

## **Addendum to WIC performance responses, FY 17 - FY 18**

### **Question 17: contracts**

Question 17. Contracts. Please provide copies of the contracts with Kairos (two contracts) and Jeff Marcella; copies of all deliverables; copies of monitoring plans; copies of results of monitoring of each contract.

**A: The two Kairos contracts and Jeff Marcela contract are attached along with copies of FY17 deliverables. The WIC Contract Administrator for these contracts reviews the invoices and inspects work products submitted to confirm payments. DMPED's Contracts, Procurement and Grants department provides additional contract oversight and monitoring. The two contractors have been in compliance with all grant agreement terms in the areas assessed.**

### **Question 18: grants**

Question 18. Grants. Please attach copies of all monitoring plans and documentation of monitoring of each grantee.

**The WIC Contract Administrator for these grants reviews the invoices and inspects work products submitted to confirm payments. DMPED's Contracts, Procurement and Grants department provides additional contract oversight and monitoring. The contractors have been in compliance with all grant agreement terms in the areas assessed.**

## **Youth Services**

### **Question 40: WIOA implementation phases regarding youth services**

Provide a complete response to each subpart.

a) In Phase 1, "Referrals from locally funded youth programs (such as SYEP, Career Connections, and the Reengagement Center) to Title I Youth programs occur to increase enrollment, with a focus on Out-of-School Youth." Does the WIC track the number of referrals? Please provide data for FY16, FY17, and FY18, to date. What procedures or policies are in place to ensure this element is implemented? Are such policies and procedures fully operational?

**This new process will take place at the agency level through the Department of Employment Services. As this is a new process for FY18/ PY17, this year will serve as a baseline, and it will be reported to the system by DOES. The overall tracking of referrals is a deliverable of the newly acquired One Stop Operator, which is managed by the WIC.**

b) In Phase 1, "Enhance coordination between Title I, Title IV, and OSSE Youth programming, including: ensure youth with disabilities access Title I programs." What steps have been taken to implement this element? Is it fully operational?

**Coordination between Title I, Title IV, and OSSE Youth programming already exists through MOUs. Both Title IV and the OSSE Re-Engagement Center have MOUs with the Title I administrator. These MOUs have been enacted and partners actively meet to discuss potential program enhancements.**

c) In Phase 1, "Coordinate SYEP orientation for students and businesses to ensure that students with disabilities and businesses are aware of the supports available through RSA to support

youth with disabilities placement.” What procedures or policies are in place to ensure this element is implemented? Are such policies and procedures fully operational?

**DOES implements the Marion Barry Summer Youth Employment Program and, as such, coordinates and leverages a variety of intra-agency relationships to connect disabled youth to summer programs, additional resources and services.**

d) In Phase 1, “Coordinate referrals between DOES youth programming and the Reengagement Center and postsecondary support programming.” Please explain what steps have been taken to implement this element. Is it fully operational?

**An MOU has been in place between DOES and the Re-engagement center to provide referrals to youth and provide a variety of services, many of which fall under the 14 required WIOA elements. They are also on site at the AJC.**

e) In Phase 2, “Coordination between DOES, OSSE, DCPS and relevant DC Public Charter schools to ensure work experiences are aligned, where appropriate, with a student’s CTE program of study.” Please explain what steps have been taken to implement this element. Is it fully operational?

**Phase 2 will take place in FY18 and FY 19.**

## **Performance Management and Data**

### **Question 42: WIOA performance results**

Question 42. WIOA results. Provide separate results for all titles and all programs: WIOA title I adult, WIOA title I youth, WIOA title I dislocated worker, WIOA title II, WIOA title III, WIOA title IV. Please provide results for PY 16 in each program. Please provide the number (numerator and denominator, as well as total served) for each program. It does not matter that this information was not required by DOL; the committee has specifically requested that this information be provided.

**This is a baseline year therefore there was nothing for DOES to report.**

### **Question 50: priority of service requirements**

**A: Priority of Service requirements are outlined in the WIOA regulations and additional guidance is provided in the WIC WIOA policy manual and the DC WIGL 2017-001. DOES, as the administrative agent is responsible for implementation of the laws, regulations, and policies. The WIC has requested previously, from DOES information on how the requirements are being enforced.**

## **WIOA Compliance and the D.C. Code**

Please discuss the District’s compliance with the following provisions of WIOA and related D.C. Code.<sup>1</sup>

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<sup>1</sup> Note that references to WIA are deemed a reference to the corresponding provision of WIOA, as per D.C. Code § 32–1612.01. “(a) Except as otherwise specified, a reference in this subchapter to a section or provision of the Workforce Investment Act [WIA] of 1998, approved August 7, 1998 (112 Stat. 936; 29 U.S.C. § 2822), shall be

