



# State of Rhode Island WIOA PY2023

## Narrative Performance Report



In Program Year (PY) 2023, Rhode Island’s public workforce system continued to deliver quality services to job seekers and employers, aligned with the goals of the Workforce Innovation and Opportunity Act (WIOA). The state built on the work of previous years to further enhance collaboration and strengthen our system to better serve all Rhode Islanders.

Emerging from the economic depths caused by the Covid-19 pandemic; in April 2024, Rhode Island surpassed its pre-pandemic job total and set a new record for Rhode Island-based employment (513,700). June 2024 saw new records for labor force size (590,332) and employment (564,798). Economic (GDP) growth in the first quarter of 2024 (3.0%) was by far the highest in New England and was ranked seventh across the country.<sup>1</sup>

The state workforce system played its part in building on this momentum while ensuring that our economic recovery is as equitable and widespread as possible. PY2023 witnessed the ribbon cutting of the new Providence American Job Center (AJC) and significant updates and renovations of the state’s two other American Job Centers. The state board reviewed several state policies and eligibility standards with a continued focus on broadening eligibility and ensuring accessibility to historically underserved communities. For example, as described in the Best Practices section later in this report; the Board conducted a comprehensive review of its Lower Living Standard Income Level guidance and particularly the state definition of ‘economic self-sufficiency’. The Board also embraced the flexibility provided by the US Department of Labor through guidance letters and regulation to allow greater leeway and patience for participants to locate, gather and produce eligibility documentation.

The state board also substantially revised and modernized its Eligible Training Providers List Policy; simplifying/clarifying administrative requirements, streamlining eligibility, and updating rules regarding virtual instruction which has grown in popularity since the pandemic.

This work builds upon and leverages the innovations and improvements made in recent program years including the dramatic expansion in the availability of support services 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, the continued expansion of Registered Apprenticeship Programs, and changes to WIOA eligibility and documentation requirements to increase enrollment and outreach while maintaining compliance with the WIOA law.

There is critical work remaining to ensure continued economic stability and security for Rhode Island’s business and career seeker 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.

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<sup>1</sup> <https://www.bea.gov/news/2024/gross-domestic-product-state-and-personal-income-state-1st-quarter-2024>

- **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.**

Throughout PY2023, the State Board, Local Boards, and the various state agencies administering the WIOA programs, as well as advocates, industry and business representatives, labor representatives, and others, helped prepare the state’s new WIOA plan which goes into effect beginning with Program Year 2024. Rhode Island’s 2020-2023 WIOA Plan, which governed the workforce system throughout PY2023, including 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 2023 (PY23), the Department of Labor and Training (in its role as State Workforce Agency) 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. This included a significant increase in the number of employer-led Registered Apprenticeship Programs appearing on the ETPL.

The state also made progress in advancing a career pathways system for all job seekers, particularly those with barriers to employment. As mentioned above, PY2023 saw revisions to the states Lower Living Standard Income Level to help more low-income Rhode Islanders access occupational training. The state also revised its ETPL policy to simplify the process and make the ETPL more appealing to education and training programs.

In Fall 2023 the state also began 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 evaluation identified high potential ‘service deserts’ and helped inform the board’s strategic decision making as well as planned outreach and recruitment efforts.

- **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.

A key focus during PY2023 was expanding apprenticeship opportunities aligned with these industry clusters. Rhode Island has been at the leading edge of states implementing Registered Apprenticeship programs (RAPs) as an effective training and career preparation tool under WIOA. Rhode Island has emphasized developing RAPs outside of the traditional trades and in the state’s largest and growing industries. The state has registered a number of new models in manufacturing, healthcare, and information technology, among others; and - through collaboration between the state apprenticeship office and the WIOA network - encourages placement of such programs on the Eligible Training Provider List whenever practical.

