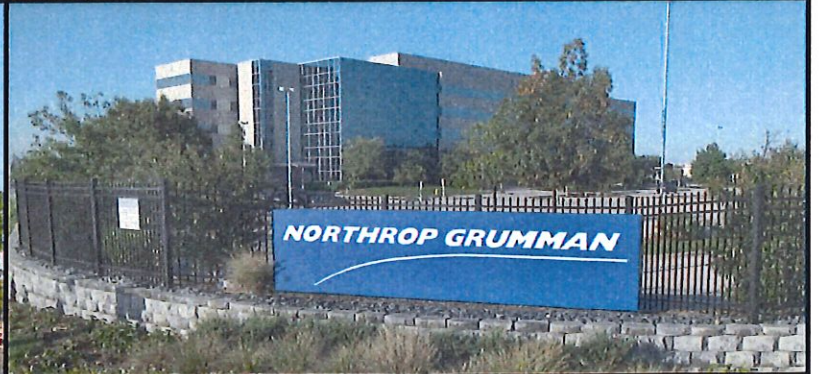


Workforce Innovation and Opportunity Act Local Plan

Anne Arundel County

2016 - 2020



Making Anne Arundel County
the Best Place



The Local Workforce Development Board for Anne Arundel County, Maryland certifies that it complies with all required components and assurances of the Workforce Innovation and Opportunity Act plan development guidelines issued by the State of Maryland. The Local Board also assures that funds will be spent in accordance with the Workforce Innovation and Opportunity Act, Wagner- Peysner Act, and their regulations, written U.S. Department of Labor guidance implementing these laws, Office of Management and Budget circulars, and all other applicable federal and state laws, regulations, and policies.

Local Chief Elected Official

Date

St. H. P. ...

3/27/19

Local Workforce Development Board Chair

Date

Walter ...

3.14.19

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Glossary

AACC – Anne Arundel Community College
AACCC – Anne Arundel County Career Center, a proud partner of the American Job Center network
AACPS – Anne Arundel County Public Schools
AAEDC – Anne Arundel Economic Development Corporation
AALWDB – Anne Arundel County Local Workforce Development Board
AACPL – Anne Arundel County Public Library
AACCAA – Anne Arundel County Community Action Agency
AAWDC – Anne Arundel Workforce Development Corporation
ABE – Adult Basic Education
AD – Adult Workers, anyone who is looking for training or employment
AJC – American Job Center
ALICE – Asset Limited, Income Constrained, Employed = “working poor” per United Way definition
CASAS – Comprehensive Adult Student Assessment Systems
CBO – Community-based organization
Client = individual seeking training and/or employment
CP – Career pathways
CSBG – Community Service Block Grant
Customer = Business
DLLR – Maryland Department of Labor, Licensing & Regulations
DOL – U.S. Department of Labor
DORS – Division of Rehabilitation Services
DSS – Department of Social Services
DW – Dislocated Worker, someone who lost a job to no fault to their own
EARN Maryland – Employment Advancement Right Now Maryland
FBO – Faith-based organization
GED – General Educational Development (High School Diploma)
GWDB – Governor's Workforce Development Board
HITCH – Hospitality, IT, Transportation, Construction, Healthcare industries
ITA – Individual Training Account
JWA – JobsWork!. Arundel, AAWDC's job readiness initiative with DSS
LMI – Labor Market Information
LWDB – Local Workforce Development Board
MHEC – Maryland Higher Education Commission
MOU – Memorandum of Understanding
MWE – Maryland Workforce Exchange
NEDP – National External Diploma Program
RFP – Request for Proposals
RR-Rapid Response
RSA – Resource Sharing Agreement
SNAP – Supplemental Nutrition Assistance Program
TABE – Test of Adult Basic Education
TANF – Temporary Assistance for Needy Families
UI – Unemployment Insurance
Wagner-Peyser – The 1933 law that created & funds the employment services offices

Introduction

The Workforce Innovation and Opportunity Act (WIOA) was signed into law on July 22, 2014, and went into effect July 1, 2015. WIOA supersedes the Workforce Investment Act of 1998, and amends the Adult Education and Family Literacy Act, the Wagner-Peyser Act, and the Rehabilitation Act of 1973. WIOA is designed to help both job seekers and businesses. WIOA addresses the needs of jobseekers through establishing a workforce system that helps them access education, training, and supportive services to gain employment and succeed in the labor market. WIOA also addresses business needs by matching them to the skilled workers they need to compete in the global economy.

In order to ensure Maryland’s effective implementation of the requirements of the new federal law, the WIOA partners agreed on the development and implementation of proven best practices and strategies towards system improvement. Anne Arundel County developed its own Local Workforce Development Plan that outlines the vision, objectives, and strategies for WIOA implementation in the Local Area.

This Plan is in line with the Maryland’s Combined State Workforce Plan, which has a vision of a Maryland where every person maximizes his or her career potential and businesses have access to the human resources they need to be successful.

The implementation of the Plan will also be governed by the principals outlined by County Executive Steuart Pittman as he strives to make Anne Arundel County the **best** place and states that he is “committed to building a transparent government that encourages community participation. Together, we will create empowered, healthy, safe, educated, thriving and sustainable communities in Anne Arundel County”.

Executive Summary

Anne Arundel County, Maryland is located in the Baltimore Region—consisting of Baltimore City, Anne Arundel, Baltimore, Carroll, Cecil, Harford, and Howard Counties. It is also adjacent to the Washington Metropolitan region that includes Montgomery and Prince George’s Counties. Both regions have a heavy concentration of government and government contractor jobs and Anne Arundel includes a large number of healthcare and professional & scientific services jobs. These industries provide over 1.2 million jobs and will create the largest demand for workers within the next 4 years. In total, the projected job demand in the top 10 largest industries in the region is about 40,000 jobs¹. In addition, demand in the classifications of arts and entertainment, management of companies, and transportation and warehousing is projected to grow in the very near future. Anne Arundel County includes rural, urban, and industrial areas providing opportunities for both Anne Arundel County businesses and individuals to grow and prosper but requiring government and workforce professionals to be innovative and thoughtful when developing service delivery programs.

The largest single concentration of jobs in the County is at and around Fort George G. Meade including the National Security Agency, the Defense Information Systems Agency, and the contractors that support their mission. Other significant employment hubs in the County include: The North County Industrial zone, the BWI Airport zone, the Arundel Mills zone, two regional hospitals, and the City of Annapolis. An estimated 159,000 jobs are located within these zones².

The Anne Arundel County Local Workforce Development Board (the Board) has decided to focus on the high growth industries of Hospitality, Information Technology, Transportation, Construction, and Healthcare (“HITCH”). These industries are projected to grow and create the greatest occupational demand in the Region:

Focus Industry	Subindustries	In Demand Certifications ³
Hospitality	Accommodation and Food Services, Retail and Entertainment	Automotive Service Excellence (ASE), Servsafe, Casino Gaming License, Registered Dietitian, Certified Pharmacy Technician, Bartender certifications
IT	Professional/Scientific/Information Technology	Security Clearance, Project Management, CISSP, CISCO, Security +, IT Infrastructure Library, Network +
Transportation	Transportation, Warehousing and Logistics	CDL Class A, Environmental Protection Agency Certification, Security Clearance
Construction	Construction and Manufacturing	Security Clearance, CISSP, SANS/GIAC, Project Management, Security +, Network +, OSHA
Healthcare	Healthcare and Social Services	Registered Nurse, First Aid CPR, Basic Cardiac Life Support, Certified Nursing Assistant, Nurse Practitioner, Caregiver, Phlebotomy

Even though the median household income in Anne Arundel County is very strong (over \$94,000) and the poverty rate for individuals is low (6%), there are populations that have substantial barriers to

¹ EMSI

² Anne Arundel Economic Development Corporation

³ Burning Glass

employment and lack a sustainable income. Among those groups are veterans, individuals with disabilities, out-of-school youth, long-term unemployed, low-skilled individuals, ex-offenders, and people receiving government assistance.

County Residents	Demographics
Population who don't have a High School Diploma	8.1%
Have a High School Diploma	24.2%
Higher than HSD but no BS degree	51.9%
Bachelor's degree or higher	40.1%
Veterans	
Veterans	12% of population of 18 years or older
Individuals with disabilities	
Individuals with disabilities	10.6%
Out-of-school youth ages 18-24	
Out-of-school youth ages 18-24	24,000 (47%)
Long-term unemployed (those who exhausted their UI benefits)	
Long-term unemployed (those who exhausted their UI benefits)	Over 3,000
Ex-offenders (parole and probation supervision)	
Ex-offenders (parole and probation supervision)	3,500
Older workers (50+)	
Older workers (50+)	34.4%
Working poor	
Working poor	3,241 people below poverty level are unemployed
TANF recipients	
TANF recipients	5,700
SNAP recipients	
SNAP recipients	40,000
Homeless	
Homeless	335

Source: 2017 ACS, DLLR, DSS.

To serve these segments of the population and make employment services beneficial to all County residents, the Anne Arundel County Workforce System takes a demand-driven approach that includes the following elements:

- **Engaging Businesses:** collaboration with businesses to determine local and regional hiring needs, design innovative initiatives and trainings that are responsive to those needs, and get candidates on a career path.
- **Work and Learn Training:** working with businesses to offer a variety of hands-on, work-based learning opportunities that create a pipeline of candidates with the experience and skills businesses require.
- **Smart Choices:** analysis of local and regional labor market data to drive in-demand services to businesses and candidates.
- **Measuring Matters:** continuous evaluation of trainings, employment, and earnings outcomes to ensure excellent services and positive economic impact.
- **Career Progressions:** collaboration with businesses and partners to design and deliver pathways that prepare candidates to reach their full career potential.
- **Opening Doors:** determination and addressing systemic barriers to employment.
- **Regional Partnerships:** leading in bring together partners to develop a strong regional economy.

The Board, whose members are appointed by the County Executive, drives and informs the development of the priorities and strategies of the system. The role of the Board is to align the workforce development

system and make sure the partners are working together to meet the needs of customers and clients, where businesses are customers and represent demand and clients are individuals and represent supply.

At the same time, the main goal of the Board is to narrow the gap between the supply of workers (individual clients) and business demand (business customers) by providing innovative workforce solutions. As a result, businesses will have a pipeline of skilled workers and individuals will have the skills to reach their full career potential.



The Board is representative of all the mandatory and non-mandatory partners and the membership includes representatives of growth industries in the county. The Board has set up four committees that work on specific topics and strategies. This structure allows the Board to be an effective convener of businesses, mandatory and non-mandatory partners, and the community with the objective of developing a strong and efficient workforce development system in the County.

Board committees are engaged in the oversight of the development of strategies and the performance of the WIOA partners. In particular, the committees oversee the performance and activities of the Career Centers, WIOA funding allocations, and policy development.

The Board developed a number of priorities that will govern and drive the Board's activities in the area. These priorities are:

- Providing oversight of the County's workforce funds to ensure wise usage leading to a greater return on investment
- Guiding business and industry solutions so County businesses remain competitive by hiring and retaining the talent essential to meet their current and future workforce needs
- Providing insights into the labor market that help County residents meet their full career potential by having the skills and credentials that meet the needs of local and regional businesses
- Ensuring that Anne Arundel County's most vulnerable residents receive the services they need to start on a career pathway that leads to self-sufficiency
- Engineering innovative solutions to address and mitigate the barriers to employment of County residents
- Overseeing the Anne Arundel County Career Center operations to ensure all visitors receive excellent customer service
- Developing demand-driven workforce development strategies, making Anne Arundel County a leader in demand-driven implementation
- Cultivating the Anne Arundel County workforce development system so that it leads to a positive economic impact on the local and regional economy, making Anne Arundel County the **best place**

In order for the system to be efficient and ensure that the demand has been met, the Board continues working in close collaboration with system partners. The Anne Arundel County Workforce Development system consists of the following partners (*Career Center required partners):

System Partners (Section 121 (1)(B) of WIOA)

Partner	Role
Anne Arundel Workforce Development Corporation*	Adult, Dislocated Workers, Youth services
Division of Labor and Industry of the Maryland Department of Labor, Licensing and Regulation*	Wagner-Peyser, Trade-Adjustment Assistance, Jobs for Veterans State Grants, Unemployment Insurance
Division of Rehabilitation Service*	The Vocational Rehabilitation program
Senior Services of America, Inc.	The Senior Community Service Employment Program
Anne Arundel County Public Schools	K-12, Technical education at the secondary level
Anne Arundel Community College	Adult Education and Literacy activities; training provider; Career and technical education programs at the post-secondary level
JobCorps	Job readiness services for youth
Anne Arundel County Community Action Agency	Community Block grant administrator and supportive services provider
The Housing Commission of Anne Arundel County	Employment and Training activities
Anne Arundel County Department of Social Services	TANF and SNAP
Local Management Board	Outreach and supportive services
Community-based organizations	Outreach and supportive services
Faith-based organizations	Outreach and supportive services
Anne Arundel Economic Development Corporation	Business Engagement
Anne Arundel County Public Libraries	Outreach and Service Delivery

* denotes Career Center required partners

Adult Basic Education is co-located with the other core partners at the new Career Center. In addition, the Board designates the Anne Arundel County Department of Social Services as an affiliate Career Center to offer services for clients receiving public assistance, (i.e. Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), and foster care youth).

The Board recognizes that the role of economic development is to create and retain jobs in the County, and the workforce development's role is to develop the talent to fill these jobs.

To ensure a highly effective service delivery system in the County, the Board created an Alignment Committee that includes representatives of all the system partners. The Anne Arundel Alignment Committee established a Career Center workgroup that will focus on integration and continuous improvement of Career Center services.

Under the demand-driven model, understanding the needs of businesses is a prerequisite for developing effective strategies. The Board will continue to utilize labor market research and analysis as well as information gathered by engaging businesses to learn about the workforce needs and trends. This will ensure that the service delivery system fully understands and meets the needs of customers. In addition,

since some workforce challenges are significant enough to impact an entire industry, the Board will continue addressing them by creation of industry sector partnerships, i.e. bringing together businesses, economic development, workforce development, education and training, government, labor, and community organizations focused on a particular industry within a local or regional labor market.

The Anne Arundel County Business Services Team is comprised of the Business Solutions Team of AAWDC and Business Service representatives from DORS, DLLR (including LVERs), AAEDC, and AACC. The Business Team conducts an array of services for businesses such as consultative business call programs, sourcing and recruitment strategies, talent management and development, incumbent worker training, and connection to other services to ensure Anne Arundel County businesses have the resources to continue to grow and thrive.

The Board will utilize a client-centric approach in providing services to job seekers/clients. The approach involves the extension of time individuals are engaged in the workforce development system and encourages the partners to develop innovative services to meet clients where they are to start, advance or, transition in a career path, address their barriers to employment, and ensure that they have essential workplace skills and industry certifications in order to meet their full career potential.

The Board wants to make sure that there are different training models that ensure the system meets the needs of businesses. The Board recommends a variety of approaches to skills enhancement to include but not limited to short-term occupational training, work and learn models (including apprenticeships), incumbent worker training, essential workplace skills training, and contextualized trainings.

The Board also recognizes the need to prepare an emerging workforce for starting on a career path and acquiring necessary education, skills, credentials, and experience. To facilitate the process and help youth to find their career, the Board will support a model that includes career exploration, essential skills training, occupational trainings that lead to credentials, and work experience opportunities.

In order to support the challenges that clients face in obtaining employment and training, the Board will ensure strong collaboration and alignment of supportive and wraparound services with partners with expertise in providing these services.

Whereas the Board agrees with the State's vision for putting people before performance, the Board will make certain that continuous improvement and analysis of performance is a priority for all programs. Development of initiatives and programs will be based on industry demand. Program activities and outcomes will be tracked and analyzed to uncover trends and evaluate efficiency and effectiveness of strategies. The Alignment Committee and the entire Board will review performance and labor market reports on a regular basis and will provide recommendations as to adjustments and improvements.

Through the development of the Local Plan, the Board strives to be an innovative leader in workforce development by utilizing labor market information to drive decisions and continuous improvement that leads to a positive economic impact on the local and regional economy.

Section 1: Economic Analysis

A. An analysis of the regional economic conditions including existing and emerging in-demand industry sectors and occupations; and the employment needs of businesses in those industry sectors and occupations. The analysis should identify local priority industries based on employer (and WIOA partner) input.

The region that Anne Arundel County is located in an area that consists of Baltimore, Anne Arundel, Howard, Carroll, Hartford, and Cecil Counties and Baltimore City. However, being adjacent to Montgomery and Prince George's counties, Anne Arundel County is also considered to be a part of the larger Washington metropolitan area. Both regions are heavily represented by government (military) organizations, their contractors, as well as healthcare and professional and scientific services. The estimated number of jobs in the Baltimore region in 2016 and projected change by 2020 are presented in the table. These industries provide over 1.2 million jobs. Also, most of them will create the largest demand for workers in the next 4 years. In total, the projected job demand in the top 10 largest industries in the region is approximately 40,000 jobs⁴. In addition, arts and entertainment, management of companies, and transportation and warehousing are also projected to grow in the next 4 years.

Industry in the Region	Regional 2017 Jobs	Regional 2017-2022 change	County 2017 Jobs	County 2017 - 2022 change
Government	286,523	1,515	94,784	2,472
Health Care and Social Assistance*	218,528	18,161	31,993	4,231
Retail Trade	140,918	(1,673)	34,610	967
Professional, Scientific, and Technical Services*	124,205	7,425	26,947	1,502
Accommodation and Food Services*	113,673	4,635	29,756	1,687
Administrative and Support and Waste Management and Remediation Services	93,835	5,540	17,190	730
Construction*	86,482	2,495	19,103	986
Other Services (except Public Administration)	67,281	2,951	13,884	790
Educational Services	65,614	7,203	4,152	359
Manufacturing*	59,631	988	12,136	(187)

Source: EMSI

*Industries identified by the State Plan as targeted.

