



State of Rhode Island WIOA PY2022

Narrative Performance Report



Rhode Island made considerable progress increasing the capacity and responsiveness of Rhode Island's workforce development system throughout Program Year 2022. As of September 2023, Rhode Island's unemployment rate is 2.6%, among the lowest since recordkeeping began and the twenty-first straight month of unemployment below 4%. Incomes are up, economic growth is rising; yet significant challenges remain. Specific communities in the state continue to suffer from a history of economic exclusion and inequity. Automation and artificial intelligence have the potential to drastically change the economy and the nature of work; and inflation and the rising cost of living consume a greater portion of Rhode Islanders' paychecks and impact their ability to save and build family wealth. Addressing these challenges requires a responsive and flexible workforce development system that meets the needs of all Rhode Islanders.

From the momentum of previous program years; the state workforce system focused on expanding the reach, reputation, and reliability of the state WIOA system. PY2022 saw the relocation or renovation of two of the state's three American Job Centers to modern facilities with leading-edge amenities. The state board reviewed several state policies and eligibility standards with a focus on broadening eligibility and serving as many needy Rhode Islanders as possible. The State Workforce Agency (the state Department of Labor and Training) launched a statewide WIOA technical assistance initiative that includes a web-based knowledge library for local Title I staff to rely on as a reference. And, consistent with a key priority of the McKee administration, the state WIOA system expanded coordination with programs serving disabled (Vocational Rehabilitation), low-income (TANF), current and former foster youth (the state Department of Children, Youth, and Families) and justice-involved (the state department of Corrections) populations throughout the state.

These new initiatives build upon and leverage the innovations and improvements made in recent program years including the dramatic expansion in the scope, availability, and flexibility of support services available within the WIOA system; the piloting of culturally-competent and community-based affiliate American Job Centers, the integration of the state's industry-led partnership program with state WIOA programs, and the continued expansion of Registered Apprenticeship Programs.

There is critical work remaining to ensure continued economic stability and security for Rhode Island's businesses and our community. And the state workforce development network is prepared to do its part. We look forward to our continued collaboration in responding to the challenges ahead.

- **Progress made in achieving the state’s strategic vision and goals, as described in the state’s Unified or Combined State Plan, for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency.**

Rhode Island’s 2020-2023 WIOA Plan (modified in PY2021) outlines the following goals:

1. Implement a demand-driven, sector-based strategy to meet employer demand and establish a pipeline of skilled workers for future demand.
2. Advance a career pathway strategy to provide employment, education, training, and support services for individuals, particularly those with barriers to employment (including TANF recipients), that will ensure an opportunity to develop their education and skills to prepare them for a job at various points in their life.
3. Align policy and leverage existing government structures and resources so that government is “networked” and coordinated to achieve efficiencies and effectiveness throughout the workforce system.
4. Use data to inform policy-making decisions, guide investments and evaluate performance to measure return on investments

Throughout Program Year 2022 (PY22), the Department of Labor and Training and the state’s three (one state, two local) Workforce Development Boards (WDB) maintained progress in achieving these goals while ably meeting their collective responsibilities under the Workforce Innovation and Opportunity Act.

Rhode Island continued to integrate its employer-led industry sector partnerships with WIOA; connecting sector partners with American Job Centers and WIOA Business Service staff on industry-specific hiring events and sharing feedback and intelligence with job coaches and other WIOA partners. The state also continued to promote innovation in service including providing guidance and technical assistance to frontline WIOA staff regarding the state’s expansion and emphasis on support services, as well as its continued priority to expand the use and availability of Registered Apprenticeship Programs.

Key to meeting the dual goals of meeting employer demand while building career paths for Rhode Island job seekers (particularly those with barriers to employment) is making sure the system is serving as many individual job seekers and business customers as possible; and in a setting that conveys professionalism, confidence, and effectiveness. In PY2022, the State Workforce Development Board conducted a comprehensive review of its Lower Living Standard Income Level guidance and particularly the state definition of ‘economic self-sufficiency’. Under WIOA, occupational training and other services may be made available to employed individuals if, among other criteria, their current employment does not provide for ‘economic self-sufficiency.’ Rhode Island previously set its economic self-sufficiency standard at 100% of the Lower Living Standard Income Level – meaning an unmarried participant without dependents making as little as \$17,499 would be considered ‘economically self-sufficient’ and thus ineligible for occupational training. For comparisons sake; the Rhode Island minimum waged annualized

for a 40-hour work week is \$27,040 (2023); the state threshold for maintaining TANF and SNAP benefits for a family of one is \$26,973 (2023), and the state threshold for home heating assistance for a family of one is \$34,039 (2023). After completing its review and analyzing self-sufficiency thresholds in similar states and local areas; the State Workforce Development Board revised Rhode Island's limit to 175% of the Lower Living Standard Income Level, or \$30,535 (2023). The result will be more low-income Rhode Islanders receiving the opportunity for life- and career-changing occupational training.