**Question 54 Selection of youth providers by the WIC.**

Provide full and complete responses to each subpart individually. The current text does not respond to the questions asked.

a. Does WIOA allow for any entity other than the WIC to award WIOA-funded youth grants and contracts? If so, please cite the provision providing that authority. **Not on its face, however, it has been interpreted that way by DOES.**

b. DOES has issued several WIOA-funded In-School Youth and Out-of-School Youth grants in FY17 and FY18. What role has the WIC played in developing the grant RFAs, including the scopes of work of the grants? What role has the WIC had in deciding grant recipients? What role does the WIC have in performance oversight of these grants? **The WIC has not played a role in developing any WIOA-funded In-School Youth and Out-of-School Youth grants in FY17 and FY18, the scopes of work of the grants, deciding grant recipients, or in in performance oversight of these grants.**

c. Is the District in full compliance with these provisions of law? Has the WIC identified eligible providers of youth workforce investment activities? Please provide a Yes/No response. **No.**

d. Please discuss how we are complying, including a list of any WIC-selected providers and any policies for the selection of youth providers by the WIC. **The proposed policy for selection of youth providers is attached.**

e. Please describe the specific role and actions of the WIC, delineating WIC staff and the WIC board, to achieve and maintain compliance, including oversight. **The WIC (Board and Staff) roles regarding the youth program are outlined in 20 CFR Part 681. The WIC Board Youth Committee meets regularly (as discussed in Question 41) and staff has drafted proposed policy for the youth program to implement DOL guidance issued on March 2, 2017.**

f. Please attach copies of any supporting documentation, including policies and monitoring reports. **DOES has provided any/all reports directly to DOL.**

If the District is not in full compliance with these provisions of law, please explain:

- In what ways the District is not in compliance; **There is a disagreement regarding the requirements of the law, and the WIC is currently seeking guidance on the issue.**
- Whether there are active plans to enter compliance; **and The WIC has begun the policy development process, which includes consulting with partners to ensure that proposals are workable and board approval.**
- What those planned steps are, including responsible parties, and the expected completion date. **The WIC plans to issue policy regarding the District youth program once agreed upon.**

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deemed to be a reference to the corresponding provision of the Workforce Innovation and Opportunity Act, approved July 22, 2014 (Pub. L. No 113-128; 128 Stat. 1425).”

**Question 55: Program oversight.**

Provide full and complete responses to each subpart individually, including subparts A, F, G, H, I, and J. The current text does not respond to the questions asked.

**The WIC is in the process of developing the guidelines by which the WIC will provide oversight of youth workforce investment activities, local employment and training activities in partnership with DOES. The Current WIGLs speak to the framework for the workforce system to operate and the administration of service delivery.**

**We jointly work with DOES to monitor and certify service delivery of these programs at the American Job Center.**

**Question 56: Dispersal of funds at the direction of the WIC.**

Provide full and complete responses to each subpart individually. The current text does not respond to the questions asked.

**Historically, DOES has always administered and distributed WIA and now WIOA funding. So, as the WIC and DOES transitions forward with new leadership discussions for more transparency and openness regarding the direction of the WIOA administrative agency and guidance will continue to move forward in FY18.**

**Question 57: Certification of American Job Centers by the WIC.**

provide full and complete responses to each subpart individually. The current text does not respond to the questions asked. The current text provides only links to criteria and blank applications. The question asked for a variety of information, including copies of the completed applications received by the WIC from the AJC's.

- a. Is the District in full compliance with these provisions of law? Please provide a Yes/No response. **No.**
- b. Have the District's AJC's been certified by the WIC? **No.**
- c. What was the deadline for certification of the AJCs? **June 30, 2017.** Did the District meet such deadline? **No.**
- d. Please describe the WIC's process for certification, including elements of assessment, and any actions taken regarding certification in FY17 and FY18 to date. **See DC-WIGL-2017-014-OneStopCertification.**
- e. Is each of the four current AJCs reviewed separately? **Yes.** Note the status of certification for each AJC. **Pending.**
- f. Please also attach copies of (1) applications received by the WIC and (2) materials produced by the WIC, including any written reviews, corrective actions required, or reports. **Attached are (2) two Directives regarding the One-Stop Certification.**
- g. Has the WIC established policies and procedures for the development of a one- stop delivery system? Please explain and attach such policies and procedures. **See WIC WIOA Policy Manual**  
**(<https://dcworks.dc.gov/sites/default/files/dc/sites/dcworks/publication/attachments/WIC-WIOA-Policy-Manual-May22.pdf>) and DC-WIGL-2017-012-AmericanJobCenterCommonIdentifier**