The same industries represent the top industries in Anne Arundel County. The only exception is transportation and warehousing which replaces educational services on the list. The government industry, specifically the National Security Agency and Fort George G. Meade campuses, is the largest employer in the County – about 40,000 people are employed by companies and organizations that are located on those campuses and associated with its activities. Other economic drivers and employment hubs in the local

⁴ EMSI

area are the North County Industrial Zone, BWI Airport area, Arundel Mills, two regional hospitals, and the City of Annapolis. An estimated 159,000 jobs are created within these zones⁵.

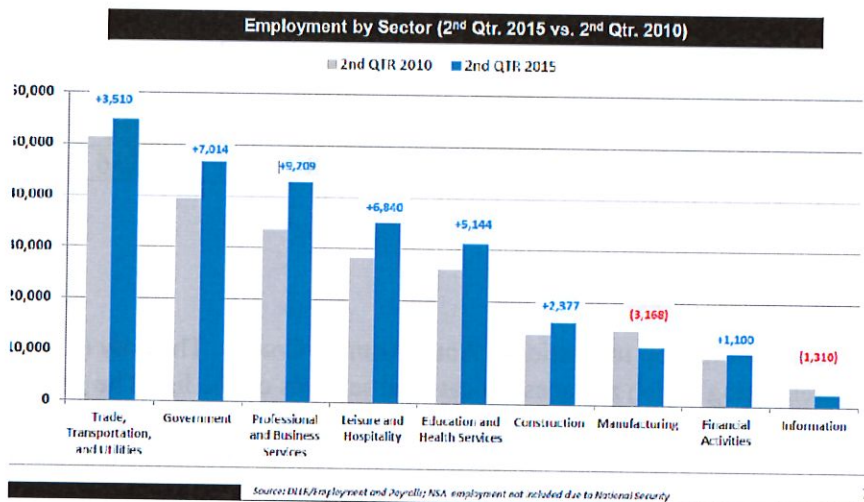
Being the capital of Maryland and housing many state government agencies, the City of Annapolis is one of the most important economic drivers and employment hubs. During the summer months, the City employers posted 3,000 job openings and there are 1,120 (5.1% Unemployment Rate) of residents who are looking for job. In addition, there are 7.7% of the City residents who live below poverty level and there are 70% of population ages 25-64 who have at least some college or associate's degree. The top five industries with vacancies are Retail, Healthcare, Finance, Accommodation and Food Services, and Professional and Scientific Services. The top five certifications that employers are requiring in those openings are registered nurse, real estate certification, certified public accountant, project management certification, and CDL Class A. In addition, over a hundred openings require candidates to have security clearance.

Some of the high-growth industries have the highest concentration of employees in Anne Arundel County compared to the national trends, and include government; professional, scientific, and technical services; construction; accommodation and food services; and transportation and warehousing. The Board will pay particular attention to analyzing trends and providing employment services to those individuals who intend to pursue a career in these industries.

Looking at the occupations within industries will help to define the skills and education needed to be employed in these industries. The top 10 occupational families representing jobs that workers in high growth industries occupy and their average hourly wages are as follows: Food Preparation and Serving (\$10.47), Office and Administrative Support (\$18.14), Sales and Related (\$16.05), Transportation and Material Moving (\$18.15), Construction and Extraction (\$21.04), Healthcare Practitioners and Technical (\$38.39), Management (\$52.00), Personal Care and Service (\$11.38), Building and Grounds Cleaning and Maintenance (\$12.22), and Business and Financial Operations (\$34.14) Occupations⁶.

Employment Growth Projections by Industry

- Anne Arundel County has a diversified employment base. Seven of nine industry categories expanded employment since 2010.



⁵ Anne Arundel Economic Development Corporation

⁶ EMSI

Based on the above, the Board which includes businesses and partner agencies decided to concentrate on industries that are projected to grow in the region and the local area:

Hospitality (Accommodation and Food Services, Retail and Entertainment);

IT (Professional/Scientific/IT);

Transportation (Transportation, Warehousing and Logistics);

Construction (Construction and Manufacturing); and

Healthcare (Healthcare and Social Services).

These will be referred to as “**HITCH**” industries.

In addition, the Board will place extra emphasis on occupations, specifically the mid-skill and high-skill occupations, which are projected to grow within these high-growth industries.

Utilizing labor market information, this list will be revised every year to reflect any changes in the local and regional economy.

Section 2: Strategic Planning to Maximize the Earning Capacity of Marylanders

Anne Arundel County Workforce Development Board fully supports the concept and principles of the Benchmarks for Success approach to measuring the impact of the workforce development activities in the county. The approach calls for establishing an integrated system of data collection and reporting and the Anne Arundel County Board will be working with all the Local Partners to accomplish this goal.

A. An analysis of the knowledge and skills needed to meet the employment needs of the businesses in the Local Area, including employment needs in in-demand industry sectors and occupations.

Understanding occupations' characteristics within industries will help to define the skills and education needed to be employed in these industries. The top 10 occupational families representing jobs that workers in high growth industries occupy and their average hourly wage are: Food Preparation and Serving (\$10.47), Office and Administrative Support (\$18.14), Sales and Related (\$16.05), Transportation and Material Moving (\$18.15), Construction and Extraction (\$21.04), Healthcare Practitioners and Technical (\$38.39), Management (\$52.00), Personal Care and Service (\$11.38), Building and Grounds Cleaning and Maintenance (\$12.22), and Business and Financial Operations (\$34.14) Occupations⁷.

At the same time, the highest demand in Anne Arundel County is observed for the following occupations: Computer and Mathematical, Sales, Office and Administrative Support, Management, Healthcare Practitioners and Transportation and Warehousing. Occupations that require a bachelor's degree are in highest demand⁸.

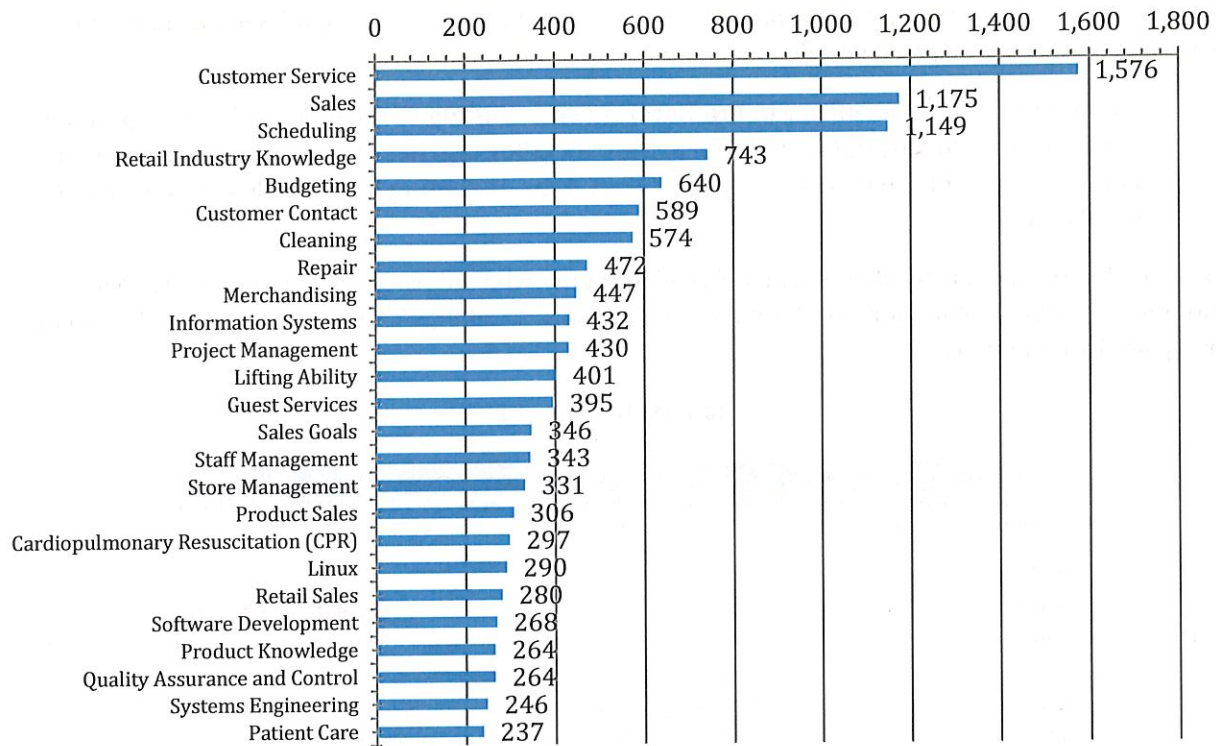
The skills that businesses ask for when looking for new employees includes essential skills, sales, mathematics, repair, LINUX, accounting, store management, and JAVA. Essential Workplace Skills required by the employers representing the HITCH industries are presented below:

⁷ EMSI

⁸ Burning Glass

Essential Workplace Skills required by businesses within HITCH industries

number of job postings within the last 90 days in AA county



Source: Burning Glass

In addition to education, many businesses require individuals to have industry recognized credentials, certifications, and hands on experience. The following certifications are in greatest demand by Anne Arundel County businesses: Security Clearance, CDL Class A, Registered Nurse, Certified Information Systems Security Professional (CISSP), First Aid SPR, Cisco Certified Network Associate, Security +, Project Management Certification, Certified Public Accountant.

Focus Industry	Subindustries	In Demand Credentials/Certifications ⁹
Hospitality	Accommodation and Food Services, Retail and Entertainment	Automotive Service Excellence (ASE), Servsafe, Casino Gaming License, registered dietitian, certified pharmacy technician, bartender certifications
IT	Professional/Scientific/IT	Security Clearance, Project Management, CISSP, CISCO, Security +, IT Infrastructure Library, Network +
Transportation	Transportation, Warehousing and Logistics	CDL class A, Environmental Protection Agency certification, Security Clearance
Construction	Construction and Manufacturing	Security Clearance, CISSP, SANS/GIAC, Project Management, Security +, Network +, OSHA
Healthcare	Healthcare and Social Services	Registered Nurse, First Aid CPR, Basic Cardiac Life Support, certified nursing assistant, nurse practitioner, caregiver, phlebotomy

⁹ Burning Glass

Source: Burning Glass.

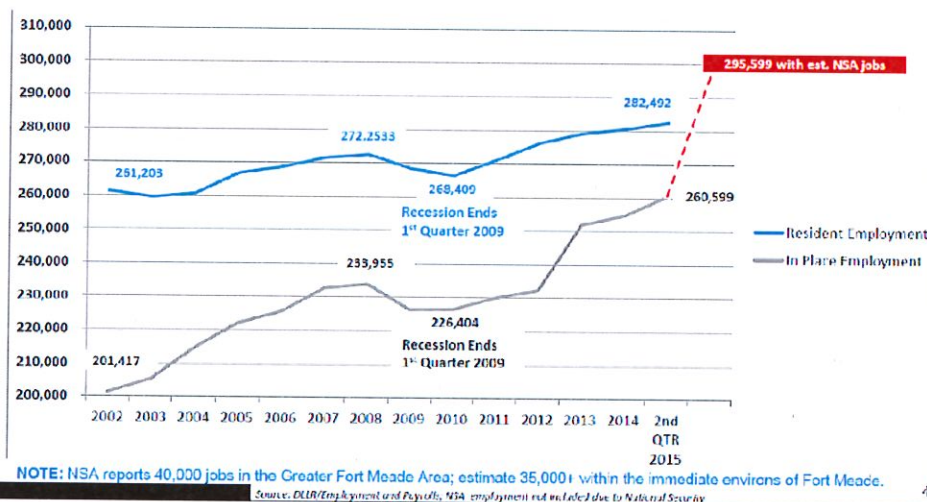
All the partners in the system will be working together to increase job-seekers' skills and knowledge, which will in turn increase their chances to find family sustaining jobs and careers. Partners will be guided by the Benchmarks for Success developed by the State and will utilize the calculations methods identified by the State Data and Dashboard Committee. Anne Arundel County workforce partners will strive to achieve benchmarks determined by the State Steering committee.

B. An analysis of the workforce in the Local Area, including current labor force employment (and unemployment) data, and information on labor market trends, and the educational and skill levels of the workforce in the Local Area, including individuals with barriers to employment.

There are 300,000 people residing in Anne Arundel County who are part of the labor force (either working or actively looking for work). Of those individuals, 11,000 (3.7%) are unemployed. The labor force participation rate is 71%.

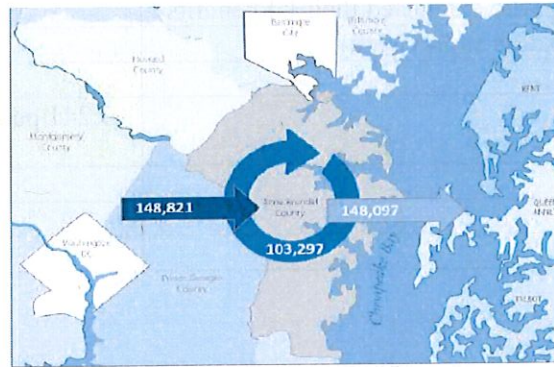
Employment Trends

- Anne Arundel County gained 5,840 jobs in the first six months of 2015. There are over 295,000 jobs at businesses and institutions within the County. Over 282,000 residents work throughout the Washington-Baltimore region.



The majority (51%) of County residents spend between 15 and 35 minutes commuting to work, 12.1% spend more than 60 minutes commuting. Commuting patterns for the County show that around 40% of the labor force work outside of the County and Anne Arundel County businesses and other establishments bring around 40% of their employees from outside of the County.

Commuting Patterns

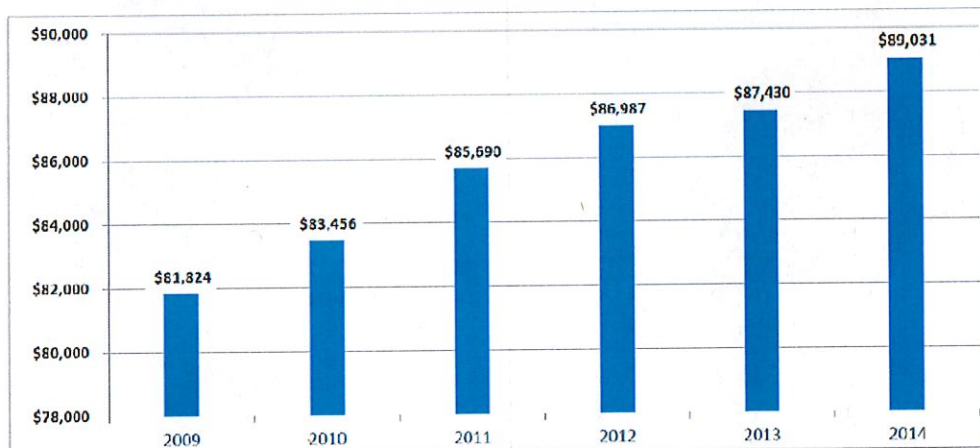


Source: Bureau of Census

Even though the median household income in Anne Arundel County is relatively high (over \$94.5K) and poverty rate is low (3.9%)¹⁰, there are population segments that have substantial barriers that prohibit a sustainable income. Among those groups are veterans, individuals with disabilities, out-of-school youth, long-term unemployed, ex-offenders, and people receiving government assistance.

Median Household Income

- Maryland ranks #1 in the Nation for Median Household Income
- Anne Arundel County ranks #5 in Maryland for Median Household Income
- Anne Arundel County ranks 26th in the Nation for Median Household Income



Source: US Census, American Community Survey (estimate)

10

County Residents	Demographics
Population who don't have a High School Diploma	8.1%
Have a High School Diploma	24.2%
Higher than HSD but no BS degree	51.9%
Bachelor's degree or higher	40.1%
Veterans	12% of population of 18 years or older
Individuals with disabilities	10.6%

¹⁰ 2017 American Community Survey

C. An analysis of the workforce development activities (including education and training) in the Local Area, including an analysis of the strengths and weaknesses of such services, and the capacity to provide such services, to address the identified education and skill needs of the workforce and the employment needs of employers in the Local Area.

There are three types of organizations that comprise the workforce development system in Anne Arundel County.

The majority of employment services in the County are being provided by Anne Arundel Workforce Development Corporation (AAWDC) and Department of Labor and Licensing Regulation (DLLR). Some programs are also provided by Division of Rehabilitation Services (DORS), and community-based and faith-based organizations. The programs conducted by community and faith-based organizations are not comprehensive and a further analysis needs to be conducted to collect information on their outcomes.

There is also an array of training providers not located in the County, that also serve County clients. There are only five training providers in the County that are on the Eligible Training Provider List and 31 programs. However, only 4 programs have information on their completions and other outcomes as well as the outcomes for the WIOA funded portions of those programs. The Area is working on developing its own ETPL.

There are a number of organizations that provide wrap-around and supportive services and refer clients to workforce providers. At the same time, workforce providers refer their clients to these service providers. These providers include DORS; Arundel House of Hope; Anne Arundel County Department of Social Services; Light House Shelter; Anne Arundel County Partnership for Children, Youth and Families; Anne Arundel County Department of Health; YMCA; Arundel Lodge; MD Cash; Seedco; Community Action; Behavioral Health Bureau of Anne Arundel County Department of Health; Arundel Community Development Services; and other county agencies and local organizations.

A gap analysis that will look at the number of graduates and the number of people being trained and educated for jobs in targeted industries will be conducted in the next year. A comprehensive database of all training and service providers will be developed on the basis of Info Anne Arundel, which contains supportive and wrap-around service providers and is scheduled to be updated in the nearest 2 years.