### *Career Pathways*

A key priority for Rhode Island's career pathways system throughout PY2023 was to expand access and eligibility for participants, within the confines and boundaries of the WIOA law. Utilizing flexibility granted through guidance letters issued by the USDOL; during PY2023 Rhode Island revises policies and procedures relating to eligibility documentation to responsibly allow for self-attestation whenever prudent and offer an expanded window during which participants could receive services as they locate and gather required documents. This reform was especially helpful for populations with barriers to employment and those whose living situation may be unstable.

A second key priority for Rhode Island's career pathways system during PY2023 was to build strategic referral and reference partnerships with organizations and/or state agencies serving target populations with barriers to employment, allowing easier identification and access to these populations. Expanded coordination with programs serving disabled (Vocational Rehabilitation), low-income (the TANF program), current and former foster youth (the state Department of Children, Youth, and Families) and justice-involved (Corrections) are just a few examples.

- **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 7 displays the negotiated goal, actual state performance, and percent of goal attained as reported for Program Year 2023 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 2023 Final             |             |           |
|---|---------------------------|-------------|-----------|
|   | Neg Perf Goal             | Actual PYTD | % of Goal |
| <b>Employment (2nd Q after Exit)</b>      | Exiters 07/01/22-06/30/23 |             |           |
| Title III - Wagner-Peyser                 | 62.40%                    | 67.80%      | 108.65%   |
| Adult                                     | 82.00%                    | 86.70%      | 105.73%   |
| DW  | 83.00%                    | 78.80%      | 94.94%    |
| Youth                                     | 72.50%                    | 72.90%      | 100.55%   |
| <b>Employment (4th Q after Exit)</b>      | Exiters 01/01/22-12/31/22 |             |           |
| Title III - Wagner-Peyser                 | 66.00%                    | 71.10%      | 107.73%   |
| Adult                                     | 80.00%                    | 78.30%      | 97.88%    |
| DW  | 83.50%                    | 87.50%      | 104.79%   |
| Youth                                     | 70.50%                    | 72.20%      | 102.41%   |
| <b>Median Earnings (2nd Q after Exit)</b> | Exiters 07/01/22-06/30/23 |             |           |
| Title III - Wagner-Peyser                 | \$7,100.00                | \$8,717.00  | 122.77%   |
| Adult                                     | \$7,100.00                | \$9,226.00  | 129.94%   |
| DW  | \$8,100.00                | \$10,114.00 | 124.86%   |
| Youth                                     | \$3,300.00                | \$3,805.00  | 115.30%   |
| <b>Credential Attainment Rate</b>         | Exiters 01/01/22-12/31/22 |             |           |
| Title III - Wagner-Peyser                 |                           |             |           |
| Adult                                     | 62.50%                    | 60.00%      | 96.00%    |
| DW  | 77.00%                    | 75.00%      | 97.40%    |
| Youth                                     | 60.50%                    | 65.10%      | 107.60%   |
| <b>Measurable Skill Gains</b>             | Active 07/01/23-06/30/24  |             |           |
| Title III - Wagner-Peyser                 |                           |             |           |
| Adult                                     | 47.00%                    | 65.00%      | 138.30%   |
| DW  | 43.50%                    | 49.80%      | 114.48%   |
| Youth                                     | 41.00%                    | 53.90%      | 131.46%   |

Rhode Island is pleased with statewide WIOA performance for PY2023, having met or exceeded multiple employment and earnings performance indicators across Adult, Dislocated Worker, Youth, and Wagner-Peyser programs. As anticipated, performance on employment and earnings metrics has improved and recovered from the Covid-19 pandemic and the associated economic challenges and disruptions. Rhode Island is especially proud that these performance marks were achieved alongside a devoted focus on reaching traditionally underserved populations throughout the program year.

No single metric fell below the 50% performance threshold for single individual indicator; however, Rhode Island underperformed against its negotiated goals for Dislocated Worker 2<sup>nd</sup> Quarter employment (94.94% of target); Adult 4<sup>th</sup> Quarter employment (97.88% of target) as well as Adult and Dislocated Worker Credential Attainment (96.00% and 97.40%, respectively).