Keeping with the theme of inclusivity and broadening access to services within the confines of the WIOA law; the state board also revised its Eligibility and Documentation policy for WIOA programming; balancing flexibility and customer service with compliance and program integrity. Low income and particularly transient populations may be challenged to produce official records and documentation for program eligibility determinations; yet those are the individuals who might benefit most from such programs. The state board revised its eligibility policy to allow for the responsible use of participant attestation to certain eligibility categories. The policy is structured such that self-attestation is to be used as a last resort, but is nonetheless a valid and viable option to demonstrate eligibility.

Perhaps the most significant accomplishment during PY2022 was the relocation and renovation of two of the state's three American Job Center. The Greater Rhode Island local area completed long-overdue maintenance, upgrades, and renovations to its comprehensive American Job Center in West Warwick that resulted in a contemporary office space that is befitting the dedicated WIOA staff and is welcoming and inspiring to WIOA customers. Similarly, the Providence/Cranston local area relocated their comprehensive Job Center to a modern space in one of the capital city's 'up and coming' neighborhoods with plenty of visibility and foot traffic. Shedding the perception of an 'old rundown government' building reflects the larger shift toward an industry-driven, flexible, and effective workforce develop system that can meet the needs of a diverse range of customers.

- **Progress made in implementing sector strategies and career pathways. The discussion may include: business engagement strategies, work-based learning (including apprenticeship), work experiences for youth and adults, transitional jobs, and incumbent worker training strategies and policies in the state**

Sector Strategies

Rhode Island continued to promote and position its industry sector partnership initiative, Real Jobs RI, as the key intermediary between the workforce development network and employers in the state’s largest and growing industries. The program funds industry sector-driven partnerships in Rhode Island’s largest and growing industries including:

- Agriculture
- Commercial Fishing
- Commercial Shell Fishing
- Construction
- Defense & Cybersecurity
- Design
- Energy
- Finance
- Healthcare
- Hospitality
- Information Technology
- Manufacturing
- Marine Trades
- Medical Technology
- Social Enterprise
- Transportation and Logistics

These partnerships identify and define common workforce opportunities and challenges, and connect with workforce, education, and economic development partners to create solutions. These partnerships also function as sophisticated, real-time, workforce intelligence aggregators that work directly with the state workforce network to disseminate actionable intelligence, detail emerging workforce trends, articulate skill requirements, and identify institutional and administrative barriers. The partnerships collaborated with local boards in PY2022, sharing industry intelligence and employer feedback to help better inform program design. Partnerships also communicated industry specific hiring opportunities to American Job Centers.

Career Pathways

A key priority for Rhode Island’s career pathways system throughout PY2022 was increasing the knowledge, capacity, and confidence among frontline WIOA staff. To that end, the State Workforce Agency (Department of Labor and Training) launching an ongoing virtual technical assistance (TA) series to provide a more holistic understanding of the WIOA law, its regulations, and its requirements. Remembering all of the different requirements, expectations, rules, and steps under WIOA can be a complex undertaking. The state’s goal is to help frontline staff and management navigate all these requirements and provide the most effective possible service to customers. The TA series covers some of the more complex elements of WIOA, as well as state-specific priorities and initiatives, and best practices in serving clients. Each presentation, with Questions and Answers, is recorded and posted to a state website to serve as a knowledge library and reference for staff on an ongoing basis. The series began in PY2022 with two

webinars; one covering Maintaining Effective Case Notes and a second on the various ways to Determining Youth Low Income Status. In PY2023 a webinar on recording and reporting Measurable Skills Gain was also held. Additional trainings are planned for each quarter moving forward.

- **If the state has received a small state minimum allotment exception to decrease the minimum out-of-school youth expenditure requirement, describe how the exception has impacted services provided to both in-school youth and out-of-school youth, including specific strategies for serving each population, as well as how the state and/or local area is ensuring serving out-of-school youth remains a priority.**

N/A.