Creation of a system that tracks partner activities will allow for the development of a comprehensive gap analysis and develop strategies for increased efficiency of service delivery and addressing needs of job-seekers.

D. A description of the Local Board's strategic vision and goals for preparing an educated and skilled workforce (including youth and individuals with barriers to employment), including goals relating to the performance accountability measures based on primary indicators of performance described in Section 116(b)(2)(A) of WIOA in order to support Local Area economic growth and economic self-sufficiency.

The Board's vision is to ensure that Anne Arundel County businesses have a pipeline of skilled workers and that County residents have the skills needed and to reach their full career potential. To carry out this vision, the Board has adopted a demand driven strategy that focuses on the following elements:

- **Engaging Businesses:** collaboration with businesses to determine local and regional hiring needs, design innovative initiatives and trainings that are responsive to those needs, and get candidates on a career path.

- **Work and Learn Training:** working with businesses to offer a variety of hands-on, work-based learning opportunities that create a pipeline of candidates with the experience and skills businesses require.
- **Smart Choices:** analysis of local and regional labor market data to drive in-demand services to businesses and candidates.
- **Measuring Matters:** continuous evaluation of trainings, employment and earnings outcomes to ensure excellent services and positive economic impact.
- **Career Progressions:** collaboration with businesses and partners to design and deliver pathways that prepare candidates to reach their full career potential.
- **Opening Doors:** determination and addressing systemic barriers to employment.
- **Regional Partnerships:** leading in bring together partners to develop a strong regional economy.

By focusing on these elements, the Board will remain a high performing system meeting or exceeding the performance indicators described in Section 116(b)(2)(A) of WIOA and have a positive economic impact on the local and regional economy.

Section 3: Strategic Planning to Strengthen the Local Workforce System

The fifth Strategic Goal of the *Benchmarks of Success* is to strengthen and enhance the effectiveness and efficiency of Maryland's workforce system.

- A. Taking into account analyses described in Section 2, a strategy to work with the entities that carry out the core programs to align resources available to the Local Area, to achieve the strategic vision and goals.**

The Board that includes representation from all core partners and targeted industries (Attachment 1) developed the following priorities to carry out the core programs, align resources, and to achieve the strategic vision and goals:

- Provide oversight of the County's workforce funds to ensure wise usage leading to a greater return on investment
- Guide business and industry solutions so County businesses remain competitive by hiring and retaining the talent essential to meet their current and future workforce needs
- Provide insights into the labor market that help County residents meet their full career potential by having the skills and credentials that meet the needs of local and regional businesses
- Ensure that Anne Arundel County's most vulnerable residents receive the services they need to start on a career pathway that leads to self-sufficiency
- Engineer innovative solutions to address and mitigate the barriers to employment of County residents
- Oversee the Anne Arundel County Career Center operations to ensure all visitors receive excellent customer service
- Develop demand driven workforce development strategies including sector strategies, making Anne Arundel County a leader in demand driven implementation
- Cultivate the Anne Arundel County workforce development system so that it leads to a positive economic impact on the local and regional economy, making Anne Arundel County **the best place**.

To ensure goals are met, the Board also created four committees with the following objectives:

Governance Committee:

- Create a financially sustainable system
- Develop an asset map of all the services in the area
- Review performance and perform analysis on a regular basis
- Review and analyze labor market information
- Review and approve policies

Alignment Committee (includes Career Center work group):

- Oversee the Anne Arundel County Career Center operations to ensure all visitors receive excellent customer service
- Partner with Wagner-Peyser, Adult Education, and Vocational Rehabilitation to ensure implementation/enhancement of a career pathways model

Business and Industry Engagement Committee:

- Replicate industry sector strategies
- Define the biggest need, in particular develop a plan for addressing transportation issues
- Develop recruitment strategies that better match targeted populations to careers
- Partner with local agencies and organizations to perform outreach to targeted populations and support them post hire
- Focus on small business
- Take a closer look at the social aspects and culture of a company
- Develop better onboarding of businesses to the workforce system
- Pay attention to business cycles and interject innovative solutions to address the cycle and make connection between businesses
- Screen clients on barriers to meet the demands of industry
- Share best practices across industries

Targeted Population Committee

- Identify areas where targeted populations are clustered
- Partner with Industry Engagement Committee to utilize knowledge of occupational needs and career pathways
- Identify skills gaps and training needs of targeted populations
- Identify through focus groups the specific needs of the populations (initial focus placed on individuals with disabilities and youth)
- Develop barrier removal strategies
- Create an asset map to identify available resources and pre-existing strengths of the community to address the multitude of needs the targeted populations face
- Partner with the Career Center work group to ascertain best practices to address the population mindset of addressing short term goals vs long term goals
- Collaborate with inter-/intra- partners, local agencies and organizations to leverage and share resources to reduce the offering of duplicative services

B. A description of the workforce development system in the Local Area that identifies the programs that are included in that system and how the Local Board will work with the entities carrying out workforce development programs identified in the State Plan. The description should also include how the Local Board and the programs identified plan to align and integrate to provide services to customers. The description should also include programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.).

Detailed roles and responsibilities are described in MOU signed by all the required partners.

The Alignment of functions and activities conducted by each program will be ensured through work of the Alignment Committee which includes representative from all Partners of the County Workforce Development System.

Workforce Innovation and Opportunity Act (WIOA) Adult and Dislocated Workers

These services target individuals who have either lost their jobs through no fault of their own (Dislocated Workers) or individuals who have been chronically unemployed or underemployed and represent a

targeted population (Adults). Through the intake process and using state-of-the art assessment tools, these populations will be segmented and assigned to Career Coaches and/or Population Navigators that specialize in working with these populations. Career Coaches/Navigators will develop individualized, customized plans for the clients that will include activities that align with the client's career goals; address any potential barriers; identify training that leads to certifications; work and learn activities; job readiness activities; and connecting them with employment opportunities.

WIOA Youth

The Board will focus services on out-of-school youth along with serving in-school youth (specifically seniors) who are not on a post-secondary education path.

Using strategies that include career exploration, the Board will partner with businesses to host educational events for youth to get a better understanding of the high-growth industries and the high-demand occupations. With better knowledge of the industries, there will be an increase in commitment to establishing a career path in a preferred high-growth industry.

The Academy model will create a systemic process for youth to successfully enter a career path that will lead to more family sustaining wages. The Academies will be industry-specific and will incorporate mentorship; contextual learning for youth with low literacy skills; access to GED instruction and testing (*if warranted*); internships and other work and learn activities; job readiness instruction; occupational training leading to industry recognized certification(s); apprenticeship opportunities; and access to employment.

In-school youth will focus on career exploration, job readiness and internships (i.e. Summer Jobs).

Wagner-Peyser

Wagner-Peyser staff and the Board meet regularly as Career Center services staff to discuss client need, new resources in the community, and ongoing education regarding targeted populations. A new client flow system which includes a universal intake system will improve the determination of client need. Individuals seeking assistance with updating their resume and connection to employment will be the focus of Wagner-Peyser. Wagner-Peyser will offer workshops on resume writing, interviewing skills, and other job readiness instruction that all clients can access.

Improved client assessment will identify the need for training and more customized services. Wagner-Peyser staff will have universal checklists that confirm the need to refer the client to WIOA Adult or Dislocated Worker services.

Adult Education & Family Literacy Act Program

Anne Arundel Community College (AACC) works with the Board to provide industry-specific occupational training. Working with businesses who lead the development of curriculum, AACC will partner with the Board to identify training strategies that meet business demand in high-demand occupations.

In addition, AACC and the Board will develop contextual learning models for individuals with low literacy skills. These models marry math and English instruction with industry-specific training which improves the overall outcome for this client-base.

The Division of Rehabilitation Services (DORS)

The Division of Rehabilitation Services (DORS) will provide ongoing training regarding the specific issues and needs of their client-base. The universal intake system will ensure that clients are referred to services that meet their specific needs.

Working with DORS staff, the Board will ensure that workshops, assessments, and other activities take into consideration the needs of individuals with disabilities (i.e. hearing impaired) to ensure successful universal access. DORS will work with the local board to ensure that all training vendors incorporate special needs with respect to instruction to ensure this client-base are able to equally participate in opportunities that lead to employment.

Temporary Assistance for Needy Families (TANF)

The Department of Social Services (DSS) refers individuals on public assistance or foster youth to AAWDC for employment assistance. Through both the Temporary Assistance for Needy Families (TANF) and Supplemental Nutrition Assistance Program (SNAP) programs, clients will work with an Intake Specialist to assess job readiness (entry-level versus mid-career), barriers to employment, and other issues specific to this client-base. The Intake Specialist will determine client opportunities that align with other initiatives (i.e. Industry-focused WIOA training). In this case, clients will be co-enrolled and funding will be braided to support the client entering into a career path that leads to a family sustaining wage.

A partnership between the Caseworker (DSS) and the Youth Career Coach (WIOA) will ensure foster youth clients receive support with their daily living challenges as well as assistance with career exploration, job readiness, and job attainment. This support is critical to the success of foster youth and provides a client-centric experience that prevents the youth from failing or getting lost in the system.

Trade Adjustment Assistance for Workers Program

The program provides aid to eligible workers who lose their jobs, or whose hours of work and wages are reduced, as a result of increased imports or production transfers abroad. The Trade Program, which is considered to be part of Maryland's WIOA System, is a federal program that offers a variety of benefits and services to workers whose employment has been adversely impacted by foreign trade. Through a number of benefits and services, the Trade Program provides trade-affected workers with opportunities to obtain the support, resources, skills, and credentials they need to return to the workforce in a good job. These include employment and case management services, training, job search allowances, relocation allowances, reemployment and Alternative/Reemployment Trade Adjustment Assistance (ATAA/RTAA) wage subsidies for older workers, and income support in the form of Trade Readjustment Allowances (TRA). The TAA State Merit Staff reviews and makes the final determination on the retraining plan, ensuring it meets the federal requirements under the Trade Act. The Trade Act program is administered, staffed and implemented by DLLR, local workforce areas, and the Unemployment Insurance Division.

Jobs for Veterans State Grant Program

Through collaboration with Veterans Employment and Training Service (VETS), DLLR administers the Jobs for Veterans State Grant (JSVG) Program, which allows for veterans with significant barriers to employment to receive tailored employment and training services.

If veterans require additional skills necessary to obtain employment in the civilian world, they are being referred to Career Center staff and supportive services providers. This process has been smooth in sharing resources, data, and expertise; the Board will continue this strategy. At the same time, the Board will

continue improving the mechanisms of engaging Local Veterans Employment Representatives into its work with local businesses.

Reintegration of Ex-offenders program

To prepare individuals to re-enter the community with hard and soft skills that are in line with the needs of businesses, the Board will provide the following services to the ex-offender population: inmate assessment for job readiness, occupational skills, criminogenic needs and barriers; case management; customized job matching; training opportunities; placement and follow up services.

In addition to programs described above, the Board identified the following partners and programs to make up the Local Workforce System.

Carl D. Perkins Career and Technical Education Act

The Carl D. Perking Career and Technical Education Act provides funding for career and technical education at the secondary and post-secondary levels. The Anne Arundel County Public School (AACPS) Coordinator of Career and Technology Education and the Anne Arundel Community College (AACC) Dean, Continuing Education and Workforce Development were both appointed by the County Executive to serve as a member of the Board.

To ensure that Career and Technology Education is in line with the workforce development priorities and addresses business needs, AACPS will work closely with the Board to analyze data, identify employment opportunities in growth industry sectors, and design programs to align secondary and post-secondary training opportunities in high demand industries. In addition, this information will be shared with each Program Advisory Council (PAC) when making program specific decisions. This broad county-wide review coupled with the specific program review will provide counsel and guidance related to career and technology programs at both the secondary and postsecondary level, identify new educational opportunities, and identify avenues for expanded partnerships between education and industry.

Anne Arundel Economic Development Corporation (AAEDC)

Anne Arundel Economic Development Corporation (AAEDC) supports business and serves as a catalyst for business growth in Anne Arundel County thereby increasing job opportunities, expanding the tax base and improving quality of life.

Senior Services of America, Inc.

Senior Services of American, Inc. is committed to making it possible for low-income and other disadvantaged older adults to participate fully in determining their own future and the future of their communities. Senior Services of America, Inc. runs the Senior Community Service Employment Program (SCSEP), which is the largest federally-funded program specifically targeted to older adults seeking employment and training assistance.

Job Corps

Job Corps is a no-cost education and vocational training program administered by the U.S. Department of Labor that helps young adults ages 16 through 24 improve the quality of their lives through vocational and academic training. The program provides job readiness for youth to enable them to find gainful employment.

The Anne Arundel County Community Action Agency

The Anne Arundel County Community Action Agency provides services to empower, educate, coordinate and assist qualified people, including families, youth, children, the disabled and seniors in reducing poverty and building a better life for themselves. The Agency conducts job readiness workshops as well as summer jobs program for children. It provides wrap-around and supportive services for individuals as well as play an outreach role in the workforce system.

The Housing Commission of Anne Arundel County

The Housing Commission of Anne Arundel County is dedicated to strengthening communities and improving the lives of Anne Arundel County citizens focusing on the ownership, management, sustainability and preservation of affordable housing. The Commission provides supportive services to clients of the workforce development system.

The Anne Arundel County Partnership for Children, Youth and Families (Local Management Board).

The Governor's Office for Children charged the Partnership to convene a collaborative board to manage the implementation of a local, interagency, community based human service delivery system for children, youth and families. Partnership funded activities are driven by the needs in the community. The focus areas include: Prevention Service; Mental Health Services; School Completion; Outcomes, Measures, and Evaluations; Community Resourcing.

Community and faith-based organizations

Community and faith-based organizations provide wrap-around and supportive services to disadvantaged populations. Through their activities and programs they perform an outreach function for the entire system through a referral process.

System Partners (Section 121(b)(1)(B) of WIOA)

Partner	Role
Anne Arundel Workforce Development Corporation (AAWDC)*	Adult, Dislocated Workers, Youth services
Maryland Department of Labor, Licensing and Regulations; Division of Labor and Industry *	Wagner-Peyser, Trade Adjustment Assistance, Jobs for Veterans State Grants, Unemployment Insurance
Division of Rehabilitation Service*	The Vocational Rehabilitation program
Senior Services of America, Inc.	The Senior Community Service Employment Program
Anne Arundel County Public Schools	K-12, Technical education at the secondary level, National External Diploma, Carl Perkins program
Anne Arundel Community College	Adult Education and Literacy activities; training provider; Career and technical education programs at the post-secondary level
JobCorps	Job readiness services for youth
Anne Arundel County Community Action Agency	Community Block grant administrator and supportive services provider
The Housing Commission of Anne Arundel County	Employment and Training activities
Anne Arundel County Department of Social Services	TANF and SNAP

Local Management Board	Outreach and supportive services
Community-based organizations	Outreach and supportive services
Faith-based organizations	Outreach and supportive services
Anne Arundel Economic Development Corporation	Business Engagement
Anne Arundel County Public Library (partner not mentioned in WIOA)	Outreach and awareness

* denotes Career Center required partners

C. A description of how the Local Board, working with the entities identified in A, will expand access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment, including how the Local Board will facilitate the development of career pathways and co-enrollment, as appropriate, and improve access to activities leading to a recognized postsecondary credential (including a credential that is an industry-recognized certificate or certification, portable, and stackable).

The Board established a Workforce System Alignment Committee that consists of all the partners identified in A that will be charged with ensuring that access to employment, training, education, and supportive services for all clients is expanded with special emphasis on individuals with barriers to employment. Among the tools to be used to ensure access are common referral process, sharing data and information, common staff trainings geared to increase awareness of all initiatives amongst all partners and constant evaluation to ensure continuous improvement.

The Board also established the Business Engagement Committee which is tasked with creating career pathways that will include co-enrollment of participants from various programs outlined in A, and within high growth industries that lead to industry-recognized credentials that are portable and stackable. The Board supports the synergy between industry partnerships and career pathways, which ensures that there is a system and support that allows a client to step on a career pathway at any on-ramp and proceed to the next level. Industry partnerships inform and drive the building of career pathways, which include decision-making regarding trainings and other skills enhancement models; and lead to work and learn opportunities, and ultimately to unsubsidized employment.

The Alignment group will maintain and enhance a referral process that would ensure that enrollment is done in an efficient and effective manner and include common intake process and sharing of information. The Board will consult with National subject matter experts to design career pathways in each occupation and industry and ensure that those credentials include industry recognized certifications which are portable and stackable.

D. A description of the steps taken by the Local Board to engage entities identified in A in the formulation of its Local Plan.

The Board conducted individual meetings with each mandatory partner's leadership to discuss future integration of services and development of the Local Plan. In addition, representatives from AACC, AAWDC, DORS, Public Schools, DLLR, DSS, and businesses created a local Alignment Committee whose objective is to develop the Local Plan and monitor its implementation. The committee reviewed and approved subsections of the plan.

E. Description of the strategies and services that will be used in the Local Area:

○ **To facilitate engagement of businesses, including small businesses and businesses in in-demand industry sectors and occupations, in workforce development programs.**

The Business Engagement Committee of the Board oversees the creation and performance of an integrated business services team, the “Anne Arundel County Business Services Team” (the Team), representing the key partners identified in Section 3B to ensure business outreach and service delivery is coordinated and efficient. The Board will direct the Team to create a strategy to ensure that they are providing services to businesses small, mid-size, and large which fall into the targeted industry sectors (HITCH).

The Team is comprised of Local WIOA Business and Industry Solutions staff, Anne Arundel Economic Development, DLLR (Wagner-Peyser) staff, Local Veteran Employment Representatives (LVER), Department of Commerce, Division of Rehabilitation Services (DORS), and other agencies engaging businesses to source talent. This team ensures coordination, collaboration and data sharing minimizing duplication of outreach to the same business. Each team member will be cross-trained in understanding each program’s services to the business customer.