Rhode Island will continue to monitor 2<sup>nd</sup> and 4<sup>th</sup> quarter employment rates to ensure they meet negotiated goals. Additional staff capacity and training may help provide the support and guidance participants need to obtain employment.

The state will also provide continuing technical assistance regarding how to identify, track and report credential attainment. Technical assistance provided in response to the state's PY2022 performance report appears to have borne fruit. In PY2022, Rhode Island underperformed against its negotiated goals for Youth Measurable Skill Gains (91.85% of target). 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 Measure Skill Gains and the result is that Youth Measurable Skill Gains are now at 131.46% of target for PY2023. The state has also seen improvement in Adult and Dislocated Worker Credential Attainment, rising from 85.25% to 96.00% of target and from 93.59% to 97.40 of target, respectively, from PY2022 to PY2023.

The state will continue to prioritize staff training, technical assistance, and support to meet the employment and education goals of our participants; and the WIOA performance goals set for our state.



### *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".

*PY2024-2025 Negotiated Performance Levels*

| <b>Performance Measures</b>                 |  | <b>PY 2024</b> | <b>PY 2025</b> |
|---|--|----------------|----------------|
| <b>WIOA Title I Adults</b>                  |  |                |                |
| Employment (Second Quarter after Exit)      |  | 82.50%         | 83.00%         |
| Employment (Fourth Quarter after Exit)      |  | 80.50%         | 81.50%         |
| Median Earnings                             |  | \$ 7,500.00    | \$ 8,100.00    |
| Credential Attainment Rate                  |  | 59.00%         | 60.50%         |
| Measurable Skill Gains                      |  | 47.50%         | 48.00%         |
| <b>WIOA Title I Dislocated Workers</b>      |  |                |                |
| Employment (Second Quarter after Exit)      |  | 86.00%         | 86.50%         |
| Employment (Fourth Quarter after Exit)      |  | 84.50%         | 85.50%         |
| Median Earnings                             |  | \$ 9,500.00    | \$ 9,750.00    |
| Credential Attainment Rate                  |  | 71.50%         | 72.00%         |
| Measurable Skill Gains                      |  | 44.00%         | 44.50%         |
| <b>WIOA Title I Youth</b>                   |  |                |                |
| Employment (Second Quarter after Exit)      |  | 73.00%         | 73.50%         |
| Employment (Fourth Quarter after Exit)      |  | 71.00%         | 71.50%         |
| Median Earnings                             |  | \$ 3,750.00    | \$ 4,000.00    |
| Credential Attainment Rate                  |  | 63.00%         | 63.50%         |
| Measurable Skill Gains                      |  | 39.00%         | 40.50%         |
| <b>WIOA Title III Labor Exchange (LEX)*</b> |  |                |                |
| Employment (Second Quarter after Exit)      |  | 65.00%         | 65.50%         |
| Employment (Fourth Quarter after Exit)      |  | 68.00%         | 68.50%         |
| Median Earnings                             |  | \$ 8,000.00    | \$ 8,250.00    |

*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 2023, 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.

RI's Rapid Response program assisted 24 companies and 1, 314 dislocated workers from a wide variety of industries in PY 2023. , 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. The Rapid Response Team offered virtual as well as in-person services to help provide laid off employees with all the tools needed to re-enter the workforce as quickly as possible

Trade Adjustment Assistance and Rapid Response: To effectively link Rapid Response recipients to American Job Centers (AJCs) and facilitate co-enrollment in the Trade Adjustment Assistance (TAA), and other Dislocated Worker (DW) programs, a comprehensive strategy was developed that included a coordinated outreach to employers by a dedicated staff member of the Employer Engagement team. The Department of Labor & Training (DLT) also developed a streamlined referral process during and after a Rapid Response event, to allow for expedited communication between the TAA Counselor and the job seeker. Upon receiving Rapid Response services, impacted individuals are informed about available workforce development programs, including, but not limited to TAA, with guidance on eligibility criteria and enrollment procedures if applicable. AJCs have assigned intake staff to assist individuals in navigating the intake process, ensuring they were co-enrolled in both TAA and WIOA programs if eligible. Additionally, WDS continues to utilize [www.EmployRI.org](http://www.EmployRI.org) to track referrals and monitor progress, enhancing case management and ensuring timely reemployment services. The web-based program continues to allow for staff, and self-assisted services to better assist the customer in their goal of enhancing skills and eventually, reemployment. It also serves as our Client Management System as it plays a crucial role in tracking services with the job seeker and allows for seamless transitions with the job coach and administration should changes within DLT occur. [www.Backtoworkri.com](http://www.Backtoworkri.com) is used as our team's way of virtually meeting with job seekers for a seamless way of ensuring accurate intake, service, and follow-up communications.