- **The state's performance accountability system, including:**
 - **Any specific state performance measures or goals and progress towards meeting them.**
 - **Any performance deficiencies on the primary indicators of performance, which may include descriptions of any factors impacting performance.**
 - **The state's common exit policy, including which ETA-funded partner programs are included in the state's common exit policy.**
 - **Negotiated performance levels for local areas for titles I and III core programs for program years 2016-2017.**
 - **The state's approach to data validation and ensuring data integrity, including a description of the methodology of any validation activities that occurred.**

State Specific Measures

Rhode Island has not identified any state-specific performance measures at this time.

Performance Deficiencies

The Table on page 8 displays the negotiated goal, actual state performance, and percent of goal attained as reported for Program Year 2022 to the Employment and Training Administration. State performance goals are negotiated with DOL-ETA. A state level percent of goal below 50% of negotiated target is considered a performance failure.

Rhode Island - Statewide	PY 2022 Final		
	Neg Perf Goal	Actual PYTD	% of Goal
Employment (2nd Q after Exit)	Exiters 07/01/21-06/30/22		
Title III - Wagner-Peyser	61.4%	67.50%	109.93%
Adult	80.5%	83.90%	104.22%
DW	82.5%	88.00%	106.67%
Youth	72.0%	75.30%	104.58%
Employment (4th Q after Exit)	Exiters 01/01/21-12/31/21		
Title III - Wagner-Peyser	65.3%	70.30%	107.66%
Adult	78.5%	88.30%	112.48%
DW	83.0%	88.20%	106.27%
Youth	70.0%	75.60%	108.00%
Median Earnings (2nd Q after Exit)	Exiters 07/01/21-06/30/22		
Title III - Wagner-Peyser	\$7,000.00	8,688	124.11%
Adult	\$7,000.00	9,230	131.86%
DW	\$8,000.00	10,440	130.50%
Youth	\$3,200.00	4,383	136.97%
Credential Attainment Rate	Exiters 01/01/21-12/31/21		
Title III - Wagner-Peyser			
Adult	61.0%	52.00%	85.25%
DW	76.5%	71.60%	93.59%
Youth	60.0%	71.30%	118.83%
Measurable Skill Gains	Active 07/01/22-06/30/23		
Title III - Wagner-Peyser			
Adult	45.0%	53.80%	119.56%
DW	43.0%	58.70%	136.51%
Youth	40.5%	37.20%	91.85%

Rhode Island is generally pleased with statewide performance for PY2022, having met or exceeded multiple employment and earnings performance indicators across Adult, Dislocated Worker, Youth, and Wagner-Peyser programs. As anticipated, performance on these metrics has improved and recovered from the Covid-19 pandemic and the associated economic challenges and disruptions. However, there were a few areas of deficiency that we will focus on improving.

While no metric fell below the 50% performance threshold for single individual indicator; Rhode Island underperformed against its negotiated goals for Youth Measurable Skill Gains (91.85% of target), as well as Adult and Dislocated Worker Credential Attainment (85.25% and 93.59%, respectively).

Rhode Island has been closely monitoring Measurable Skill Gains (MSG) performance for WIOA Youth throughout the Program Year. As MSG had historically seen steady performance and had been insulated from the ups and downs of the state economy; we believe the underperformance is a matter of underreporting. In August 2023 the state delivered a technical assistance training to Title I staff throughout the state (Youth provider staff included) to improve the tracking and reporting of MSGs. A copy of the training is viewable [here](#).

Further, Rhode Island is working with frontline Adult and Dislocated Worker staff on how to better articulate and record Credentials among Participants. This includes a planned statewide webinar on Recording and Reporting Credential Attainment as well as a front-end review of which activities and training programs are expected to result in a credential and should therefore receive special attention.

Common Exit Policy

For the purposes of performance calculations in all WIOA core programs, except Vocational Rehabilitation, exit is the point after which an individual who has received services through any program meets specific criteria (§677.150(c)). This criterion is:

- i. 90 days of no services has elapsed, and
- ii. No future services are planned

For the purposes of this definition, a participant's use of self-service or the provision of information-only activities or follow-up services will not prevent a participant's exit. For the Vocational Rehabilitation program, an individual would be determined to have exited the program on the date the individual's case is closed in accordance with the Vocational Rehabilitation program requirements. Under Vocational Rehabilitation, those individuals who have achieved a supported employment outcome at a subminimum wage are excluded from the definition of "exit".