To facilitate engagement with businesses, the Team will:

- Initiate a consultative business call program to gain better understanding of businesses’ workforce needs and challenges.
- Conduct roundtables to bring businesses together to facilitate discussion around workforce challenges within a particular industry locally or regionally.
- Establish industry sector partnerships in “HITCH” industries to develop strategies and solutions to address the challenges within a particular industry. Sector partnerships will be coordinated and led by Industry Navigators.

○ **To support a local workforce development system that meets the needs of businesses in the Local Area**

In order to provide innovative solutions to address the needs of businesses and industry, the Team implements a solutions-focused, consultative approach to help businesses and industry in the County and region. Businesses are the primary customers, since without business, there are no jobs.

Team members meet with business leadership to develop working relationships, learn about a business and its operations, and listen to the business leaders’ concerns, needs, and challenges. Services provided by the team are customized to meet each businesses need(s) and can include:

- Innovative solutions to sourcing and recruitment
- Organizing targeted hiring events
- Talent management and talent development
- Business transition assistance: rapid response and layoff aversion
- Consultations regarding workforce development

In addition to providing services for individual businesses, the Board leads in the development of solutions to address the workforce needs of a targeted industry as a whole through industry awareness, training, recruitment, retention, and other solutions.

For those challenges that fall outside of workforce development, the Team will connect businesses with the appropriate local, state, and federal resources.

○ **To better coordinate workforce development programs and economic development**

The Local Board recognizes that economic development creates jobs and the workforce development system supports the development of qualified talent. Economic development is a key member of the Team and provides information on attraction, expansion, and retention of local businesses.

To ensure the system is meeting the needs of all businesses, the Team works collaboratively to engage in a business call program, leverage resources, share intelligence, coordinate outreach efforts, and co-host business events.

o **To strengthen linkages between the American Job Center delivery system and Unemployment Insurance programs**

Career Center and Unemployment Insurance (UI) programs utilize a number of strategies to align and integrate their services. Information about all the programs and initiatives are being presented during the UI workshops held at the Career Center. Referrals are being made from one partner to another and follow up and referral outcomes will continue to be shared. We will continue conducting a targeted outreach to ensure that UI recipients are aware of the services available in the career center.

In addition, information on long-term unemployed individuals provided compiled by UI and provided to the local areas by DLLR will allow partners to aggressively outreach to those individuals who have been out of work for more than 27 weeks. Partners will offer their services to long-term unemployment individuals, which will ensure clients obtain skills required by businesses and receive gainful employment and advance in their careers.

F. A description of how the Local Board will ensure jobseekers have a role/voice in the board's decision making process and in informing the services the Local Area provides.

Area partners will utilize the following strategies to ensure jobseekers' voice is included in decision making:

- regular (annual, quarterly, monthly) satisfaction surveys to be conducted and analyzed;
- job seeker and business focus groups;
- representation on various committees.

G. A description regarding the implementation of initiatives such as EARN Maryland, apprenticeship, incumbent worker training programs, on-the-job training programs, customized training programs, industry and sector strategies, integrated education and training, career pathways initiatives, utilization of effective business intermediaries, and other business services and strategies, designed to meet the needs of businesses in support of the strategy described in Section 1.

The Board supports a demand driven approach that is designed to meet the needs of businesses in support of the strategy described in Section 1.

Industry partnerships and career pathways are integral parts of the Board's Sector Strategies definition. This synergy ensures that there is a system and support that allows a client to step on a career pathway at any on-ramp and proceed to the next level. Industry partnerships inform and drive the building of career pathways, which include decision-making regarding trainings and other skills enhancement models; and lead to work and learn opportunities, and ultimately to unsubsidized employment.

The Anne Arundel Workforce System utilizes a navigation model to operate industry partnerships. Industry Navigators successfully blend the concepts of industry sector strategies and career navigation to effectively serve the unique needs of an industry, while ensuring individuals have a strong understanding

and connection to key regional economic drivers. Industry Navigators are guided by the needs of industry and can be engaged in workforce projects that include cohort training, industry-wide recruitment strategies, industry sector partnerships, career pathways articulation, enhancement of regional training options, and industry awareness campaigns.

To address the customer demand for essential workplace excellence skills, the Board supports Essential Workplace skills trainings as an integral part of many training models. The training is focused on teaching clients the competencies that businesses want and the Workplace Excellence Training modules are aligned with those competencies. Those competencies and modules are:

Adapting to Change: **ADAPT**ability Module

Managing Your Outlook: **REASON**ability Module

Multi-Generational: **RESPECT**ability Module

Managing Your Time: **DEPEND**ability Module

Verbal Communication: **COMMUNICATION**ability Module

Non-Verbal Communication: **COMMUNICATION**ability Module

Written Communication: **WRITE**ability Module

Work Realities & Expectations: **WORK**ability Module

Think Like the Employer: **WORK**ability Module

Personal Presentation: **PRESENT**ability Module

Fitting In On the Job: **SUIT**ability Module

Managing Work & Life: **TRANSITION**ability Module

One of the elements of the demand driven strategy adopted by the Board are Work and Learn trainings that include apprenticeships. The Board recognizes that apprenticeships are an effective model for individuals to earn while they learn and gain hands-on experience in building the skills that businesses require. The Board also supports the development of apprenticeships in non-traditional industries.

In shifting the focus to the needs of business, the need for a regional perspective becomes clear. Businesses attract and require talent that may not be available in a local area. By looking at commuting patterns and labor shed, along with a regional mapping approach, the system is able to assess available resources, needs and economic impacts. This “*solve and serve*” model allows team members the flexibility to “work where the demand is” providing solutions in a timely manner.

H. A description of how the Local Board will coordinate workforce development activities carried out in the Local Area with economic development activities carried out in the Local Area in which the Local Area (or planning region) is located, and promote entrepreneurial skills training and microenterprise services.

Coordination of workforce activities with economic development strategies is the Board’s priority, as the Board takes a “demand-driven” approach to business services. Business is a customer in the system and represents demand, whereas individuals are clients. To ensure the system is meeting the needs of all businesses, the Team works collaboratively to engage in a business call program, leverage resources, share intelligence, coordinate outreach efforts, and co-host business events.

By understanding the needs of businesses, the workforce development system can better prepare individuals with the skills they need to satisfy business recruitment requirements. AAEDC is a key member of the Board and the Team.

AAEDC supports entrepreneurship through their Small Business Resource Center co-located in their offices, and the development of new technology from small businesses within their technology incubator, the Chesapeake Innovation Center.

Anne Arundel County has two small business development center counselors to assist local entrepreneurs and small to mid-size businesses. One counselor is co-located with AAEDC in Annapolis and the other is located at the AAEDC owned Chesapeake Innovation Center incubator.

The Team will work closely with the small businesses and microenterprises to support the growth and development of their workforce including offering entrepreneurial/microenterprise workshops. The Board has a high priority in supporting small veteran-owned businesses.

I. A description of how the Local Board will leverage and coordinate supportive services in the delivery of workforce development activities carried out in the Local Area. Specifically, the Local Plan should address how the Local Board will work with Local Management Boards and other providers to deliver supportive services to jobseekers.

The Board recognizes that in certain circumstances the provision of services that directly impact employability must be supplemented by client supportive services. Supportive services provide financial assistance to participants who would not be able to participate otherwise. In all cases, Board first brokers these services for the client from appropriate partner agencies or other provider sources. However, when supplemental services are not available, or are not the most effective or responsive to the client's need, WIOA funds may be utilized to provide short-term supportive services to eligible participants. Supportive services are approved on an individual basis when determined necessary and reasonable. The service could include transportation, business attire, tools, work or training equipment, child or dependent care, graduation fees, licensing and testing fees, union fees, clothing for interviews or job fairs, medical and healthcare needs, and more.

The local supportive services policy on submission procedures (see Attachment 2 for policy development timeline) and payment issuance will follow and conform with State Policy Issuances and WIOA; and provide for approval forms, receipts, and supporting documentation are available for review.

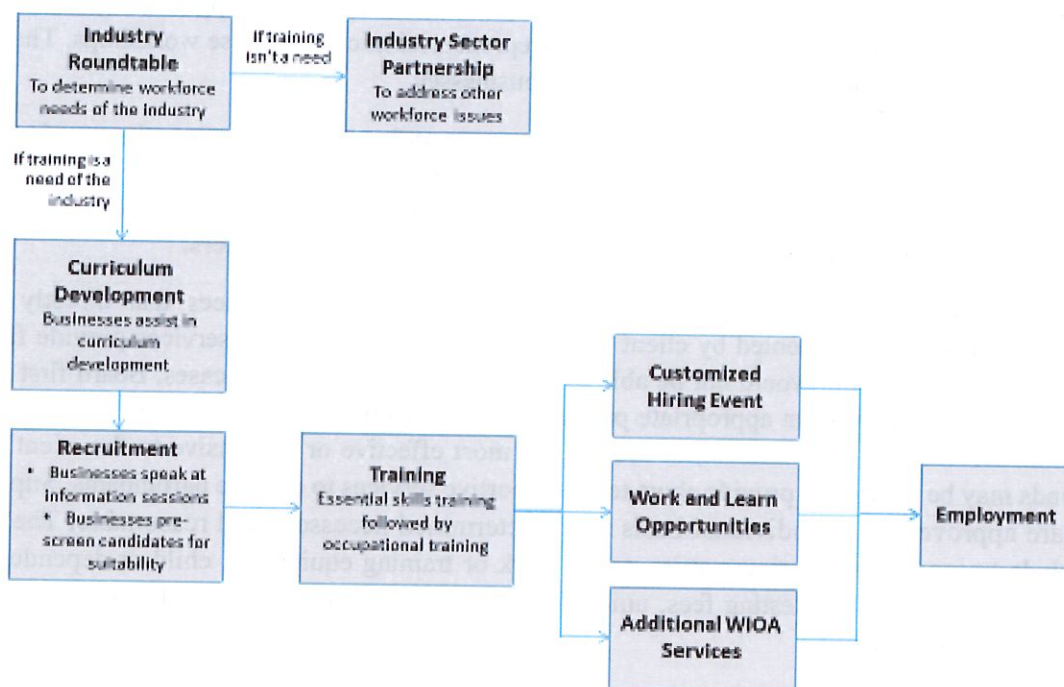
The emphasis on co-enrollments for Title I Adults, Dislocated Workers, and Youth Programs will provide an opportunity to leverage resources and coordinate supportive service efforts across eligible funding streams. The Alignment Committee will work together to identify and discuss opportunities for co-enrollments and corresponding contributions toward workforce activities and supportive services. This will help to avoid duplication of service delivery and leverage existing resources

The Board will coordinate activities with the Local Management Board which will fall in line with the Management Board's areas of focus: prevention service, mental health services, school completion, outcomes, measures, and evaluations, and community resourcing.

J. A description of how the Local Board intend to provide a greater business voice in the delivery of workforce development activities carried out in the Local Area. The description should include how the Local Board will engage businesses on decisions regarding the type and content of training activities.

The Board emphasizes that businesses are the primary customers and individuals are clients. Hence, the Board is made up of business representatives (51% of the membership) who oversee and set priorities for training policies including the demand-driven approach. In order to implement a strong demand-driven approach to training development, the Board will utilize sector-based training. This training model begins with an industry roundtable to determine training needs of the industry, and utilizes business insights to develop the training curriculum. Individuals entering training are screened for suitability by the participating businesses and the training mixes essential skills training and occupation training aligned with businesses' needs. At the end of training participants either enter Work and Learn opportunities or attend a customized hiring event, or move on to receive additional WIOA services.

Sector Training Model



K. A description of how the Local Board will promote and cultivate industry-led partnerships, such as career pathways and EARN Maryland, in the delivery of workforce training opportunities.

Industry partnerships and career pathways are integral parts of the Board’s Sector Strategies definition. This synergy ensures that there is a system and support that allows a client to step on a career pathway at any on-ramp and proceed to the next level. Industry Partnerships inform and drive the building of career pathways, and includes decision-making regarding trainings and other skill-enhancement models. The Board will continue to use Employment Advancement Right Now (EARN) funding to initiate and support sector partnerships and career pathways in the “HITCH” industries.

The Anne Arundel Workforce System utilizes the navigation model to operate industry partnerships. Industry Navigators successfully blend the concepts of industry sector strategies and career navigation to effectively serve the unique needs of an industry, while ensuring individuals have a strong understanding and connection to key regional economic drivers. Industry Navigators are guided by the needs of industry and can be engaged in workforce projects that include cohort training, industry-wide recruitment strategies, industry sector partnerships, career pathways articulation, enhancement of regional training options, and industry awareness campaigns.

L. A description of the role (if any) of local faith or community-based organizations in the local workforce development system.

The Board recognizes that community-based and faith-based organizations provide essential services to their constituencies and are critical partners in building a strong workforce development system. A member of a community-based/faith-based organization will be represented on the Board. The Board will also partner with faith-based and community-based organizations to provide supportive and wrap-around services to address barriers to employment, as well as employment and training services to hard-to-serve populations. Other non-financial, cooperative initiatives may include: providing job seeker workshops at faith-based and community-based organizations facilities, and working with these organizations on recruitment efforts for youth programs.

Section 4: American Job Center Delivery System

A. List the American Job Centers in your Local Area, including address and phone numbers. Indicate the One-Stop Operator for each site and whether it is a comprehensive or satellite center.

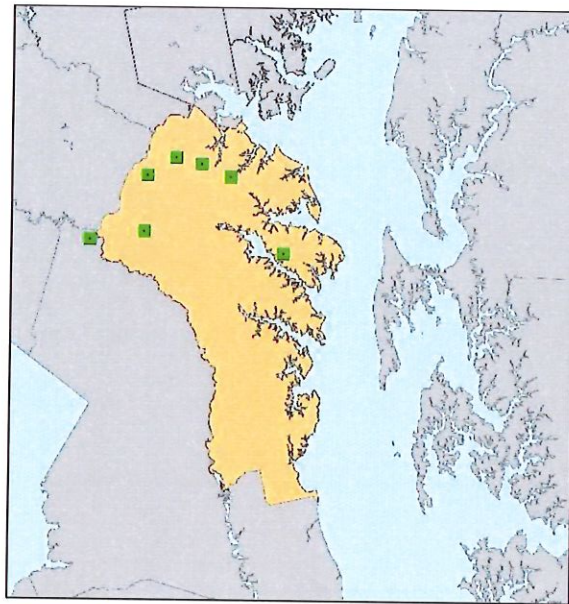
Anne Arundel Workforce Development Corporation (AAWDC) is the county’s authorized Workforce Administrator, pursuant to Title 14 of the Anne Arundel County Code. The selection of Career Centers will be made by the AAWDC President/CEO in conjunction with and approval by the Board. Currently, the County operates one new Career Center.

Anne Arundel Centers

Anne Arundel County Career Center, a proud partner of the AmericanJobCenter network

includes three types of Career Centers:

- Comprehensive – full customer and client services where all core partners are co-located;
- Affiliate Centers – full service centers or those that focus on targeted populations or business customers. These centers do not have representatives of all the core partners;
- County Career Access Points – provide job search and job readiness services to clients and are located in the community.



Comprehensive Center

Anne Arundel Career Center

613 Global Way, Linthicum Heights, MD 21090, 410-424-3240

Affiliate Centers

<p>Laurel Regional Workforce Center – includes representatives of Prince Georges and Howard Counties 312 Marshall Ave., 6th floor Laurel, MD 20707, 301-362-9708</p>	<p>BWI Workforce and Commuter Resource Center BWI Workforce and Commuter Resource Center BWI Airport, MD 21240, 410-684-6838</p>
<p>Arundel Mills, Sales & Service Training Center Arundel Mills Mall, 7000 Arundel Mills Circle Hanover, MD 21076, 410-777-1845</p>	<p>Ft. Meade Outreach Center Building 4432 Ft. Meade, MD 20755, 410-674-5240</p>
<p>Ordnance Road Correctional Center 600 East Ordnance Road Glen Burnie, MD 21060, 410 222-6350</p>	<p>JobsWork!. Arundel Glen Burnie 7500 Ritchie Highway, Suite 307 Glen Burnie, MD 21061, 410-421-8580</p>
<p>JobsWork!. Arundel Annapolis 80 West Street, Suite C, Room 200, Annapolis, MD 21401, 410-269-4535</p>	

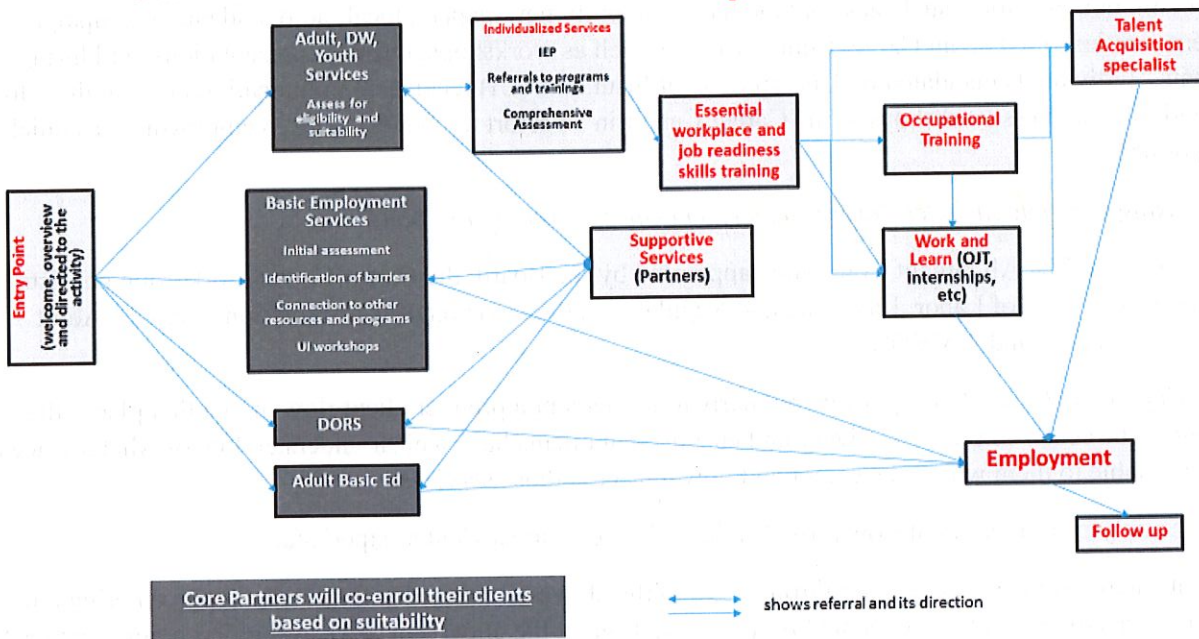
Community Career Connections

<p>@ Freetown Village 7831 Huff Court Pasadena, MD 21122, 410-437-3052</p>	<p>@ Stanton Community Center 92 W. Washington St. Annapolis, MD 21401, 410-349-5013 ext. 300</p>
<p>@ Meade Village 1700 Meade Village Circle, Severn, MD 21144, 410-846-6964</p>	

The Board is working with AACPL and other community organizations to establish presence in Brooklyn Park, South County and other library branches.