In PY23, Rhode Island continued to support impacted employees falling under previously approved Trade petitions. The Rhode Island 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 PY23 Rhode Island made tremendous progress meeting the stated goals and intent of the QUEST grant program - to support pandemic-impacted workers, industries, and communities. Our focus on training for in-demand occupations coupled with intentional community engagement to ensure awareness and accessibility, resulted in the provision of services two thousand one hundred and seventy (2170) Rhode Islanders during the program year (2458 total for the current grant performance) and surpassing our stated enrollment goal. In keeping with the QUEST focus of ensuring services for those most impacted by the COVID-19 pandemic, ninety one percent (91%) of Rhode Island's QUEST served participants are experiencing at least one of the following barriers to employment: justice involved, English Language Learners, those experiencing houselessness, single parents/runaway youth, low income individuals, Migrant Seasonal Farmworkers, elder individuals, and Long Term Unemployed.

A large part of this success in enrollments was Rhode Island's deliberate and uncompromising focus on fulfilling the intent of the QUEST NDWG, through engaging communities across Rhode Island and ensuring access to the trainings funded for those disproportionately impacted by the COVID-19 pandemic. This commitment to equity, while vital and necessary, required additional time to implement trainings that ensured client diversity and access. This focus also highlighted that many of the clients served by our contractors required supplementary supports to be training ready, additional case management, credential supports, as well as enhanced non training supports to address myriad socioeconomic barriers to employment. These additional supports also required additional time and resulted in credential and employment outcomes that are not yet fully realized for some of our clientele.

To fully realize the opportunities supported by the QUEST grant, in PY23 Rhode Island sought and was awarded a no-cost Period of Performance extension. With this additional time Rhode Island is ensuring credentialing and employment opportunities are fully supported for all communities served, as well as continuing to support enrollments through the American Job Centers and contracted training providers.

- **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.**

As mentioned previously, Rhode Island reviewed a number of policies and procedures related to participant eligibility, including the Lower Living Income Standard Level definition and the definition of economic self-sufficiency. We felt this relatively small change is a best practice that can be replicated elsewhere.

Rhode Island previously set its economic self-sufficiency standard at 100% of the Lower Living Standard Income Level. This means that an unmarried participant without dependents making as little as \$17,499 would be considered 'economically self-sufficient' and thus ineligible for occupational training. For comparison's sake, in 2023...

- the Rhode Island minimum wage annualized for a 40-hour work week was \$27,040,
- the State income threshold for maintaining TANF and SNAP benefits for a family of one was \$26,973, and
- the State income limit to access home heating assistance for a family of one was \$34,039.

As a result of this, overly restrictive definition and policy, American Job Center staff had to turn away training seekers who made as little as \$17,500 per year because they were deemed 'economically self-sufficient' under the old definition. After completing its review and analyzing self-sufficiency thresholds in similar states and local areas, the Board revised Rhode Island's limit to 175% of the Lower Living Standard Income Level, or \$30,535 (for 2023). This figure is much more in line with eligibility for TANF, SNAP, heating assistance, and other supports. The result is that we are training many more low-income Rhode Islanders to help them access good quality jobs.

- **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 PY2023: (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 met throughout PY2023 to 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, June 2022, and (most recently) May 2024 with conditions related to maintaining proper firewalls and guardrails between the various roles and responsibilities under WIOA; pursue and receive local input into the work of the board; maintain compliance with federal rules and the Uniform Guidance, continue to meet state and local monitoring responsibilities, and continue to allocate funds to both local areas through a transparent allocation process.