PY2022-2023 Negotiated Performance Levels

Performance Measures		PY 2022	PY 2023
WIOA Title I Adults			
Employment (Second Quarter after Exit)		80.5%	82.0%
Employment (Fourth Quarter after Exit)		78.5%	80.0%
Median Earnings		\$7,000.00	\$7,100.00
Credential Attainment Rate		61.0%	62.5%
Measurable Skill Gains		45.0%	47.0%
WIOA Title I Dislocated Workers			
Employment (Second Quarter after Exit)		82.5%	83.0%
Employment (Fourth Quarter after Exit)		83.0%	83.5%
Median Earnings		\$8,000.00	\$8,100.00
Credential Attainment Rate		76.5%	77.0%
Measurable Skill Gains		43.0%	43.5%
WIOA Title I Youth			
Employment (Second Quarter after Exit)		72.0%	72.5%
Employment (Fourth Quarter after Exit)		70.0%	70.5%
Median Earnings		\$3,200.00	\$3,300.00
Credential Attainment Rate		60.0%	60.5%
Measurable Skill Gains		40.5%	41.0%
WIOA Title III Labor Exchange (LEX)*			
Employment (Second Quarter after Exit)		61.4%	62.4%
Employment (Fourth Quarter after Exit)		65.3%	66.0%
Median Earnings		\$7,000.00	\$7,100.00

Data Validation

Data element validation is conducted to ensure that the data elements in participant records used to calculate aggregate reports are accurate. Data element validation involves reviews of a sample of participant records against source documentation to ensure compliance with federal definitions. The sample files are selected by the Office of Planning, Integrity, & Compliance from reported participants and participants that have exited in EmployRI. WIOA and discretionary grant data element validation is conducted remotely. Participant data and documentation is available for review electronically in EmployRI.

Sample files are selected running WIOA Performance Reports with the Participant Individual Record Layout (PIRL) Reporting Assistant. Data Samples for Wagner-Peyser, Adult, Dislocated Worker, Youth and Trade, are randomly selected to conduct Data Validation on a Quarterly basis for each Program Year. Electronic Worksheets are completed and sent to Program Managers for Failed Elements to be corrected.

- **Activities provided with the funds reserved by the governor, which can be up to 15% of the state's allotment. In this section of the narrative, states may describe activities undertaken in whole or in part with their Governor's Reserve and how those activities have directly or indirectly impacted performance.**

During PY 2022, Governor's Reserves funds were predominately spent on required activities including the WIOA monitoring and compliance work of the Department of Labor and Training's Office of Policy, Integrity, and Compliance (formerly known as the Integrity and Compliance Unit), as well as finance and accounting staff and operations. Funding was also used in support of the State Workforce Development Board staff and operations for WIOA oversight and related activities.

- **Rapid response activities and layoff aversion, which may include:**
 - **Data on number of companies served and number of individuals served.**
 - **Discussion of strategies for linking Rapid Response recipients to American Job Centers and processes for intake or co-enrollment in the Trade Adjustment Assistance and the Dislocated Worker programs.**
 - **Discussion of layoff aversion strategies, including any metrics/outcomes developed and/or tracked by the state with respect to layoff aversion, such as return on investment or measures showing the economic benefits of Rapid Response and layoff aversion.**
 - **Discussion of how Rapid Response and layoff aversion activities are aligned with business engagement, sector strategy, and career pathway efforts, which may include a discussion of any systems, tools, networks or approaches designed to identify companies in distress and strategies to deliver necessary solutions as early as possible, as well as outcomes of the use of such systems or tools.**
 - **Discussion of specific types of services or workshops provided to both companies and affected workers.**

RIDLT's Rapid Response Layoff Aversion program provides wraparound assistance to companies at risk of layoffs or plant closures by planning and coordinating ahead of dislocation events with the ability to mobilize services to aid companies and their affected workers and minimize disruptions associated with job loss. The Rapid Response program is built on a proactive approach and strives to sustain relationships with federal, state, and local quasi-interagency through RIDLT Labor and Market Information Division, RI Commerce Corporation, HealthSource Rhode Island, and USDOL Employee Benefits Security Administration. Program customization and responsiveness regarding service delivery to meet business and worker demands have leveraged technology tools and digital enhancements to maintain effectiveness, including options for virtual information sessions, job fairs, and customized workshops to promote job readiness.

In PY 2022, RIDLT's Rapid Response program assisted 42 companies and 1079 dislocated workers from various industries, offering informational sessions and career readiness workshops in several languages to support linguistic needs. During these events, representatives (community, state, and federal levels) offered resources on health insurance, unemployment insurance benefits, reemployment topics, available training options through the Trade Adjustment Assistance and Health Care and Retirement Coverage by US DOL Employee Benefits Security Administration.