B. A description of the customer flow system and process used in the Local Area. This description should include eligibility assessment, individualized training plans, and case management.

Anne Arundel Workforce System Client Flow



The Board directs the planning and execution of a premier comprehensive workforce system where both customers and clients are able to seamlessly access workforce-related resources and support through multiple entry points within the County. The system is easy to use, and provides exceptional service delivery, ultimately meeting the customers' and clients' needs. The graph presented above shows that a client can access the system at any entry point where information about the services will be provided and s/he will be directed to a service at the location it is being delivered.

The County offers multiple *entry points* that include:

- **Community Career Connections**

Working closely with targeted communities in the county, the workforce system provides career-related information and resources for residents that are in closer proximity to these resources than to the Career Centers. The Board ensures that these Community Access Points are located in areas of high unemployment and poverty. Career Access Points include Freetown, Meade Village, and Pioneer City. In these locations, satellite offices are established within these respective residential areas and are staffed by Workforce Specialists who provide resume writing and interviewing assistance; referrals; access to computers for job search; connection to hiring events; and access to Career Center workshops.

- **Community Partners**

Community Partners play a critical role in the community. Partners are able to provide services unique to a client's personal circumstances (i.e. mental health issues; substance abuse; GED tutoring; access to public assistance; housing). A referral process will be developed to ensure that clients experience a seamless transfer from one partner to another with minimal duplication of registration, eligibility, and documentation requirements. Community partners include: OIC, Community Action, Arundel Lodge, Arundel House of Hope, the Lighthouse, Way Station and other organizations that serve veterans.

- **Targeted Outreach**

Utilizing outreach tools such as social media, community newspapers, local radio, and email campaigns clients are informed about Career Center services such as workshops, business presentations, and hiring events. Individuals mandated by Unemployment Insurance (UI) receive communication inviting them to attend job readiness workshops in the Career Center in an effort to connect them to employment as quick as possible.

*Accessing the **Anne Arundel Career Center**, a partner of America's Job Center*

As a subset of the Alignment Committee appointed by the Board, the Career Center workgroup consists of the Department of Labor, Licensing and Regulations, the Division of Rehabilitation Services, Adult Basic Education, and AAWDC.

The Career Center workgroup meets regularly to implement a premier client flow model that places the client at the center of service delivery and ensures that clients have a clear understanding of what services are available to them within the center and how to access those services.

The County's premier client flow provides the following Career Center experience:

Clients arrive at the Career Center through one of the above-mentioned entry points. Upon entering the Center, friendly and knowledgeable Front Desk staff greet the client and serve as the first point of contact. Similar to a traffic cop, the well-trained Front Desk staff are responsible for gaining a better understanding of why the client has come to the center and assist with the navigation of services.

Basic Services

Many clients are seeking immediate assistance with employment attainment. These clients will be referred to Wagner-Peyser staff that assist with resume review and writing, job search, and interview preparation. Using state-of-the-art assessment tools, the staff will determine the career level of clients to determine the need for additional training to improve or establish in-demand skills that lead to industry-

recognized credentials. Wagner-Peyser includes business-facing staff who will work with clients seeking immediate employment opportunities and will successfully connect them to employment.

Wagner-Peyser staff serve as the front-line, working with clients who access the services of the Career Center. Improving services to individuals with disabilities and veterans is a priority. Through intense training on understanding this community, the Career Center staff will better serve this population including determining, through assessments, if a client should be immediately referred to the Division of Rehabilitation Services or other service providers.

Clients requiring additional training are referred to Title I staff. Wagner-Peyser staff meet in person with Title I staff to ensure there is a smooth transition, and minimize duplication of information and eligibility issues. In the future, this process will be automated using electronic referral process. A Standard Operating Procedure will be put in place to ensure that the referral process is effective and tracks outcomes.

Cross agency trainings are conducted to provide staff of various entry points/locations necessary skills and knowledge so the same array of basic services could be provided in those locations, which would create meaningful access for all clients.

Individualized Services

Clients that are referred to Title I services will work with intake staff that will utilize assessment tools to determine suitability and eligibility, and identify any barriers to training and/or employment (i.e. transportation, childcare, etc.). The Intake Specialist will be knowledgeable about all of the workforce system resources available in the community to address these challenges. Upon completing these assessments, clients will be referred to individualized services.

Clients referred to individualized services will work with a **Career Navigation Specialist (CNS)** that will utilize industry-recognized career assessment to determine a client's specific career level (i.e. entry-level; mid-career; advanced career). This tool allows the **CNS** to customize a plan that may include career exploration, occupational training that leads to an industry-recognized credential, training in essential workplace skills, and other job readiness activities.

Supportive Services

Some clients who access the Career Center will have barriers that make it difficult for them to become successful in pursuing employment. In Anne Arundel County, the primary barriers to employment include transportation and access to reliable childcare. Through strong partnerships and innovative strategies, Career Center staff will have access to funding to address these challenges on a short-term basis until such time the client is stabilized through employment and is able to fund these barrier solutions independently. The Supportive Services Policy will be developed in accordance to the timetable presented in Attachment 2.

Essential Workplace and Job Readiness Instruction

Businesses have indicated that the top challenge they face with their talent include the basic workplace attributes that exemplify a model employee such as timeliness, team approach, professional attire, and

working in a multi-generational environment. Clients will participate in essential workplace skills instruction to ensure they have the attributes that businesses demand. In addition, clients will participate in job readiness instruction including resume writing and interviewing skills.

Occupational Training

Training will be primarily focused on high-growth industries (HITCH) and will be provided through either classroom training or through individual training accounts. Businesses will be integrally involved in curriculum review and development, and meeting in advance with training participants to determine their experience and cultural “fit.” This process will ensure that all training will increase the chance of immediate employment upon certification attainment.

Work and Learn

Clients will be assessed to determine if “hands-on” work experience working directly with a business may be required to prepare them to enter the workforce. This experience is beneficial to both the client as well as the business by “testing out” the applicant, as well as providing some work experience within the industry and occupation. In addition, for those businesses that require additional “customized” training within the context of their business needs, clients may receive On-the-Job-Training (OJT) contracts that secure employment post training. These contracts are short-term and is a shared expense between the business and Workforce Innovation and Opportunity Act (WIOA).

Job Development and Employment

To assist with identifying and preparing for employment opportunities, clients will be assigned to a Talent Acquisition Specialist, who works directly with employers that are seeking qualified talent. In the event that a client’s post-assessment of job readiness training needs does not require occupational training, they will be assigned to a Talent Acquisition Specialist responsible for identifying employment opportunities. The Talent Acquisition Specialist is a member of the Business Services Team and is knowledgeable about local market information along with those employers who are actively seeking talent. The Talent Acquisition Specialist will work with the client to customize their resume and prepare them for the interview process.

Follow Up

Staff will periodically contact the businesses to assess the success of the client served and to ensure they continue to be employed with the business. WIOA requires twelve months of follow up to ensure retention. During this critical time, **staff** will confer with the client to ensure employment success and to address any concerns or challenges the client may be facing in the workplace. This partnership between the business and WIOA ensures the client’s success charting their benchmarks and securing their employment.

Businesses are our Customers

The Board recognizes the need to provide exceptional services to businesses seeking skilled and qualified talent. To remain relevant to the business community, Career Center services must be tailored to meet their needs. The Business Services Team will serve businesses in the Career Center by 1) providing

guidance in posting job announcements in the Maryland Workforce Exchange; 2) Assisting in identifying qualified candidates represented in the Maryland Workforce Exchange; 3) Engage businesses in presenting industry-related labor market information to clients; 4) Host hiring events that unite pre-screened, qualified clients with businesses with job openings; 5) Assist in upskilling the existing workforce through development and implementation of incumbent worker training.

C. A description on the process the Local Board intends to provide for the solicitation and selection of a One-Stop Operator as identified in Section 107 of WIOA.

Consistent with section 121(d) of WIOA, the Board, with the agreement of the Chief Elected Officials shall designate or certify one-stop operators and may terminate for cause the eligibility of the provider selected. Selection of the One-Stop Operator will be through a competitive process and shall be a public, private, nonprofit, or consortium of entities comprised of three (3) or more American Job Center partners. The selected One-Stop Operator will have demonstrated effectiveness and will be located in the local area. Examples of organizations that may competitively apply include: institutions of higher education, employment service State Wagner-Peyser Act agencies, community-based organizations, nonprofit organizations, private-for-profit entities, government agencies, local chambers of commerce, business organizations, labor organizations, career and technical education schools, and other interested organizations or entities. Elementary schools and secondary schools shall not be eligible for designation or certification as a One-Stop Operator.

Organizations applying for One-Stop Operator designation must disclose any potential conflicts of interest arising from the relationships with other service providers. The selected One-Stop Operator(s) may not establish practices that create disincentives to providing services to individuals with barriers to employment who may require longer-term services, such as intensive employment, training and education services. And, the selected One-Stop Operator(s) must comply with Federal regulations and procurement policies related to calculation and use of profits. The Board will consider proposals that have direct costs associated with providing the One-Stop Operator roles and responsibilities, and proposals that have costs incorporated within other on-site service provider activities and no direct One-Stop Operator budget.

To ensure there is no conflict of interest or perceived conflict of interest, the Board may consider hiring an independent consultant to facilitate the procurement process. In this option, the Operations Committee of the Board will work directly with the independent consultant to develop a request for proposal and evaluation tool. No workforce system service provider or potential service provider will be involved in the development of the request for proposal or the selection process. In the event only one proposal is received, the Board will proceed with sole source procurement with the approval of the Chief Elected Officials.

The One-Stop Operator activities are revised annually and procured as needed.

D. A description of how the Local Board will ensure the continuous improvement of eligible providers of services through the system and ensure that such providers meet the employment needs of local businesses, and workers and jobseekers.

The Board will utilize a pay-per-performance Request for Proposal (RFP) process when warranted. The selection of the vendors will be based on past performance of the vendor and assurance that their curriculum is in line with the needs of businesses. All providers will be required to participate in an initial onboarding process, which includes staff training, understanding of MWE, and paperwork

requirements. In addition, regular (30-60-90 days) monitorings and reviews will be scheduled to determine whether the vendor meets requirements of the program. Technical assistance will be provided during the entire implementation process.

The RFPs will be announced publicly and bidder's conferences will be held for interested vendors. The Proposal Review Committee, consisting of selected members of the Board, will review proposals and score them based on pre-determined categories.

In addition, a ScoreCard will be developed to include performance outcomes of each service provider and presented regularly to the Alignment Committee and the full Board to ensure continuous improvement.

E. A description of how the Local Board will facilitate access to services provided through the American Job Center delivery system, including in remote areas, through the use of technology and through other means (partnerships, skype, faith-based, toolkits, website resources).

Using technology such as web access will address access to resources for clients who are in remote areas or face barriers to physically accessing the Career Centers. Much of the client flow process will be mirrored virtually including intake eligibility documents; access to the Maryland Workforce Exchange; web-based seminars on resume instruction and practicing interviewing; live streaming and recordings of workshops taking place in the Career Center.

Agency partners and other partnering organizations will work with the workforce development system to ensure their clients have access to services by linking workforce information on their home page.

In addition, the Board supports establishment of **Community Center Connections** that are located in communities with high need for the workforce system services.

The Board's Community Outreach activities will ensure information and instructional activities are provided in libraries, housing communities, and faith-based organizations for individuals who are unable to physically access the Career Center.

F. A description of the roles and resource contributions of the American Job Center partners.

The description of partners' roles and responsibilities is located in the signed MOU. The Board is in the process of reviewing the MOU and RSA that will be signed by June 30, 2019.

G. A description of how the Local Board will use Individualized Training Accounts based on high-demand, difficult to fill positions identified within local priority industries identified in Section 1(A).

The Board will define how Individualized Training Accounts (ITAs) will be utilized as part of a larger training strategy as part of its local policy guidance (see Attachment 2 for policy development timeline). Currently, the ITA development and approval process is guided by the following guidelines:

WIOA Sec. 134(c)(3)(G)(iii) states that "[t]raining services provided under this paragraph shall be directly linked to an in-demand industry sector or occupation in the local area or the planning region." As such, the Board limits individual training to those industries and occupations that the Local Workforce Development Board deems in-demand. Those industries and occupations are identified on the documentation that clients received at intake.

The Board seeks to provide training opportunities within high-demand industries or occupations that aligns with one of the following **H.I.T.C.H.** categories:

Hospitality, Retail, & Tourism

Information Technology & Professional Services (Project Management; Accounting/Bookkeeping; Administrative, etc.; Scientific and other technical services)

Transportation/Logistics/Warehousing

Construction, Trades, & Manufacturing (Welding; Interior Design; Carpentry, etc.)

Healthcare & Social Assistance (Allied health professionals; counseling, etc.)

The Board has set a spending cap on all ITAs of \$3,000.00. This cap is reviewed on an annual basis. In all cases, the Board seeks to provide high-value training solutions by operating cohort trainings in the most in-demand and popular occupations and industries in the local area.

H. A description of how the Local Board will provide priority of service that conforms with the State Plan. This should include a description of additional local requirements or discretionary priorities including data to support the need and how the local requirement and/or priority will be documented and implemented for the Adult program.

The Board ensures that the majority of participants in the WIOA Adult program meet the definitions for veterans, low-income, public assistance, and/or basic skills deficiency.

1 st Priority	Veterans and eligible spouses who are also low-income, recipients of public assistance and/or basic skills deficient
2 nd Priority	Individuals who are not veterans or eligible spouses, are recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient
3 rd Priority	Veterans and eligible spouses who did not meet "first priority" conditions
4 th Priority	Additional priority populations established by the Governor or Local Workforce Development Board
5 th Priority	All other individuals who qualify for the Adult Worker program

Other population categories that have barriers to employment will also have priority of service. Local priority of service will come after Federal and State priorities have been addressed:

Targeted populations
Veterans
Individuals who do not have a HS diploma*
Individuals with disabilities*
Out-of-school youth ages 18-24*
Long-term unemployed (those who exhausted their UI benefits)*
Ex-offenders*
Older workers (50+)*
Low-income (TANF and SNAP recipients, homeless)
Individuals receiving Public Assistance
Individuals with barriers to employment
Working Poor

*Local targeted groups

The Board developed a policy on priority of services that is guided by the principals outlined in the State Plan and provided below (the policy is attached in Attachment XX).

I. A description of how the Local Board will utilize funding to create incumbent worker training opportunities.

Incumbent worker training is a strategy developed to ensure career pathways programs are implemented efficiently and current employees advance in their careers through additional trainings and obtaining credentials. Incumbent worker training funds shall be expended on a project-by-project basis. Projects may consist of a single firm or utilize a sector-based approach that combines several businesses with similar workforce needs. Each project will meet guidelines established by the Board. The Board developed and adopted an incumbent worker policy (see Attachment 2).

J. A description of how the Local Board will train and equip staff to provide excellent, WIOA-compliant customer service.

The Board designed and will maintain a customer centric design which will be aligned with the principals outlined in the State Plan: Engaging businesses, Providing excellent customer service, Building an efficient workforce system, Developing standards, policies and procedures, Utilizing Technology, Ensuring a system that serves all and is accessible to individuals.

To implement a customer centric workforce system, the Alignment Committee that includes representatives of all core partners work together to identify specific staff development training that is required to serve various population categories and various locations/entry points. The plan includes instruction on serving clients with disabilities; assessing individuals with low literacy skills and how to ensure their career success; how to assist individuals re-entering the community on overcoming the barrier of having an ex-offender status. Intake Specialists and CNSs will serve as subject matter experts on these issues. In addition, the front desk function will receive intense training on targeted populations but will also have extensive knowledge regarding how to access other community resources; transportation routes; and AAWDC and other initiatives. They will be able to essentially serve as the back-up for the Intake Specialist.

In addition, regular staff technical trainings will be conducted on system policies, procedures and technology.

The Board will continue to conduct periodic customer and client satisfaction surveys to serve as a guidepost for measuring success in offering excellent customer service. These surveys will assist in identifying systemic issues needing improvement and will be addressed and incorporated into excellent service delivery system immediately.