The state continues to meet all of these conditions. The waiver has functioned without issue since its initial authorization in 2019. The members of the Local Area Advisory Committee meet regularly and are engaged in decision-making effecting the Greater Rhode Island local area; firewalls and internal controls are working as intended with board and staff taking reasonable precautions against real or perceived biases; the state remains in compliance with federal financial rules and expectations; state and local monitoring continues with regularity, and both local areas receive allocated WIOA funding through a transparent process that is consistent with federal regulations.

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 in August 2021 and reauthorized in June 2022 and May 2024. 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)

The percentage of smaller employers utilizing these waivers has increased steadily since the implementation of the waiver. In addition, the number of OJTs that smaller businesses have utilized has substantially increased in the past two program years.

In PY21 (the first year of the waiver) the percentage of OJT contracts issued that were utilized by businesses with under twenty employees was 30.7% In PY22, that percentage increased to 53.8%, and subsequently increased again in PY23 to 63.3%.

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, and in PY 2023, that percentage decreased to 18.2% of all WIOA Youth served statewide. Accordingly, the balance of ISY has not yet increased. The state believes this was a byproduct of unique circumstance, including limited opportunities for in-school outreach and programming in a post-pandemic environment. The state nonetheless remains committed to utilizing the flexibility granted by this waiver to promote innovative and flexible in-school service models.

- **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.

For PY2023, Rhode Island’s performance on these two metrics is as follows:

| Measure  | Rate   |
|--|--------|
| Retention with Same Employer in the 2nd and 4th Quarters After Exit Rate | 65.00% |
| Employer Penetration Rate  | 5.8%   |

On February 23, 2024, the USDOL and USDOE issued a new rule regarding the reporting of Effectiveness Serving Employers as part of required statewide Annual WIOA Reporting. Beginning with Program Year 2024 (July 1, 2024 – June 30, 2025); “Retention with the same Employer” will be the sole ESE metric under WIOA.

- **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 results of that effort were realized in PY2023. The various state agencies administering WIOA programs entered into a memorandum of understanding that authorizes cross program evaluations designed and informed by those agencies, as well as by the State Workforce Development Board. Completed evaluations, with associated findings and results, will be shared with state and local boards. As State Workforce Agency and administrative agent for the

State Workforce Development Board, the Department of Labor and Training serves 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.

In Spring 2024 the state completed 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 final report highlighted 'service deserts' of severe economic hardship that were not being reflected in our collective WIOA enrollment. The WIOA agencies are now in the process of strategizing on enhanced recruitment and awareness efforts in these communities. Given Rhode Island's small size; any progress in addressing employment barriers and in building economic security in these communities would have an outsized impact on statewide measures of economic stability and growth.

As the state completes additional WIOA evaluations; those assessments and any resulting actions, such as policy changes or adjustment in strategy, will be shared with partner federal agencies at the appropriate time. Furthermore, the state will continue to cooperate with federal requests for data or evaluation; and will make every reasonable effort to respond to such requests in a timely manner.

- **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 PY23 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. In PY23 RIDLT surveyed 804 unique Title I B clients with 66 unique responses.

To ensure further accessibility Rhode Island presented this survey, and Workforce outreach materials before Rhode Island's Office of Community Engagement (OCE) Partners for feedback. The Partners (made up of over 32 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.

During PY23 the OCE Partners dispersed a survey among their communities with questions directly related to the knowledge and accessibility of American Job Center services, as well as linguistic information, technology access, preference of service provision type (in person vs. remote), and employment demographics and employment goals. This survey resulted in one thousand four hundred and fifty-eight responses (1458). The OCE director and the RI DLT Data and Performance Director aggregated the responses and presented them to RI DLT leadership as well as the OCE Community Partners. The survey sparked open and ongoing dialogue supported by the data regarding how best to ensure that Rhode Island WIOA services continue to grow in accessibility and equity of eligibility.