Trade Adjustment Assistance and Rapid Response:

The Rapid Response team generates referrals to the Trade Adjustment Assistance (TAA) process, and staff regularly discuss companies experiencing closures or layoffs and those who may or may not be eligible for TAA. Job Coaches and Business Services Representatives are involved in Rapid Response activities to create an operational link to American Job Centers and

a pathway to additional programs or resources in areas of job-readiness workshops and informational sessions. In PY22, Rhode Island supported impacted employees falling under currently approved Trade petitions. The Trade team continues to investigate and submit petitions in the anticipation of future Trade approved funding.

- **Activities provided under the Wagner-Peyser Act Employment Service section 7(b) (e.g., services to groups with special needs or extra costs of exemplary models for delivering services).**

N/A

- **Any National Dislocated Worker Grants (DWGs) awarded to or within the state and how those funds are coordinated with state rapid response activities and dislocated worker programs, as well as how the DWGs fit in with state co-enrollment policies and disaster/emergency management activities, as applicable.**

The QUEST Disaster Recovery DWG was awarded to Rhode Island DLT on September 26, 2022. RI DLT drove the vision of QUEST DWG services and programs by formally uniting the alliance of worker, employer, and community organizations and representatives that carried the framework for successful system enhancement and project deployment. Rhode Island focused on a no-wrong-door approach support participant enrollment through multiple entry points including Community Based Organizations and American Job Centers. In line with this effort, through Rhode Island's signature sector partnership initiative Real Jobs RI, RIDLT executed contracts with over 30 organizations aligned to critical industry sectors, including infrastructure-related sectors and the care economy. These contracts represent workforce development programs specifically aligned with the QUEST intent. Contracts were also executed with the Rhode Island Office of Postsecondary Commissioner Support Service Navigator program and all of Rhode Island's Local Workforce Development Boards.

In order to fully realize the QUEST goal, and ensure sustainability of services, Rhode Island focused on shoring up the foundational components of project development and implementation. In PY22 RIDLT finalized policies and procedures for interpreting and determining eligibility and participation under QUEST DWG, gaining approval of Local Boards as well as the Governor's Workforce Board. RIDLT also made grant-specific modifications to the management information systems aligned to the QUEST DWG project with coding added to track enrollment progress of participants requiring more accessible enrollment platforms.

To ensure accessibility and focus on reaching historically underserved communities, Rhode Island is leveraging the Office of Community Engagement's Community Partners, an important resource for maintaining an equity focus on outreach, recruitment and enrollment. Finalized in January 2023, the goal of this group is to have direct alignment with community-based organizations who will advise RIDLT on culturally and linguistically appropriate programming

and to engaging general education and outreach to better serve historically marginalized populations and populations with barriers to employment. Based on the recommendations of this State-funded group, both RJRI Partnerships and RIDLT writ large are advised on ways in which entry into programs can be made more accessible and processes restructured to ensure that unintentional barriers to engagement are addressed.

In PY23 RIDLT will continue to work through Real Jobs RI partnerships, the American Job Centers as well as partnering with the RI Department of Corrections to provide 'behind the walls' services and build the framework for referral and support. The Office of Community Engagement also continues to serve as an important resource for maintaining an equity focus in outreach, recruitment and enrollment and have completed a selection process for Community Engagement Partners.

In PY 22 Rhode Island served 547 participants through the QUEST DWG. To this end, Rhode Island is on track and on schedule to satisfy grant objectives and will continue to work towards refining practices in accordance with continuous improvement and to ensure sustained participant services.

- **Any technical assistance needs of the state workforce system. 2 See WIOA section 128(a)(1).**

N/A.

- **Promising practices, lessons learned, and success stories that focus on serving employers, communities, and individuals with barriers to employment, including information based on the state's evaluation and related research projects. This discussion should cover a broad range of at-risk and priority populations served, including out-of-school youth, low-income adults, dislocated workers, individuals who are basic skills deficient, individuals with limited language proficiency, individuals with disabilities, veterans, the long-term unemployed, and any other individuals with barriers to employment, or other populations the state may wish to discuss.**

Rhode Island's piloting of culturally-competent and community-based affiliate American Job Centers is a promising practice for improving reach, recruitment, and recognition of the WIOA system. This effort is comprised of smaller job centers housed in trusted and recognized community organizations within underserved communities (including low-income adults, individuals who are basic skills deficient, individuals with limited language proficiency, and others). As one community member put it, these organizations are viewed as "looking out for our (the community's) best interest" and thus have credibility and trust within their community. Partnering with these organizations and locating WIOA services within their location leverages that credibility and helps the WIOA system reach job seekers and communities that we have otherwise been challenged to engage. Rhode Island is taking a measured and strategic approach to expanding this model; pursuing mutually beneficial opportunities with a focus on hardest-to-serve/reach populations.