Section 5: Title I – Adult, Youth and Dislocated Worker Functions

A. A description and assessment of the type and availability of adult and dislocated worker employment and training activities in the Local Area.

Anne Arundel Workforce Development Corporation (AAWDC) was designated by the Anne Arundel County Local Workforce Development Board to be a provider of the Adult, Dislocated Worker, and Youth services in Anne Arundel County.

All Adult and Dislocated Worker services are designed to start, advance, or transition County residents on a pathway to employment in high-growth middle and high skill occupations in in-demand industries.

Activities	Partner
Eligibility of Services	Core Partners
Outreach, intake, orientation	Core Partners, Library
Initial assessment	Core Partners
Labor Exchange services	DLLR
Referrals to programs	Core Partners, Library
Labor market information	AAWDC, DLLR, EDC
Supportive services information	Core Partners, Library
Unemployment Insurance information & assistance	DLLR
Financial Aid information	Core Partners
Comprehensive assessment	Core Partners
Individual employment plan	AAWDC, DORS
Career planning, counseling	AAWDC, DORS
Short-term prevocational services	AAWDC, DORS
Work experience	AAWDC, DORS, DSS
Out-of-area job search	DLLR, DORS
Financial literacy services	AAWDC, CBOs, FBOs
English language acquisition	Adult Education Providers, CBOs
Workforce preparation	Core Partners, DSS
Occupational skills training	Training Providers, DORS
Work and Learn	AAWDC, DORS
Programs that combine workplace training with related instruction	AAWDC, DORS, Training Providers
Training programs operated by private sector	AAWDC
Skill upgrading and retraining	Training Providers, DORS
Entrepreneurial training	AAWDC, Training Providers
Customized training	AAWDC, Training Providers, DORS
Incumbent worker training	AAWDC, EDC, DLLR, Training Providers
Adult education and literacy activities	Adult Education Providers, DORS
Job readiness training	Core Partners

*Adult Education Providers – Anne Arundel Community College and Anne Arundel Public School System

** Core Partners – Department of Labor, Licensing and Regulation; Division of Rehabilitation Services; Anne Arundel Workforce Development Corporation; Anne Arundel Community College.

B. A description of how the Local Board will coordinate workforce development activities carried out in the Local Area with statewide rapid response activities, as described in Section 134(a)(2)(A).

The primary goal of Rapid Response is to transition workers to reemployment as quickly as possible. In our increasingly globalized and highly competitive economy, businesses are hardly ever stable. Businesses are constantly growing or shrinking. One of the biggest challenges businesses must face is having a workforce that is skilled enough to allow them to innovate and compete, and ultimately grow and prosper in this economy.

Rapid Response is a pro-active, business-focused, and flexible strategy designed to help growing businesses access an available pool of skilled workers who have been trained in the skills that the business needs to be competitive. Often these workers come from other businesses that are downsizing. It also is designed to respond to layoffs and plant closings by quickly coordinating services and providing immediate aid to businesses and their affected workers.

Rapid Response teams will work with businesses and employee representative(s) to quickly maximize public and private resources to minimize the disruptions on businesses, affected workers, and communities that are associated with job loss. Rapid Response can provide customized services on-site at an affected business, accommodate any work schedule(s), and assist companies and workers through the painful transitions associated with job loss.

C. A description and assessment of the type and availability of youth workforce development activities in the Local Area, including activities for youth who are individuals with disabilities, which description and assessment shall include an identification of successful models of such youth workforce investment activities.

The Board recognizes the need to prepare the emerging workforce for starting on a career path and acquiring the necessary education, skills, credentials and experience. To facilitate the process and help youth find their career path, the Board will incorporate 14 elements of the Youth program to include:

1. Tutoring, skills training, and dropout prevention;
2. Alternative secondary school services;
3. Paid and unpaid work experiences;
4. Occupational skills training;
5. Leadership development opportunities;
6. Supportive services;
7. Mentoring;
8. Follow-up services;
9. Counseling;
10. Concurrent education and workforce preparation activities;
11. Financial literacy education;
12. Entrepreneurial skills training;
13. Labor Market Information (LMI);
14. Preparing for Post-Secondary Education and training.

For that, the Board will support a model that includes career exploration, essential skills training, occupational trainings that lead to credentials, and work experience opportunities. In addition, the Board

continues to support the establishment of an affiliate location or a designated area of a career center exclusively focused on the needs of youth ages 14-24.

In order to prepare the emerging workforce, the Board recommends the establishment of industry “academies” that focus on high-growth industries in the County and surrounding regions. These academies will align with the required elements for youth programming. Specific focus will be made on career exploration; barrier removal; mentoring; essential workplace skills; work and learn opportunities; and connection to employment. Utilization of all these tools will ensure that all 14 elements are being provided to the youth population. The primary focus will be on the out-of-school youth population with a secondary focus on the in-school youth population (specifically seniors not pursuing post-secondary education). This will be an academy approach that would provide for accessing the services of partner agencies and organizations that specialize in a specific component. In addition, businesses will play an integral role in the development of industry-specific training curriculum and certification as well as serving as mentors and supporters of work and learn opportunities.

Targeted outreach efforts will focus on specific areas within the County with the highest unemployment rate of out-of-school youth. Career exploration and job readiness activities, along with work and learn activities (*summer employment*) will be the focus of in-school youth programming.

The Department of Social Services and the Division of Rehabilitation Services will refer clients to Anne Arundel County YouthWorks initiative for job readiness and occupational training services. This will allow the YouthWorks initiative to customize programs, workshops, and trainings that incorporate case management, GED attainment, and barrier removal. Youth Career Coach in partnership with the Business Solutions Team will engage in awareness events for businesses to better understand the return on investment in employing youth with disabilities.

D. A description of how the Local Board will coordinate education and workforce development activities carried out in the Local Area with relevant secondary and postsecondary education programs and activities to coordinate strategies, enhance services, and avoid duplication of services.

The Board through the Alignment Committee **developed and will maintain** common referral process which includes referral and information release forms to be used by both education and workforce, as well as setting up a shared tracking system. The community college and workforce are also exploring opportunities for creating an integrated participant assessment process. This will decrease duplication of efforts spent on document and data/information collection for all partners and more importantly, will make the service delivery process more efficient from a client perspective.

AAWDC and Anne Arundel Community College (AACC) are now co-located at the new Career Center, which improves the integration and alignment processes described above.

The Board recognizes the need to prepare youth who are not continuing into post-secondary education by providing career related information and resources. In partnership with Anne Arundel County Public Schools (AACPS), the Board will educate counselors on how to leverage workforce development system and how to connect graduating seniors with career opportunities.

Students attending evening high school will be reached out and offered services that would ensure they are not only getting high school education and diploma but also are prepared for entering the workforce.

E. A description of how the Local Board will coordinate workforce development activities carried out under this title in the Local Area with the provision of transportation, including public transportation, and other appropriate supportive services in the Local Area.

Transportation barriers have been identified by the Industry Engagement committee as one of the major barriers for employment in the County. This problem has to be tackled on both regional and local levels. The Board will continue to actively participate in conversations around workforce transportation on a state and regional levels. At the same time, the Board will explore RideShare models and usage of technology in connecting participants to trainings and employment. The Board is also trying to utilize innovative models and work with companies like Uber, Lyft and others.

The Board will continue to provide transportation supportive services on a case-by-case basis if assistance is required to participate in an education or training activity.

F. A description of how the Local Board will utilize Local Adult Funding, based on adult priority groups as specified in the State Plan.

Targeted populations
Veterans
Individuals who do not have a HS diploma*
Individuals with disabilities*
Out-of-school youth ages 18-24*
Long-term unemployed (those who exhausted their UI benefits)*
Ex-offenders*
Older workers (50+)*
Low-income (TANF and SNAP recipients, homeless)
Individuals receiving Public Assistance
Individuals with barriers to employment
Working Poor

*Local targeted groups

The Board will adhere to State and Federal guidelines regarding priority of service provided to veterans and other priority groups identified in the State Plan.

In addition, the Board identified the following targeted population groups to which it will extend priority of service privileges. Local priority of service will come after Federal and State priorities have been addressed.

The Board recognizes the need to extend the length of time individuals are engaged in the workforce development system and charges the partners to come up with innovative services to meet clients where they are to start, advance, or transition to a new career path; address their barriers to employment; ensure that they have essential workplace skills and industry certifications in order to meet their full career potential.

The Board encourages the use of CNSs that specialize in working with targeted populations. These population-specific Career Coaches called Career Navigation Specialists take a holistic approach to working with a population that needs more intensive services and wrap-around supports in order to

succeed. Navigators are involved throughout the entire individual experience, from outreach and screening to placement and retention. For example, Navigators might work with individuals with low literacy and use a combination of contextualized and occupational training in order to address adult basic skills deficiency.

Whereas Career Coaches respond to individuals that come into the career center system, Navigators actively seek the targeted clientele to ensure their representation in the system. They become more involved and proactive in the circumstances of their clientele that may ultimately be the tipping point between failure and success in achieving successful employment outcomes. As such, Navigators have a much smaller case load than a typical career coaches.

Services to be provided to individuals include essential workplace skills training, life skills, job readiness training, barrier removal, career exploration, hard skills enhancement/occupational training, work and learn opportunities, connection to employment, and follow up and retention.

Contextualized learning and bridge programs will be used to blend basic skills and occupational training for Adult populations to quickly and efficiently move them to employment.

In order to support the challenges that clients face in obtaining employment and training, the Board will ensure strong collaboration and alignment of supportive and wraparound services with partners with expertise in providing these services. A flexible supportive services policy will be developed to mitigate barriers to employment that clients face.

AAWDC utilizes and disseminates data provided by the Office of Research, Performance, and Compliance that tracks clients using segmentation. The data tracks Adult performance measures including training, industry, and certifications. Local and regional labor market information is utilized as the guidepost for determining both classroom and individual trainings. Trainings are required to be aligned with high-demand industries in the County and regional areas along with in-demand occupations. Training curriculum development will be led by businesses and industry leaders, and along with the community college system and other training providers in determining content and certifications that align with job opportunities. Clients will provide evidence of employment at the conclusion of training (*this may include stackable credentials*), or will be connected to employment opportunities during the period of training to ensure that all training leads directly to employment.

Primary funding for training will focus on the above criteria along with data that aligns with career interest, alignment with high-growth industries and in-demand occupations and preferred training format (*ITA versus Class-size training*).

Incumbent Worker trainings to be provided to current employees who need additional upskilling and/or new certifications. This model will allow clients to progress on their career pathway.

G. A description of how the Local Board will utilize Local Dislocated Worker Funding.

The Board's vision is to provide individuals who lost their jobs through no fault to their own with an opportunity to gain the skills that would allow them to quickly reconnect with employment.

The Board supports a model of assigning a CNS that specializes in working with this population. The CNS conducts an assessment of skills and experience to define skills gaps, identify transferable skills and create an individual training plan. The CNS uses innovative techniques to address barriers to reemployment of dislocated workers. The training plan would focus on occupational trainings that lead to certification/credential and/or work and learn opportunities. Credentials are an important priority since

they allow an individual to be marketable within the industry or occupation, and grow in the field along the chosen career pathway. Work and learn opportunities do not necessarily provide a certification but they give a chance to obtain work experience and skills through performing an actual job. For certain occupations this experience is very valuable since it cannot be substituted by credential and/or regular training. This model also allows for a business to establish personal relationships with an individual and make decisions about a cultural fit.

In order to support the challenges that clients face in obtaining employment and training, the Board will ensure strong collaboration and alignment of supportive and wraparound services with partners with expertise in providing these services. A flexible support services policy will be developed to mitigate barriers to employment that clients face.

H. A description of how the Local Board will define “self-sufficiency” for employed Adult and employed Dislocated Worker participants.

The Board has adopted a living wage standard for self-sufficiency. To calculate the living wage, the Board has opted to utilize the Massachusetts Institute of Technology (MIT) Living Wage Calculator at livingwage.mit.edu. For Dislocated Workers, the Board will consider a participant as an underemployed Dislocated Worker if the current family income is 75% of the pre-layoff family income. **The Policy determining the framework was developed (Attachment 2).**

I. A description of the Local Board’s definition of “unlikely to return to previous industry or occupation” when required for eligibility for Dislocated Worker services.

The Board defines “unlikely to return” in the broadest terms: family, personal, lack of necessary skills, or financial circumstances that may affect the likelihood of the participant to return to a previous industry or occupation. **The Policy determining the framework was developed (Attachment 2).** Particularly, the definition states that:

An individual who is laid off without a recall date, or the recall date has passed, and falls into one of the following categories:

- The number of jobs in the applicant’s previous industry and occupation is declining based on Labor Market Information data; or,
 - The projected annual increase in employment growth within the local area based on Labor Market Information or O’Net is fewer than 100 jobs in the previous industry, including replacements, or the projected annual increase in growth openings is fewer than 30 jobs in the previous occupation; or,
 - The applicant is dislocated from a job not on the Local Area’s new and emerging industries and occupation sector priority approved list; or,
 - The applicant has conducted a dedicated but unsuccessful job search in the previous industry and occupation, as evidenced by employer rejection letters or employer contact logs; or,
- The applicant is unable to perform the duties of the previous job due to age, ability, or disability

J. A description of how the Local Board will interpret and document eligibility criteria for “requires additional assistance to complete an educational program or to secure or hold employment” as set forth in the State’s Youth Policy and WIOA Sections 129(a)(1)(B)(iii)(VII) and (a)(1)(C)(iv)(VII).

The Board has determined that a youth who has had only low-wage employment, short-term employment, or an inability to secure a wage at a self-sufficiency level for a single adult (\$12.36 per hour) will be

considered as “requiring additional assistance.” Eligibility documentation is defined in local policy guidance. See Attachment 2 for policy development timeline.

K. A description of the documentation required to demonstrate a “need for training.”

The Board defined the documentation required for training in local policy guidance. See Attachment 2 for policy development timeline.

L. A description of how the Local Board will provide the fourteen required program elements for the WIOA Youth program design.

AAWDC will directly provide or procure all fourteen elements of the Workforce Innovation and Opportunity Act (WIOA) Youth program design.

M. A description of the steps the Local Board will take to ensure at least 20% of Youth Funds are used for work-based training activities.

The Board will develop a policy that would require that at least 20% of the Youth funds are used for work-based training activities. The Controller will provide updates to the Board on relevant expenditures at every full Board meeting. The program director and Controller will keep budgetary track of the percentage to ensure that the requirement is met.

N. A description of the Local Board’s plan to serve 75%+ out of school youth and identify specific steps that have been taken to meet this new goal.

The Board recognizes the importance of focusing on serving out-of-school youth. Therefore, 75% of WIOA Youth funds has been set to serve this population segment.

Outreach efforts will be conducted throughout the County that include participation and hosting of community youth events. The use of digital outreach strategies (i.e. social media, texting) should increase the number of youth that are reached. Partners such as the public school system, community and faith-based organizations will also be leveraged as a way to reach harder to serve youth. In addition to these methods, the Board will support creation of opportunities for Design Thinking that allow youth to vocalize their needs and help create programs that will support them.

Innovative measurements, such as Career Scope, Career Coach and other career assessment tools, are utilized to help out-of-school youth identify their strengths and career trajectories. Assessment outcomes will help youth and CNSs to develop career pathways and an array of services. The services will include: career exploration, mentorship programs, work and learn opportunities, and participation in industry academies.

O. If the Local Area has contracted with youth service providers, provide a list and description of services.

The Board established a contract with KRA Corporation to provide services for the Out-of-school youth. The Scope of Work incorporates the 14 required elements as well as wraparound services.

P. A description of how the Local Board will provide basic and individualized career services to customers. The description should explain how individualized career services will be coordinated across program/partners in the American Job Centers, including Vocational Rehabilitation, TANF, and Adult Education and Literacy activities. This description should specify how the Local Area will coordinate with these programs to prevent duplication and improve services to customers.

To allow for seamless and streamlined referral and customer centric service delivery process, the Board created the local Alignment Committee to address the coordination of basic and individualized services. The Committee is developing processes such as common referral and information release forms and other aspects of an integrated service delivery to be utilized by partners, as well as setting up a shared tracking system. This will reduce the burden on a client to produce similar information multiple times and increase efficiency of the process.

Q. Describe the Local Board's follow-up services policy. This should include follow-up requirements, frequency of contact, and required documentation.

The Board will adopt a case management policy to include follow-up services (see Attachment 2 for policy development timeline). Currently, the Board utilizes guidelines and rules established by legislature and the State. Follow up services are conducted at least once a quarter for adults and dislocated workers and once a quarter for youth clients. A script for a phone call contacts was developed and implemented. And enhanced Verification of Employment form was also introduced to track employment outcomes for every participant through the entire follow-up period.

Section 6: Title II – Adult Education and Family Literacy Functions

- A. A description of how the Local Board will coordinate workforce development activities in the Local Area integrating the provision of adult education and literacy activities under Title II of WIOA, including, but not limited to, the implementation of the career pathways model. The description should include a discussion of how the Local Board will comply with requirements to review local applications submitted under Title II as set forth in guidance provided by the Division of Workforce Development’s Office of Adult Education and Literacy Services. Once review has been conducted, the Local Board will submit documentation (DLLR WIOA Alignment Form) of the review and any recommendations for increased alignment to the applicant for Title II services in a timely manner.**

To ensure that all County residents have an opportunity to enhance those skills that meet business requirements, the Board supports innovative techniques such as contextualized learning that blends both adult basic skills and industry skills, allowing individuals to start on career pathways to middle skill careers. The Board will support the development of the career pathway maps for occupations within in-demand, HITCH, industries. This will be explored and implemented by the coordinated effort of workforce development and adult education partners.