**(<https://dcworks.dc.gov/sites/default/files/dc/sites/dcworks/publication/attachments/DC-WIGL-2017-012-Common%20Identifier.pdf>)**

If the District is not in full compliance with these provisions of law, please explain:

- a. In what ways the District is not in compliance; **DC AJC's are in the process of being certified by the WIC.**
- b. Whether there are active plans to enter compliance; **Certification activities are underway.**
- c. What those planned steps are, including responsible parties, and the expected completion date; **Site visits to be conducted on each individual DC American Job Centers (AJC).**

**Question 59: WIA administrative entity**

Provide full and complete responses to each subpart individually. The current text does not respond to the questions asked. In addition, please provide the citation to the provision of law and/or other documentation demonstrating the assertion that US DOL monitors does for compliance with audit requirements in WIOA.

**Under section 32-1603.01 WIA administrative entity states, the Mayor shall designate an agency to serve as the WIA administrative entity, which shall work in partnership and cooperation with the WIC. Historically, DOES has always administered and distributed WIA and now WIOA funding. Link: <https://code.dccouncil.us/dc/council/code/sections/32-1603.01.html>**

**Question 60: cooperation between WIA administrative entity and the WIC.**

Provide full and complete responses to each subpart individually.

- a. "Develop the District's state plan;" **The WIC has led this activity.**
- b. "Negotiate the District's state performance measures as required under section 136(b) of the Federal Act [state performance measures];" **None.**
- c. "Develop the District's annual report as required under section 136(d) of the Federal Act [state performance report];" **None.**
- d. "Develop and submit all reports required under the Federal Act;" **The WIC has submitted the District's state plan and will submit the modification.**
- e. "Advise the Mayor and the Office of the Chief Financial Officer of the District of Columbia on the annual budget and spending plan for youth activities as described in section 129 of the Federal Act and employment and training activities as described in section 134 of the Federal Act." **None.**

**Question 61: WIC recommendations on laws or regulations**

Provide full and complete responses to each subpart individually. The current text does not respond to the questions asked.

**WIOA implementation continues to move forward. The laws currently in place created by the Mayor provides the WIC the proper framework to execute the operational functions of WIOA. Therefore, the WIC will not be submitting or recommending any amendments to DC Code.**

**Question 62: sector-based workforce development plans**

Provide full and complete responses to each subpart individually. The current text does not respond to the questions asked.

- a. **Demand Industry Council meetings were held in February through July of 2017, to align the needs of the six high demand sectors within the business community with those of adult education and post-secondary education assets to accelerate educational and career advancement of district residents via career pathways.**
- b. **The expansion of business advisory committees to represent all six high demand sectors, convening through the WIC has been implemented by way of sector based demand industry council meetings that addressed areas of critical concern to businesses, namely skills gaps and needed training opportunities to bridge those identified gaps in the workplace so that sustained employment is created and maintained through job creation and economic growth born of the work of a highly skilled workforce.**
- c. **The leveraging of business advisory committees training investments in the six high demand sectors through the awarding of sector based workforce development awards and grants that promote continuing education and training necessary for impacting sustained job creation in all sectors- this has been implemented.**

**Question 63: Employer engagement**

Provide a complete response.

**The WIC has engaged employers through demand Industry Council meetings, industry specific focus groups, and intermediary grant awards funding. The activities of the WIC board, its committees and staff continually and rightfully place the needs of businesses at the center of all workforce development strategies.**

**Question 66: system alignment**

please provide a status update on each subpart.

**The DC WIC and WIOA partner MOU's, have been signed and executed the first week in March 2018. The DC WIC policy staff, through the American Job Center One-Stop Operator will monitor the implementation of the MOUs for compliance and provide supplemental technical assistance as necessary.**

**Question 71 WIOA funding District-wide**

Please provide the funding for each agency and each WIOA title, including both state and local allocations. **The WIC has requested the information from DOES. In FY 16, DOL implemented a new performance system.**

**Question 72 WIOA funding received by the WIC**

Please provide a complete response to the entire question.

**Funding provided under WIOA must be allocated in accordance with the authorizing federal act WIOA public law (113-128) which provides the specific formulas for distributing WIOA**

**funds for states, in this case the District of Columbia. The federal act allocates a portion of each of the WIOA adult, Youth and dislocated worker funding streams for use by the Mayor for state-level initiatives. From these state-level funds, DOES allocates certain percentage of funds to the WIC for administrative and program costs. The inter-district transfer of this funding occurs through a process delineated out in MOU executed between the following parties DOES and DMGEO.**