H) adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;			
(I) follow-up services for not less than 12 months after the completion of participation, as appropriate;			
(J) comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate;			
(K) financial literacy education;			
(L) entrepreneurial skills training;			
(M) services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and			
(N) activities that help youth prepare for and transition to postsecondary education and training.			

Citation: WIOA Section 129(c)(2)(D) Occupational Skills Training	Comment
4.2.33- Does the youth program's occupational skills training component give "priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area involved?"	

Citation: WIOA Section 129(c)(3)(A) (i & ii) Information/Referrals	Comment
4.2.34- How does the local area ensure that youth program participants are receiving information on the full array of available services, either through the MWA, eligible providers, or one-stop partners?	
4.2.35- Describe the referral process for services such as training/educational programs to serve participants either on sequential or concurrent basis.	

Citation: WIOA Section 129(c)(3)(B) and (C) Additional Requirements	Comment
4.2.36- For those individuals not meeting the eligibility requirements, but needing services, such as further assessment, what process has been established to ensure the participant is served appropriately?	
4.2.37- Please describe how the LWDB ensures that parents, participants, and other members of the community with experience relating to programs for youth are involved in the design and implementation of the WIOA Youth program.	

Citation: WIOA Section 129(c)(7) Linkages	Comment
4.2.38- Describe the local area's strategy to coordinate with local education agencies for optimal service provision.	
4.2.39- The adult education program serves large numbers of out-of-school youth. Are there efforts underway to better coordinate the delivery of services to out-of-school youth between Titles I and II, such as by co-enrolling youth in programs funded by the two titles?	

EXIT CONFERENCE

MWA:	Date:
Location:	

WDA Staff Present:	
MWA Staff Present:	
WDA Comments:	
Potential Findings:	
Potential Administrative Recommendations:	
MWA Comments:	