The Board will ensure strong alignment between workforce and adult education services including finding innovative and efficient collaboration tools. Representatives of adult education providers will become members of the Alignment Committee that was established by the Local Board to ensure alignment of services and efficiency of their delivery are maintained.

In accordance with guidance provided by DLLR, the Board will review the Title II Adult Education grant application to make sure it is in line with the Board’s vision and priorities.

- B. A description of how the Local Board will coordinate efforts with Title II providers to align basic skills and English language assessments. The description should include:**
- o An outline of the agreed upon steps that will be taken to align basic education skills and English language assessments within the local area, including, but not limited to, any Memoranda of Understanding entered into by the workforce development and adult learning partners;**

Adult Education and workforce partners will administer the TABE or other National Reporting System (NRS) approved-assessments to participants in need of basic skills remediation. Participants with limited English language proficiency will be referred to the AACC ESL program for assessment and will be administered the CASAS or other approved assessments. Participants entering the National External Diploma program (NEDP) will be administered the CASAS or other NRS approved assessments. An MOU will include core partners and will address the specific responsibilities of each partner under Title II.

- o An identification of how assessment scores will be shared among WIOA Title I areas and Title II providers (Consideration must be given to the Federal Education Rights and Privacy Act (FERPA));**

A process will be developed to ensure that participants are efficiently referred to and from workforce and Adult Education providers. A referral form will be developed and will include basic demographic information and assessment scores. An Information Release (written in accordance with FERPA)

statement will be included on the referral form and signed by participants. Referral forms will be sent to the identified contact person within each organization. In addition, the partner organizations will work together to develop a shared, electronic case management database in which pertinent participant information will be stored and will be readily accessible by all partners.

- **An identification of who will conduct which of the approved assessments (including for Trade Participants) and when such assessments will be conducted, consistent with this policy;**

The Board will develop a policy on this issue. The Board will maintain the integrity of the tests and assessments and follow regulations and guidelines.

All assessments will be administered according to the Maryland State Assessment Policy. Anne Arundel Community College (AACC) Adult Education staff will train workforce partners who administer the TABE and advise assessment staff on the State Assessment Policy to ensure compliance. Workforce partners will assess participants based on the requirements for various training programs: the choice of assessments will be dictated by industry needs.

AACC staff will administer the TABE, or other approved NRS assessments, to all participants who are interested in entering the Adult Education program. Participants who lack English language proficiency will be administered the CASAS assessment

Trained assessment staff from the National External Diploma program (NEDP) will administer the CASAS, or other approved NRS assessments, to participants interested in entering that program.

- **An outline of how the local area will coordinate testing between workforce development and adult education providers; and,**

Workforce development will assess participants who are eligible for their programs. If participants are identified as lacking a high school diploma or English language proficiency, they will be referred to one of the Adult Education programs.

- **An outline of how the local area will ensure that test administrators are to be trained in accordance with this policy and applicable testing guidelines as set forth by the applicable test publisher.**

AACC Adult Education staff will be responsible for training core partners who use the TABE as an assessment.

- C. A description of how the Local Board will ensure that the individual appointed to represent Title II services on the Board will coordinate with all Title II Grant Administrators in the Local Area in a uniform, regular and consistent manner.**

The Title II representative will have regular communications with the Title II Grant Administrators from AACC and AACPS regarding relevant items discussed with the Local Board. The Title II representative and the AACC and AACPS Grant Administrators are members of the Anne Arundel County Alignment Committee. Title II related issues or concerns are addressed during the monthly Alignment Committee meetings and are also relayed to Local Board members at meetings. Coordination of these efforts will be documented in meeting notes.

- D. A description of how adult education services will be provided in the American Job Center system within the Local Area.**

The AACC Adult Education Program Assistant was relocated to the Anne Arundel County Career Center in Linthicum Heights to provide information and intake to individuals seeking Adult Education services. AACC staff participate in regular combined staff meetings while the AACC and AACPS Grant Administrators serve on the Alignment Committee. The AACC Grant administrator also serves on the Career Center Managers sub-committee. Adult Education classes are provided throughout the county in locations that are easily accessible by public transportation.

The performance outcomes will be shared with Governance Committee of the Workforce Development Board through a scorecard to be developed by the Office of Research, Performance and Compliance.

Section 7: Wagner-Peyser Functions

A. A description of plans and strategies for, and assurances concerning, maximizing coordination of services provided by the State employment service under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) and services provided in the Local Area through the American Job Center delivery system, to improve service delivery and avoid duplication of services.

The services provided under the Wagner-Peyser Act will be basic career services including assessment of skill levels, abilities, and aptitudes; career guidance when appropriate; job search workshops; and referral to jobs or training as appropriate. The services offered to employers, in addition to referral of individuals to job openings, include matching job requirements with individual's experience, skills and other attributes; helping with special recruitment needs; assisting employers in analyzing hard-to-fill job orders; assisting with job restructuring; and helping employers deal with layoffs.

Additional services may include a computerized career information system including access to state job bank resources and institutions and organizations that provide training; the development and distribution of state and local workforce information which allows individuals, employers, providers and planners of job training, and economic development to obtain information pertaining to job opportunities, labor supply, labor market or workforce trends, and the market situation in particular industries.

The priority of services will be given to veterans, including transitioning veterans and eligible spouses. The focus will be made on unemployment insurance claimants who participate in RESEA and ROW workshops.

The Department of Labor, Licensing and Regulations (DLLR) is a core partner in the Anne Arundel County Career Center, which makes it easier to coordinate services. It creates opportunities for joint staff trainings, experience and data sharing, and warm referrals. In particular, the Alignment Committee brings all system partners together to share experience and find ways for further coordination and alignment. A Career Center subcommittee as a subset of the Alignment Committee was created to provide a venue for Career Center and other partners to develop new strategies, discuss challenges, and find solutions. The workgroup will continue to meet on a monthly basis and report to the Alignment Committee on a quarterly basis. Examples of the discussion topics are: common referral form, shared referral tracking system, and common information release form. Wagner-Peyser staff will be represented on both Alignment Committee and Career Center subcommittee.

In addition, the DLLR business services staff are part of the Anne Arundel County Business Services Team that provides the following services: recruitments, job fairs, and other projects. DLLR business representatives will receive access to Salesforce system to make sure information is being shared in the most efficient way. The teams will continue to discuss possibilities for more integration and collaboration.

A detailed description of roles and responsibilities will be outlined in the MOU and RSA.

B. If applicable, a description of how the Local Board will coordinate with the Wagner-Peyser program to provide migrant and seasonal farm workers in its Local Area will be provided employment services.

Wagner-Peyser staff will verify monthly all job seekers that enroll as Migrant Seasonal Farm Workers in the Maryland Workforce Exchange. Verified Migrant Seasonal Farm workers will be contacted and informed of the various training, employment, and supportive services available to assist them with achieving greater economic stability. Wagner-Peyser staff and WIOA staff will work closely to achieve those goals.

Section 8: Title IV - Vocational Rehabilitation Functions

- A. A description of the replicated cooperative agreements (as defined in section 107(d)(11)) between the Local Board or other local entities described in section 101(a)(11)(B) of the Rehabilitation Act of 1973 (29 U.S.C. 721(a)(11)(B)) and the local office of a designated State agency or designated State unit administering programs carried out under title I of such Act (29 U.S.C. 720 et seq.) (The Maryland State Department of Education's Division of Rehabilitation Services) (other than section 112 or part C of that title (29 U.S.C. 732, 741) and subject to section 121(f) in accordance with section 101(a)(11) of such Act (29 U.S.C. 721(a)(11)) with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers, and other efforts at cooperation, collaboration, and coordination.**

The Maryland State Department of Education/Division of Rehabilitation Services (DORS), in accordance with 29 U.S.C. 721(a)(11) will provide the following services to individuals with disabilities:

- Provide intake, orientation, assessments for disabled individuals and develop an Individualized Plan for Employment for those who are both eligible to receive services and meet the Division's Order of Selection criteria;
- Provide guidance and counseling, physical restoration, and training to financially eligible persons with disabilities;
- Provide Pre-Employment Transitioning Services, for students with disabilities as defined by WIOA;
- Provide follow-up services to enhance job retention;
- Provide Supported Employment Services for youth with disabilities as defined by the Workforce Innovation and Opportunity Act (WIOA);
- Provide performance information as required by WIOA;
- Provide cross training and technical assistance to workforce staff on disability related issues and on assistive technology;
- Engage employers through the Division's Business Liaisons;
- Work in a collaborative manner to coordinate services among the workforce partners for individuals with disabilities.

- B. A description of how individuals with disabilities will be served through the American Job Center system in the Local Area.**

DORS will serve all individuals with disabilities who are both eligible to receive services and meet the Division's Order of Selection criteria through referrals from other partners who are self-directed. For those individuals who do not meet DORS Order of Selection criteria and subsequently are placed on a waiting list for services, referrals to partners will be coordinated to ensure connection to appropriate resources. As outlined in the Resource Sharing Agreement, DORS will contribute to funding a Career Center Manager to oversee operations at the American Job Center in Linthicum, and a Front Desk Coordinator to help facilitate a streamlined process for all consumers coming into the American Job Center in Linthicum. A universal referral form and service delivery process has been initiated to enable individuals visiting the Anne Arundel County Career Center system the opportunity to select the services that best suit their needs, which in turn, will make the process more efficient. This service delivery

process will continue to be monitored and amended as appropriate to ensure efficiencies and that all information and provided services are accessible, regardless of the individual's abilities or disability.

The Career Center will also serve as a Ticket to Work site for populations with disabilities.

The effectiveness of the established referral process, service delivery and service accessibility will be regularly monitored and evaluated, and any identified necessary changes will be implemented accordingly.

Section 9: Temporary Assistance for Needy Families Functions

A. A description of the Local Board's implementation timeline and planning activities for TANF (e.g., strategies for improving customer intake, service coordination, client monitoring and tracking, targeting employment services to low-skill, low-wage workers, etc.)

The Board's goal is to ensure that Temporary Assistance for Needy Families (TANF) recipients have the skills needed to become self-sufficient and to advance on a career path to middle- and high-skill jobs. Therefore, the Director of Anne Arundel County Department of Social Services (DSS) is a member of the Board, and Anne Arundel Workforce Development Corporation (AAWDC) is the TANF provider for job readiness and job placement services.

AAWDC staff is co-located with DSS in the Glen Burnie and Annapolis offices. AAWDC staff provides essential skills workshops, life skills and job readiness training, case management, barrier removal, career exploration, hard skills enhancement/occupational training, work and learn opportunities, connection to employment, and follow up and retention services to TANF recipients to ensure that they are self-sufficient.

The Board will be also put an emphasis on working with adults and their children at the same time to implement two generational approach.

B. A description of the implementation and coordination process to enhance the provision of services to individuals on TANF that includes:

o Potential co-location of LDSS and/or WIOA Partners at AJCs or LDSS depending on the nature of local partnerships and operations

AAWDC has been providing job readiness and placement services for TANF population for almost 9 years. For easy referral, AAWDC staff has been co-located with the DSS offices in Glen Burnie and Annapolis. The DSS locations will serve as affiliate career centers to provide services not only to TANF population but for all DSS clients.

o Leverage existing financial and in-kind contributions to the WIOA system

AAWDC will use TANF funds first to provide career readiness, occupational and essential skills training, and barriers removal. Then, the Workforce Innovation and Opportunity Act (WIOA) funding will be blended in to move TANF participants to career pathways and placement at a family sustaining wage.

o Cross train and provide technical assistance to all WIOA Partners about TANF

The State of Maryland has required TANF to be a core partner, and therefore the Anne Arundel County Alignment Committee has discussed integrated staff trainings and ways to share information between all partners on a regular basis. This is a prerequisite for creating a common intake process and integrated service delivery system. The Alignment Committee includes local DSS representatives and information about TANF will be discussed and presented at those trainings and included in the distribution materials.

o Ensure that activities are countable and tracked for the TANF Work Participation Rate (WPR)

AAWDC contributes to DSS work participation rate (WPR) calculations through a shared tracking databases. AAWDC is responsible for participation rate calculations and population of relative tracking

databases. AAWDC also provides weekly, monthly, quarterly, and annual reports in accordance with DSS requirements.

- **Access to business services and employer initiatives**

AAWDC will continue to operate and expand its Work Experience initiative, which constitutes the placement phase where clients are matched with potential unsubsidized employment opportunities. Qualified and pre-screened clients could also be referred to entry-level jobs. A Talent Acquisition Specialist is tasked to implement these strategies of connecting clients with meaningful job experiences that lead to full-time employment.

- **Contribute and provide baseline outcomes data to the WIOA system**

The Alignment Committee is exploring ways to share client level data among partners. In the meantime, the reports will be shared on a regular basis with all partners.

The Board's vision is to adopt Benchmarks of Success developed by the WIOA Performance Workgroup.

- C. A description of the LDSS representation on the Local Board to ensure that TANF expectations, roles, and responsibilities are addressed in the Local Area.**

Local Director for the Department of Social Services serves on the Local Board and also participates on the Alignment Committee.

- D. Provide a description of what strategies the Local Board will employ to support TANF recipients in accessing skills and credentialing, life management skills, and employment to improve the financial status of those exiting the TANF program.**

Workforce development services are being provided by AAWDC as DSS vendor. Those services include: barrier and skills assessments, career coaching, facilitation of trainings and work and learn opportunities, provision of supportive services as well as referral to other partners, job development and follow up activities.

Section 10: Community Service Block Grant Functions

A. A list of Community Service Block Grant (CSBG) providers in the Local Area and whether they provide employment and training activities.

CSBG provider in the area is the Anne Arundel County Community Action Agency. They provide the following services and conduct the following activities for county residents:

- a. Education Opportunity Center
- b. Expansion of youth employment and training programs – especially targeting disconnected youth
- c. Will have CAA staff trained to facilitate workforce training program for disconnected youth. As a result, potential participants will be referred to the Career Center.
- d. Have Partners' staff meet with youth in CAA programs to discuss business sector opportunities in Anne Arundel County and surrounding area. As a result, potential participants will be referred to the Career Center.

B. A description of the implementation and coordination process to enhance the provision of services to individuals on CSBG that includes:

• Potential co-location of Community Action Agencies (CAAs) and/or WIOA Partners at American Job Centers or CAAs depending on the nature of local partnerships and operations;

At this moment, CAA is not planning to collocate with any of the partners. However, a process of cross staff training and referrals is being implemented to ensure the flow of services.

• Leverage existing financial and in-kind contributions to the WIOA system to ensure coordination of services provided by multiple programs, creating a seamless approach to delivering services;

Referral process will ensure the seamless approach to service delivery.

• Cross train and provide technical assistance to all WIOA Partners about CSBG;

Staff participate in Partner staff meetings to learn about each other's programs as well as educate on CAA programs. This will also allow for developing efficient strategies and tool for service delivery in the county.

• Ensure that activities are countable and tracked for CSBG performance metrics;

CAA will be using CAP60, HCO, and other programs to track CSBG activities and metrics. CAA reports performance numbers to MD DHCD, which provides the Federal pass-thru funding for the State of Maryland, on an annual basis.

• Access to business services and employer initiatives to attract and better serve employers by marketing joint services, minimizing the burden on employers who use the centers, and provide employer-focused services through a single point of entry rather than through all partnering programs; and

CAA business service staff will become a member of the county Business Services Team that is tasked with developing more efficient and streamlined strategies for addressing business needs and facilitate business engagement.

• Contribute and provide baseline outcomes data to the WIOA system through strategies for collecting and reporting varied program reporting requirements.

Community Action Agency will develop an outcomes dashboard in alignment with the Benchmarks of Success methodology. This information will be shared with the Partners to be included into the county workforce system dashboard.

C. A description of the CAA representation on the Local Board to ensure that CSBG expectations, roles, and responsibilities are addressed in the Local Area.

Community Action is a member of AAWDC's Alignment Committee.

Section 11: Jobs for Veterans State Grants Functions

A. A description of how the Local Board will provide priority of service to veterans and their eligible spouses.

The Board will review and update the policy on priority of service for the local area (see Attachment 2 for policy development timeline) which will be based on the State Policy Issuance 2016-04, which will describe a process of providing services to veterans and their spouses before serving other population categories. After determining veteran status, client can continue to be served by the Wagner Peyser (WP) staff or referred to Disabled Veteran's Outreach Program Representative for additional services if significant barriers to employment (SBE) were identified.

The policy will include the following provisions:

A Veteran is defined in United States Code Title 38 Section 101 as *a person who served in the active military, naval, or air service, and who was discharged or released therefrom under other conditions other than dishonorable.*

An eligible spouse is defined In Title 38 Chapter 41 as *an eligible person.* Eligible person is broken down into three (3) considerations:

1. The spouse of any person who died of a service-connected disability;
2. The spouse of any member of the Armed Forces serving on active duty who, at the time of application for assistance under this chapter, is listed pursuant to Section 556 of Title 37 and regulations issued thereunder, by the Secretary concerned in one or more of the following categories and has been so listed for a total of more than ninety days:
 - a. Missing in action;
 - b. Captured in line of duty by a hostile force; or,
 - c. Forcibly detailed or interned in line of duty by a foreign government or power;
 - d. The spouse of any person who has a total disability permanent in nature resulting from a service-connected disability or the spouse of a veteran who died while a disability so evaluated was in existence.

The Workforce Innovation and Opportunity Act further defines what it means to be considered a spouse as a Dislocated Worker in Section 3 15(E)(i), 15(E)(ii), 16(A)(ii):

- is the spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of title 10, United States Code), and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member; or
- is the spouse of a member of the Armed Forces on active duty and who meets the criteria described in paragraph is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment;
- is the dependent spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of title 10, United States Code) and whose family income is significantly reduced because of a deployment (as defined in section 991(b) of title 10, United States Code, or pursuant to paragraph (4) of such section), a call or order to active duty pursuant to a provision of law referred to in section 101(a)(13)(B) of title 10, United States Code, a permanent change of station, or the service-connected (as defined in section 101(16) of title 38, United States Code) death or disability of the member.

