



To: Indiana's Workforce System

From: Regina Ashley, Associate Chief Operations Officer for Policy
Indiana Department of Workforce Development *RA*

Date: April 17, 2015

Subject: General DWD P-1
Communications Protocol and Announcement of DWD Policy, Information, and
Guidance Manual

Purpose

The indexing system for policies and TABs is being replaced by a DWD Policy, Information, and Guidance Manual. This policy, the first in the new numbering system, outlines the new protocol and format for Department of Workforce Development (DWD) communications to the workforce system.

Rescission

DWD Policy 2006-21, *Indiana Department of Workforce Development's Communications Formation and Dissemination Policy for All Funding Sources Administered by DWD*

References

Not applicable. This is a General DWD policy.

Content

Going forward, DWD will be very clear about what constitutes policy and what communications present options or information.

There have been times in the past when Technical Assistance Bulletins (TABs) have been issued to clarify or expand upon policy and in actuality, are themselves compliance documents. For example, TAB 2012-15, *Minimum Requirements for Informational Handouts*, and TAB 2011-01, *Minimum Requirements for Core Workshop Offerings*, set forth mandates that expand upon Policy 2010-13. Similarly, TAB 2005-001, *Incentive Payments to WIA Participants*, clarifies Policy 2004-17, *Participant Payment Policy*. The effect is that a staff person trying to research participant payment policy would have to be aware that a TAB was issued at some later date and posted in a separate list on the DWD website that provided more mandatory policy on the same subject.

We want to amend past practice to make our guidance more user-friendly and clear about expectations. The guidelines for distinguishing policy and bulletins are:

- **Policy**

- Policies convey mandatory action or compliance. When terms such as “must,” “shall,” or “adhere” appear in a communication, it is policy. DWD central office staff must be very aware that, if they intend for a communication to impart any required action or practice, the communication should be issued as policy and use the “must” and “shall” type verbiage.
- The oversight unit will monitor against policy and cite the policy when a local entity fails to comply.
- Policies remains in effect until rescinded. The only exceptions would be policies that pertain to time limited grants or special initiatives.

- **DWD Bulletins**

- DWD Bulletins provide information, options, or voluntary guidance (e.g., technical assistance that offers helpful suggestions but isn’t a mandate). Bulletins will use words such as “should” and “may.”
- The oversight unit *cannot* monitor against a bulletin. Bulletins are not “cite-able” in monitoring reports.
- Whereas policies are in place until rescinded, bulletins may have short-term application in the field and may have end dates. An example of a bulletin would be funding allocation announcements.

The former practice of issuing and posting separate lists of policies and TABs organized by year of release is being replaced by a DWD Manual that will be organized by statute. There will be a **Federal Section** and a **State Section** that will be tabbed by the statute to which the communication pertains,

and a **General** section for policies (such as this one) that have no specific federal or state statute reference. Thus, this policy is indexed as General DWD P-1. During the transition to the new system, we will keep the current DWD Policy list and DWD TAB lists intact. Many of these will be rescinded as they are revised for WIOA. They will be put into the new indexing format as they are revised. Any that remain after all updating is completed for WIOA implementation will be re-indexed and the former chronological policy and TAB lists will be archived.

Formatting

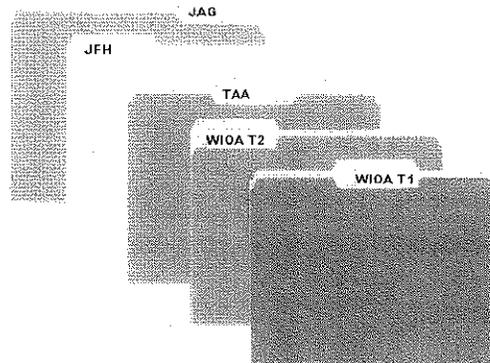
All policies will be formatted as follows:

- **TO:** In the past, the “who” that is included in the “To” line of policies has not been clear. We have not been able to tell who is actually to receive any given communication because a generic *Indiana’s Workforce System* could have represented any number of different combinations of recipients. The options for the “To” line on any communication and the parties represented by each option will be:
 - **Workforce Development Board Chairs** - the chair of each of the current twelve local boards. The Field Operations division will keep names and e-mails for the board chairs current and submit any changes to the policy division. Any formal communication to board chairs will be cc’d to Workforce Development Board Directors.
 - **Workforce Development Board Directors** - the lead staff person for each local board. The Field Operations division will keep names and e-mails for the directors current and submit any changes to the policy division.
 - **WorkOne Operators** - the lead of the competitively procured one-stop operator for each WorkOne. In cases where the board staff has been approved to be the operator, the board’s application to the state will have identified the staff person who acts in the role of operator. The Field Operations division will keep names and e-mails for the operators current and submit any changes to the policy division. Any formal communication to operators will be cc’d to Workforce Development Board Directors and to the DWD Regional Directors.
 - **Local Fiscal Officers** - the chief financial officers for each of the twelve local workforce boards. The Finance division will keep names and e-mails for the financial officers current and submit any changes to the policy division. Any formal communication to financial officers will be cc’d to Workforce Development Board Directors.
 - **Youth Coordinators** – the individuals at the local level responsible for administering youth programs, including JAG. The Strategic Initiatives unit will keep names and e-mails for youth and JAG coordinators current and submit any changes to the policy division.

Any formal communication to Youth Coordinators will be cc'd to the Workforce Development Board Directors.

- **Regional Chief Local Elected Officials (RCEOs)** - the CEO who has been identified in the local elected officials' agreement to be the single point of contact for all the CEOs in each region. The Field Operations division will keep names and e-mails for the RCEOs current and submit any changes to the policy division. Any formal communication to elected officials will be cc'd to Workforce Development Board Directors and Chairs.
 - **State Workforce Innovation Council** - the chair of the SWIC and the DWD staff person identified as the executive director of the SWIC. The executive director will ensure the name and e-mail of the chairperson is kept up-to-date.
 - **Adult Education Consortia** - WIOA Title II adult education grantees. The Adult Education unit will keep names and e-mails for the consortia partners current and submit any changes to the policy division. Any formal communication to adult education consortia will be cc'd to Workforce Development Board Directors and the DWD Regional Coordinators.
 - **DWD Regional Directors** - the staff directors and formal managers for DWD staff in the field. The Field Operations division will keep names and e-mails for the DWD regional coordinators current and submit any changes to the policy division. Any formal communication to DWD Regional Coordinators will be cc'd to Workforce Development Board Directors.
 - **DWD Central Office Leadership** - anyone with DWD Central Office Administration who is at a Director's level or higher. The human resources unit will be responsible for keeping the names and e-mails for central office leadership current.
 - **The Workforce System** - all the above. If any of the above should not receive or don't need to receive the communication, then the groups who will receive it must be listed out.
- **FROM:** Policies will be signed by the Commissioner or the Commissioner's designee.
 - **DATE:** The date the policy is being distributed to the field.
 - **SUBJECT:** The subject line will include a policy or bulletin number that includes two parts:
 1. Part 1. The federal or state statute and title to which the policy applies and the section of the statute (if any) to which the policy applies. For example:

- WIOA T1 (107)
- WIOA T2 (203)
- WIOA T3 (3)
- TAA
- UI
- NEG (a federal grant)
- JFH (Jobs for Hoosiers; this would go in the State Section of the Manual)



Communications will be dropped into the “file folder” for that statute. There will be no separate indexing or folders for regulations, since regulations expand upon or explain a section of statute.

2. Part 2: The policy or bulletin number that applies to that section and the title. For example:

- WIOA T1 (107) - P1 Local Workforce Development Board Certification
- WIOA T1 (107) - P2 Definition of a Unit of General Local Government and Designation of Regional Chief Elected Official and Content of CEO Agreement
- WIOA T1 (107) – P3 Guidance for Workforce Development Board Functions
- WIOA T1 (107) - B1 Voluntary Higher Performing WDB Criteria.

Notice that there are three policies that relate to section 107 of Title I, so they are numbered sequentially. There will at some point be a bulletin that relates to that section 107 regarding a *voluntary* application for high performing board status, so that communication is labeled as B1 – the first bulletin related to section 107.