- **Any challenges the state workforce system faces, which may include policy, implementation, or other relevant challenge.**
N/A.
- **Any strategies/policies relating to Pay-for-Performance contracting, which may include examples from local areas**
N/A.

- **Identify each waiver that the state has had in place for at least one program year and provide information regarding the state’s progress toward achieving the goals and performance outcomes in ETA’s letter of approval for the waiver (sec 189(i)(3)(C)(ii)) and outlined in the state’s waiver request (when applicable). Discuss how activities carried out under each approved waiver have directly or indirectly affected state and local area performance outcomes. To the extent possible, provide quantitative information.**

Rhode Island had three waivers from the USDOL-ETA in place for at least one program year in PY2022: (1) a waiver of the requirements outlined at Sec. 107 of the Workforce Innovation and Opportunity Act, allowing the state board to function as a local board for the Greater Rhode Island area; (2) a waiver of WIOA Section 134(c)(3)(H)(i) and 20 CFR 680.720(b) in order to increase on-the-job training (OJT) employer reimbursement up to 90 percent for businesses with 50 or fewer employees; and (3) a waiver associated with the requirement at WIOA Section 129(a)(4)(A) and 20 CFR 681.410 that the State and local areas expend 75 percent of Governor’s reserve youth funds and local formula youth funds on out-of-school youth (OSY).

The primary goal and outcome related to the **waiver allowing the state board to function as a local board for the Greater Rhode Island** area was to comply with the governance provisions of WIOA and resolve a USDOL-ETA compliance finding. WIOA requires Chief Local Elected Officials to administer WIOA Title I funds and to appoint Local Workforce Development Board members. In Rhode Island, dating back to the Workforce Investment Act (WIA), the Governor had performed the functions of the Chief Local Elected Official for the Greater Rhode Island (GRI) LWDA. This means the Governor was appointing both the State Workforce Development Board (SWDB) and the GRI LWDB.

Under WIOA, the Governor continued to serve as the Chief Elected Official for the GRI LWDB. During a compliance monitoring review conducted in February 2018, United States Department of Labor (USDOL) regional staff identified that the Governor acting in this capacity was inconsistent with WIOA requirements because the Governor was not a local elected official and, thus, could not appoint the local board. USDOL-ETA staff advised finding one or more local elected official(s) to assume the role of Chief Local Elected Official for the area or submit a waiver requesting that the SWDB act as, and carry out roles and responsibilities of, the GRI LWDB. After conferring with the Rhode Island League of Cities and Towns (Which represents all 39 municipalities in Rhode Island, including the 37 that make up the Greater Rhode Island area), the state elected to submit a waiver to allow the state board to function as a local board for Greater Rhode Island. This waiver was initially approved in September 2019 with a condition that the Board ensure continued local input and feedback into decisions impacting the Greater Rhode Island area. In response, the Board worked with the League of Cities and Towns to establish a Local Area Advisory Committee for the State Board. This Subcommittee has continuously met throughout PY2021 and PY2022 and helps ensure local area ‘voice’ and representation in key WIOA-related matters including policymaking, service data and

demographic analysis, modification of the local WIOA plan, overseeing rehabilitation and upgrading of the local area American Job Centers, and other matters. The ultimate responsibility for these functions remains with the board.

This waiver was subsequently reauthorized in September 2020 and June 2022, with the conditions that the State meet the following requirements:

- Establish a written agreement delineating the roles of and firewalls among the state board, board staff, fiscal agent, and service providers;
- Demonstrate administrative procedures and policies consistent with Uniform Guidance;
- Conduct regular and complete monitoring of local areas.

In response to condition one; on March 29, 2021, the state provided USDOL regional staff a copy of the document entitled “Firewalls and Internal Controls Re: State and Local Board Responsibilities.” This document memorialized the internal controls that all staff adhere to when fulfilling State and Local Workforce Board responsibilities in order that business will be conducted in a manner that will prevent actual, potential, or questionable conflicts of interest and will provide clear separation of duties.

In response to condition two; the Board’s administrative and fiscal agent, the Department of Labor and Training, continues to conduct the responsibilities and functions of both boards consistent with Uniform Guidance. Administrative and fiscal procedures were shared with, and reviewed by, USDOL-ETA staff during a PY2022 Consolidated Compliance Review. Any issues or deficiencies with those procedures were addressed and resolved through corrective action.

In response to condition three, the state continues to conduct regular monitoring of local areas. Consistent with the terms of the waiver, the state revised its statewide monitoring policy to ensure that local monitoring decisions were free from any actual, potential, or perceived conflicts of interest. In CY2022, the state Office of Planning, Integrity, and Compliance conducted a comprehensive fiscal monitoring of the Providence/Cranston workforce development area. A similar review of the Greater Rhode Island workforce development area is planned for the near future.

The primary goal and outcomes of the **waiver of WIOA Section 134(c)(3)(H)(i) and 20 CFR 680.720(b) in order to increase on-the-job training (OJT) employer reimbursement up to 90 percent for businesses with 50 or fewer employees**; included: increased flexibility for smaller Rhode Island businesses to help them ramp up operations and keep pace with evolving market demands as the state recovers from the economic impacts of the pandemic; and to increase the usage of OJT among smaller firms. Per the US bureau of Labor Statistics, 92% percent of Rhode Island entities were those which employed fewer than 20 workers in 2022. The initial waiver was approved on August 13, 2021 and reauthorized in June 7, 2022. Both local areas opted to utilize the flexibility provided through the waiver and passed policy reforms introducing a tiered reimbursement structure for OJTs based on employer size:

- 50 or fewer employees: up to ninety percent (90%) on-the-job training employer reimbursement (or the maximum allowable [\$24.84 as of March 2023], whichever is less);
- 51-250 employees: up to seventy-five percent (75%) on-the-job training employer reimbursement (or the maximum allowable reimbursement [\$24.84 as of March 2023], whichever is less);
- 250 employees+: up to fifty percent (50%) on-the-job training employer reimbursement (or the maximum allowable reimbursement [\$24.84 as of March 2023], whichever is less)

In the Greater Rhode Island Workforce area; 15 out of 16 (93%) OJT establishments were businesses under 50 employees in PY2022. 10 of those 15 establishments were under 20 employees.

In the Providence Cranston Workforce area; 11 out of 15 (73%) OJT establishments were businesses under 50 employees in PY2022. 3 of those 11 establishments were under 20 employees.

We anticipate this ratio to maintain or increase as both local areas continue to build employer awareness and outreach regarding the enhanced match.

The primary goal of the **waiver associated with the requirement at WIOA Section 129(a)(4)(A) and 20 CFR 681.410 that the State and local areas expend 75 percent of Governor’s reserve youth funds and local formula youth funds on out-of-school youth (OSY)**; was to better meet the needs of our youth population and help expand and scale school-to-career programming and drop-out prevention strategies, especially in light of and in response to the challenges related to the Covid-19 pandemic. 24% of WIOA Youth served in PY2018 were in-school youth, compared to 23% in PY2019, 31.4% in PY2020 (above the program maximum and attributed to the disruptions of the pandemic) and 24.3% in PY2021. In PY2022, 20.6% of all WIOA Youth served statewide were in-school youth. While both local areas valued and appreciated the added flexibility that the waiver provided; the urgency of serving in-school youth and augmenting their traditional education experience with WIOA Youth services has subsided since the pandemic; while the social/emotional, academic, and economic needs of out-of-school youth continued to grow.

- **Identify the two approaches the state has chosen for the Effectiveness in Serving Employers performance indicator pilot. If the state is piloting a state-established measure of Effectiveness in Serving Employers, or has any other metrics to assess employer engagement, describe the measure or metric as well.**

WIOA sec. 116(b)(2)(A)(i)(VI) requires the US Departments of Labor and Education to establish a primary indicator of performance for effectiveness in serving employers. In December 2016, the Departments announced they will be piloting three approaches designed to gauge three critical workforce needs of the business community.

Approach 1 – Retention with the same employer

Approach 2 – Repeat Business Customers

Approach 3 – Employer Penetration Rate

Rhode Island elected to adopt Approach 1 (Retention with the same employer) and Approach 3 (Employer Penetration Rate) described below.

Approach 1 – Retention with the same employer: The number of participants with wage records who exit during the reporting period and were employed by the same employer during the second quarter after exit and the fourth quarter after exit DIVIDED by the number of participants with wage records who exit and were employed during the second quarter after exit.

Approach 3 – Employer Penetration Rate: The total number of establishments, as defined by the BLS QCEW program, that received a service or, if it is an ongoing activity, are continuing to receive a service or other assistance during the reporting period DIVIDED by the total number of establishments, as defined by BLS QCEW, located within the State during the final month or quarter of the reporting period.