- **PURPOSE:** Why the policy is being issued.
- **RESCISSION:** Any current policies or bulletins (or TABs, as we phase out TABs) that are made obsolete by the new communication.
- **REFERENCE:** The specific part of the laws, regulations, and/or USDOL communications that provide a basis for the communication. For example, WIOA T1 (107)(c)(1)(B).
- **CONTENT:** the body of the communication.

- **EFFECTIVE DATE:** the date by which impacted recipients will be accountable for adherence to the policy or by which the information in the bulletin becomes applicable.
- **CONTACT FOR QUESTIONS** – Because staff and organizational configurations change, a generic e-mail address is being established that will be monitored by the policy unit. The policy unit will direct the question to the appropriate person(s) in the agency for response. That address is policy@dwd.in.gov
- **ACTION (applies to policies only)**– a description of what impacted recipients are expected to do.

Going forward, a **Policy Clarification** will be issued when the system is being given additional guidance related to a specific policy, and the numbering system will be the original policy number with -01, -02, etc. following it.

DWD Informal Communication

Informal communications are essentially “FYI” documents with no bearing on statutes, practice or procedures. Examples would be announcements about upcoming agency or state government events; sharing of press releases; sharing of RFPs for which local entities may apply; or links to resources. Informal communications may be shared with the field or internally by any staff member and may be communicated via e-mail. They will not be numbered and won’t follow any particular format. They must, however, be cc’d to the policy@dwd.in.gov mailbox so that we know what was communicated to whom and when. This will avoid duplicate communications to the field on the same topic and be a resource to remind us of whether anyone remembered to share interesting information.

We want to ensure that policy and policy clarifications are shared with the field for review and comment before being finalized. The table below outlines the review steps and timelines for moving communications from development to issuance.

Process for Development and Review

Process Flow	Policy or Policy Clarification	Bulletin	Informal Communication
Document development	Any administrative unit		
First internal review	Review and approval by the head of the administrative unit (Policy, Field Operations, UI, CTE, Finance, Strategic Initiatives, or Adult Education); draft then sent to Policy unit for review management.		Not applicable. Skip to Final Issuance Stage.
Second internal review	Policy Unit sends the draft to legal and heads of other administrative units (Field Operations, UI, CTE, Finance, Strategic Initiatives, or Adult Education). Review time: no less than 3 business days and no more than 5.		Not applicable.

Revision based on internal review	Policy Unit coordinates with originator to make any revisions based on internal review.		
Field and Partner Agency Review	Disseminated by the Policy Unit to potentially impacted field entities (e.g., Workforce Board Chairs and Directors, Chief Local Elected Officials, Adult Education Directors, WorkOne Operators, Works Council Chairs, etc) and as applicable, partner agencies (e.g, FSSA/DVR, FSSA/DFR, CHE, DOE, etc) Review time: no less than 1 week and no more than 2 weeks.	Not applicable. Skip to Final Approval stage.	Not applicable.
Final draft	Policy Unit coordinates with originator to make any revisions based on external review and prepares ancillary document for head of originating unit listing comments received and why comments were either accepted or rejected in final policy.	Not applicable. Skip to Final Approval stage.	Not applicable.
Final Approval	Review by the head of the originating administrative unit	Review by the head of the originating administrative unit	Not applicable.
Index assignment	Policy Unit assigns index number.		Not applicable.
Final issuance	Policy Unit creates pdf, and distributes to appropriate audiences.		Originator sends out the information communication.
Posting	Policy Unit sends pdf to Communications Unit to post on the DWD website		Informal communication is cc'd to policy@dwd.in.gov
Retention	Policy unit maintains "tickle list" of review dates for policies and notifies originating unit of need for review every two years. The unit identifies any communications with end dates and on that date, requests the communications unit to change the status on the DWD website to "rescinded" and archive it.		NA

Effective Date

Immediately.

End Date

Until rescinded

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Contact for Questions

policy@dwd.in.gov

Action

DWD Central Office staff members are to comply with this communications protocol going forward.