Measure	Rate
Retention with Same Employer in the 2nd and 4th Quarters After Exit Rate	72.4%
Employer Penetration Rate	5.7%

- **Include brief descriptions of: (a) current or planned evaluation and related research projects, including methodologies used; (b) efforts to coordinate the development of such projects with WIOA core programs, other state agencies and local boards; (c) a list of completed evaluation and related reports and links to where they were made accessible to the public electronically; (d) State efforts to provide data, survey responses, and timely site visits for Federal evaluations; and (e) any continuous improvement strategies utilizing results from studies and evidence-based practices evaluated.**

RIDLT recognized in early 2022 that the state had not been completing regular evaluations of its WIOA Title I programming consistent with 20 CFR 682.220. In PY2022, RIDLT lead a coalition of partner WIOA state agencies in applying to the 2022-2023 Evaluation Peer Learning Cohort (EvalPLC) hosted by the United States Department of Labor in the hopes that the initiative would offer a shared space where the state could identify collective evaluation needs and wants, receive guidance, support and expertise from experienced facilitators on how to overcome barriers to collaboration, and begin the development of an action plan for joint data analysis and performance evaluation.

The Rhode Island team was comprised of ten individuals from each of the four core WIOA programs, plus TANF; as well as an observer representative from the SNAP Employment and Training program. Each WIOA program appointed one program and one data/evaluation staff person to the effort. RIDLT was the lead applicant and facilitator for the EvalPLC, helped engage each partner state agencies in the work, oversaw agency collaboration in finalizing data sharing agreements, and will be the primary entity responsible for data analysis and final dissemination of evaluation results to the rest of the team and external stakeholders.

RIDLT's participation in the EvalPLC was of great value and has considerably enhanced our capacity for conducting 20 CFR 682.220-compliant evaluations and expanded our overall evaluation toolbox. As State Workforce Agency and administrative agent for the State Workforce Development Board, the Department of Labor and Training will serve as lead for conducting WIOA evaluations. The evaluations will be overseen by the Department's PhD-level Director of Data and Performance, in concert with designated staff from each involved program.

As of the writing of this report, the state is in the process of completing its first cross-program evaluation - a study of the geographic location of the WIOA service locations and their associated outreach and recruitment networks, as compared to state's communities and subcommunities of greatest economic need. The design and scope of this evaluation was consistent with the state WIOA Plan and the Governor's priority of ensuring equitable access and a specific focus on serving traditionally underserved communities. The state will share the results of the evaluation with appropriate USDOL parties once completed.

- **Describe the state’s approach to customer satisfaction, which may include such information used for one-stop center certification, in accordance with 20 CFR 678.800. This description should include: 1) the state’s methodologies; 2) the number of individuals/employers who were provided customer satisfaction outreach, the response rate, and efforts made to improve the response rate; 3) the results and whether the results are generalizable to the entire population of customers; and 4) a description of any continuous improvement processes for incorporating the customer satisfaction feedback.**

Rhode Island integrates customer satisfaction and outreach into the ongoing activities of the workforce development network, and the state’s approach is customized by program, creating a manifold feedback system. The state uses collected feedback to aid in service delivery and in identifying enhancements that may further benefit employers and job seekers. With the assistance of the Brown University Policy Lab, the state implemented an evidence-based evaluation in PY 2021 that assesses qualitative measures of RIDLT career services associated with RESEA. The survey was developed as an ongoing assessment distributed to RESEA clients and provide insight into intervention efficacy, satisfaction, barriers, and other criteria.

In PY22 Rhode Island continued to refine this survey, to assess Title IB service satisfaction more fully. Each response is read by Rhode Island Workforce leadership to ensure client services are continuously improved.

To ensure further accessibility Rhode Island presented this survey, and Workforce outreach materials before Rhode Island’s Office of Community Engagement Partners for feedback. The Partners (made up of over 20 Community-Based Organizations (CBOs) selected to advise the RIDLT on culturally- and linguistically appropriate programming and to engage in general education and outreach to better serve historically marginalized populations and populations with barriers to employment) gave honest and open feedback during multiple meetings which informed adjustment of some of the verbiage and approach of the survey. Additionally, the Partners were given direct communication pathways to RI DLT Workforce and Income Support leadership to ensure that any questions their clients may have about those services have direct feedback pathways. In PY22 RIDLT surveyed 168 unique Title I B clients with 23 unique responses.