B. A description of how the Local Board will engage Local Veterans Employment Representatives in engaging and providing services to local businesses.

Through collaboration with Veterans Employment and Training Service (VETS), DLLR administers the Jobs for Veterans State Grant (JSVG) Program, which allows for Veterans with significant barriers to employment to receive tailored employment and training services.

If veterans require additional skills necessary to obtain employment in the civilian world, they are being referred to career center staff and supportive services providers. This process has been smooth in sharing resources, data, and expertise; the Board will continue this strategy. At the same time, the Board will continue improving the mechanisms of engaging Local Veterans Employment Representatives into its work with local businesses.

Local Veterans Employment Representatives (LVERs) are parts of the Anne Arundel County Career Centers. In addition, the LVER is a member of the Anne Arundel County Business Services Team and works closely with businesses to promote the hiring of veterans in addition to other services that include recruitments, job fairs, and other projects. DLLR business representatives will receive access to Salesforce system to make sure information is being shared in the most efficient way. The teams will continue to discuss possibilities for more integration and collaboration.

The Career Center houses Disabled Veterans Outreach Program (DVOPs) specialists who provide intensive services to meet the employment needs of disabled veterans and other eligible veterans, with the maximum emphasis directed toward serving those who are economically or educationally disadvantaged, including homeless veterans, and veterans with barriers to employment.

The Board emphasizes the focus of services on transitioning veterans since Fort Meade campus is located in the Local Area and houses a high number of military branches.

Section 12: Trade Adjustment Assistance for Workers Program Functions

A. A description of how Trade Adjustment Assistance services will be provided in the American Job Center system within the Local Area.

The program provides aid to eligible workers who lose their jobs, or whose hours of work and wages are reduced, as a result of increased imports or production transfers abroad. The Trade Program, which is considered to be part of Maryland's WIOA System, is a federal program that offers a variety of benefits and services to workers whose employment has been adversely impacted by foreign trade. Through a number of benefits and services, the Trade Program provides trade-affected workers with opportunities to obtain the support, resources, skills, and credentials they need to return to the workforce in a good job. These include employment and case management services, training, job search allowances, relocation allowances, reemployment and Alternative/Reemployment Trade Adjustment Assistance (ATAA/RTAA) wage subsidies for older workers, and income support in the form of Trade Readjustment Allowances (TRA). The TAA State Merit Staff reviews and makes the final determination on the retraining plan, ensuring it meets the federal requirements under the Trade Act. The Trade Act program is administered, staffed and implemented by DLLR, local workforce areas, and the Unemployment Insurance Division.

Section 13: Unemployment Insurance Functions

- A. A description of how Unemployment Insurance claimants will be supported by the American Job Center system within the Local Area. This description should include how the Local Board will utilize the Wagner-Peiser program to provide access to local workforce development services for Unemployment Insurance claimants.**

DLLR focuses its efforts on individuals who are receiving unemployment benefits. It provides regular workshops and information session for these individuals to help them to return back to work as quickly as possible. Due to colocation Wagner-Peyser and Dislocated Worker services staff work closely to assess individuals who may have barriers to returning to work, and quickly enroll them into the Dislocated Worker services. Individuals who do not seek any services except for Unemployment Insurance (UI) benefits, will be provided with relevant materials and guidance as well as access to computers with links to UI registration resources.

Section 14: Senior Community Service Employment Program Functions

A. A list of Senior Community Service Employment Program providers in the Local Area.

Only one SCSEP service provider is operating in the area, Senior Service America, Inc.

B. A description of how Senior Community Service Employment Program services will be provided in the American Job Center system within the Local Area.

SCSEP representatives participate on the Alignment Committee as a partner and are involved in the workforce system development process. SCSEP recruitment and intake events are also conducted at the Career Center. At the same time, the center provides training opportunities for SCSEP customers in the form of internships.

Section 16: WIOA Section 188 and Equal Opportunity Functions

- A. A designation of the local Equal Opportunity Officer, including their name, location, email, and telephone number.**

Milena Kornyl,
Anne Arundel Career Center, 613 Global Way, Linthicum Heights, MD
mkornyl@aawdc.org 410-424-3240

- B. A description of how entities within the American Job Center delivery system, including American Job Center operators and the American Job Center partners, will comply with Section 188 of WIOA, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing the needs of individuals with disabilities.**

The Board will review the current assurances and update as necessary (see Attachment 2 for policy development timeline). The Board will also request a staff training on disability issues for all system partner.

- C. An acknowledgment that the Local Board understands that, while Section 188 of WIOA ensure equal opportunity for individuals with disabilities, sub-recipients may also be subject to the requirements of:**
- a. Section 504 of the Rehabilitation Act, which prohibits discrimination against individuals with disabilities by recipients of Federal financial assistance;**
 - b. Title I of the ADA, which prohibits discrimination in employment based on disability;**
 - c. Title II of the ADA, which prohibits State and local governments from discriminating on the basis of disability;**
 - d. Section 427 of the General Education Provisions Act; and**
 - e. Maryland Anti-Discrimination laws**

The Board acknowledges that all service providers, including sub-recipients, may be subject to the following provisions of law (see Attachment 2 for policy development timeline):

- Section 188 of the Workforce Innovation and Opportunity Act, which prohibits discrimination on the grounds of race, color, religion, sex, national origin, age, disability, political affiliation or belief and requires that reasonable accommodations be provided to qualified individuals with disabilities in certain circumstances.
- Section 504 of the Rehabilitation Act, which prohibits discrimination against individuals with disabilities by recipients of Federal financial assistance.
- Title I of the Americans with Disabilities Act, which prohibits discrimination in employment based on disability.
- Title II of the Americans with Disabilities Act, which prohibits State and local governments from discriminating on the basis of disability.
- Section 427 of the General Education Provisions Act, which requires recipients to ensure equitable access to, and participation in, certain programs run by the U.S. Department of Education

- Maryland’s Anti-Discrimination Laws, which prohibits discrimination on the basis of marital status, sexual orientation, gender identity, or genetic information in addition to those covered by Section 188 above.

The Board will review the current assurances and update as necessary.

D. Describe how the Local Board will ensure meaningful access to all customers.

An Alignment Committee has been assembled to ensure that all customers and clients have access to Career Center services and are able to navigate the system. In addition, a Career Center committee was established to provide a venue for coordination and alignment of services provided by partners located in the Career Center. These services will include services provided to individuals with disabilities and veterans.

The Board supports development of the client centric design at the career center which identifies each client’s individual needs and provides appropriate services. A client centric design group that included representation from DLLR, DORS and AAWDC completed a Course on Human Centered design and submitted a Customer Centered Design project proposal for the White House Learning Exchange & Celebration. The group’s project was one of the 15 projects chosen to come to the White House and present their concept for a new Anne Arundel County Career Center (Attachment 4).

Improving client flow with a more efficient intake system (as described above) at every entry point will provide more information to the clients, setting appropriate expectations regarding services being offered will result in a more meaningful access to services.

Cross agency trainings will be conducted to provide staff of various entry points/locations necessary skills and knowledge so the same array of basic services could be provided in those locations, which would create meaningful access for all clients.

E. A description of the Local Board’s procedures for handling grievances and complaints from participants and other interested parties affected by the local American Job Center system, including partners and service providers. Provide a separate description for the:

The Board created detailed guidelines and will create a policy. (see Attachment 2 for policy development timeline and Attachment 3 for the Guidelines)

- a. Complaints alleging discrimination on the ground of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries only, citizenship or participation in any WIOA Title I – financially assisted program or activity;
- b. Complaints and grievances not alleging illegal forms of discrimination. This includes grievances from individuals alleging labor standards violations.
- c. Remedies that may be imposed for a violation of any requirement under WIOA Title I, limited to, suspension or termination of payments under the title; prohibition of placement of a participant with an employer that has violated any requirement under WIOA Title I; reinstatement of an employee, payment of lost wages and benefits, and reestablishment of other relevant terms, conditions, and privileges of employment (where applicable); and other equitable relief as appropriate.

F. A description of the Local Board’s policy and procedures with regard to aid, benefits, services, training, and employment, include a statement of assurance that you will provide

reasonable accommodation to qualified individuals with disabilities unless providing the accommodation would cause undue hardship.

The Board will review the existing guidance and create a policy (see Attachment 2 for policy development timeline).

G. A description of how the Local Board will comply with the Americans with Disabilities Act. The description should include how the Local Board will provide reasonable accommodations regarding materials, technology, and physical and programmatic accessibility of facilities. The description should also include how the Local Board will provide staff training and support for addressing the needs of individuals with disabilities.

The Board will review the existing guidance and create a policy (see Attachment 2 for policy development timeline).

Maryland Division of Rehabilitation Services, as a Core Program Partner, will provide staff and partner training and support for addressing the needs of individuals with disabilities at least one time annually at the Anne Arundel County Career Center. In addition, the Board will request Maryland Division of Rehabilitation Services, as an in-kind contribution, an evaluation of the Centers in the local area to identify areas that may need to be corrected or enhanced to ensure compliance with the Americans with Disabilities Act. Included in the evaluation will be accessibility, assistive technology, rest room availability, and support materials.

The Board will provide reasonable accommodations to qualified individuals with disabilities unless providing the accommodations would cause undue hardship.

H. A description of the Local Board's policy and procedures in place to ensure that communications with individuals with disabilities, including individuals with visual or hearing impairments, are as effective as communications with others.

The Board will review the existing guidance and create a policy (see Attachment 2 for policy development timeline).

The Board has made serving individuals with disabilities a priority by ensuring buildings and services are accessible. At the time of the Maryland Division of Rehabilitation Services evaluation, the Board is requesting they review methods of communication and provide suggestions for improvement.

I. A description of the steps the Local Board will take to meet the language needs of limited English speaking individuals who seek services or information. The description should include how the Local Board proposes that information will be disseminated to Limited-English proficiency, including using oral interpretation and written translation, services in accordance with Maryland Anti-Discrimination laws, including Code Ann. 10-1102-1103, which stipulates that oral language services must be delivered on-site for those in frequent contact with a service provider.

In order to meet the language needs of non-native speakers some documents will be translated into foreign language (Spanish). Also, a roster of employees and their language skills will be created which would include contact information. This roster will be made available to client facing staff in case an individual does not speak English. In addition, relationships with community organizations that work with foreigners will be established and used as a translation and other supportive services resources.

Section 17: Fiscal, Performance and Other Functions

- A. An identification of the entity responsible for the disbursement of grant funds described in section 107(d)(12)(B)(i)(III), as determined by the chief elected official or the Governor under section 107(d)(12)(B)(i).**

AAWDC is responsible for administering workforce development programs in accordance with the Title 14 § 3-14-102 of the Anne Arundel County Charter.

- B. A description of financial sustainability of the American Job Center services with current funding levels, and a description of the ability to make adjustments should funding levels change.**

Through the efficient MOU and RSA, the area is able to sustain the current performance level of operating AJC. If changes to funding occur, the Board will reevaluate the expenditures and consult with all the Partners to determine the most efficient service level and solution for continuing operations.

- C. A description of the competitive process to be used to award the subgrants and contracts in the Local Area for activities carried out under this title, including risk assessment of potential subgrantees and contractors.**

Anne Arundel Workforce Development Corporation (AAWDC) has a procurement process that details the competitive selection procedures. The procedures prescribe for preparation of the Request of Proposal (RFPs) that include Board advisement. A Board review subcommittee makes a selection and recommends to the full Board as to the vendor. AAWDC contracts with the vendor. Risk assessment will become a part of the selection process. (see Attachment 2 for policy development timeline).

- D. A description of the actions the Local Board will take toward becoming or remaining a high-performing board, consistent with the factors developed by the State board pursuant to Section 101(d)(6); This should include a description of the process used by the Local Board to review and evaluate performance of the local American Job Center(s) and the One-Stop Operator.**

The Board will comply with Sections 107 and 116 of the Workforce Innovation and Opportunity Act (WIOA) through following requirements as to the Workforce Development Board structure and performance. In particular, the Board will review quarterly predictive reports that show WIOA performance indicators. The Governance committee will be tasked with oversight of performance and funding.

In addition, the Board will be conducting and reviewing an on-going analysis of WIOA programs' outcomes that look at trends, causal relationships, and impact of the local area; making decisions accordingly if needed. A Scorecard with the outcome of each partner will be developed and reviewed at Alignment Committee meetings.

The Board will strongly encourage all staff who work with clients and customers to participate in all trainings provided by the Maryland Department of Labor, Licensing and Regulations (DLLR) and U.S. Department of Labor relating to meeting performance standards. Staff may also attend other professional development trainings and conferences such as the National Association of Workforce Development

Professionals (NAWDP) and other employment and trainings opportunities as appropriate. At the same time, all service providers (vendors) will receive periodic trainings on performance standards and strategies.

The Board will require AAWDC to conduct an annual independent evaluation of **the one-stop operator**.

E. A description, including a copy of, of the Local Area’s Individual Training Account policy. The description should include information such as selection process, dollar limits, duration, etc. and must be in accordance with the State’s WIOA Title I Training and the Eligibility Training Provider List policy.

The Board will create a section in **case management policy** (see Attachment 2 for policy development timeline). The policy will be approved following implementation of sector strategies and development of career pathways.

Current guidance for the development and approval of ITAs is as follows:

WIOA Sec. 134(c)(3)(G)(iii) states that “[t]raining services provided under this paragraph shall be directly linked to an in-demand industry sector or occupation in the local area or the planning region.” As such, the Board limits individual training to those industries and occupations that the Local Workforce Development Board deems in-demand. Those industries and occupations are identified on the documentation that clients received at intake.

The Board seeks to provide training opportunities within high-demand industries or occupations that aligns with one of the following **H.I.T.C.H.** categories:

Hospitality, Retail, & Tourism

Information Technology & Professional Services (Project Management; Accounting/Bookkeeping; Administrative, etc.; Scientific and other technical services)

Transportation/Logistics/Warehousing

Construction, Trades, & Manufacturing (Welding; Interior Design; Carpentry, etc.)

Healthcare & Social Assistance (Allied health professionals; counseling, etc.)

The Board has set a spending cap on all ITAs of \$3,000.00. This cap is reviewed on an annual basis. In all cases, the Board seeks to provide high-value training solutions by operating cohort trainings in the most in-demand and popular occupations and industries in the local area.

F. A description of how training services under chapter 3 of subtitle B will be provided in accordance with Section 134(c)(3)(G), including, if contracts for the training services will be used, how the use of such contracts will be coordinated with the use of individual training accounts under that chapter and how the Local Board will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided.

The Board will create a section in **case management** policy (see Attachment 2 for policy development timeline).

Training services will be provided in accordance with 134(c)(3)(G) of the Workforce Innovation and Opportunity Act. Training services provided will maximize client’s choice in the selection of an eligible

provider of such services. As required in the Workforce Innovation and Opportunity Act, training services shall be directly linked to an in-demand industry sector or occupation or related entry level career path course of study.

The Board will support both Individual Training Account (ITA) and On-the-Job training (OJT) models for training. OJTs are an example of a larger work & learn strategic priority of the Local Board and provide work experience for clients before they are hired and an opportunity for businesses to teach a potential employee and evaluate their suitability for the job. ITAs provide an opportunity for a client to study for and obtain certification or other credential through a training provider, which would allow him/her to obtain employment at the end of the study. The clients will be able to decide on the training and career track utilizing Labor Market Information provided to them.

G. A description of how the American Job Centers are utilizing the Maryland Workforce Exchange as the integrated, technology-enabled intake and case management information system for programs carried out under WIOA and programs carried out by American Job Center partners.

The Board recommends using the Maryland Workforce Exchange (MWE) program to track WIOA funded activities and outcomes. The Office of Research, Performance, and Compliance conducts regular trainings for staff on various aspects and policies of MWE utilization. In addition, staff participate in trainings and webinars on this topic administered by the State.

It is also very important to make sure that activities of mandatory and non-mandatory partners are included in the database. They will be provided with the limited level access to the participant records and given an opportunity to record some activities through setting up generic programs. At this point, DLLR is using the program to track Wagner-Peyser clients; access to Division of Rehabilitation Services (DORS) and Anne Arundel Community College (AACC) staff is being discussed.

H. A description of the Local Board's procedures for conducting oversight and monitoring of its WIOA activities and those of its subgrantee and contractors. The monitoring plan shall address the monitoring scope and frequency and shall include the following:

- a. The roles and responsibility of staff in facilitating this procedure;
- b. A requirement that all subgrantee agreements and contracts be monitored at least annually;
- c. Procedures for determining that expenditures have been made against the cost categories and within the cost limitations specified in the Act and WIOA regulations;
- d. Procedures for determining compliance with other provisions of the Act and regulations and other applicable laws and regulations, including the method of monitoring to be used for subgrantees and contractors;
- e. Provisions for the recording of findings made by the recipients' monitor(s), the forwarding of such findings to the subgrantee or contractor for response and the recording of all corrective actions;
- f. Provisions of technical assistance as necessary and appropriate; and
- g. Specific local policies developed by the Local Board for oversight of the American Job Center system, youth activities and employment and training activities under Title I of WIOA

The Board created a "Quality Assurance Guidelines" policy that describes these procedures (see Attachment 5 for the policy).

I. A description of the Local Board's policy and procedures regarding the handling of personally identifiable and confidential information.

In accordance with Federal and State Law, individuals applying for the Workforce Innovation and Opportunity Act or other funded services must be provided an opportunity to submit written authorization allowing the service provider to share their personal and confidential information and records. Each individual must also be informed that they can request their personal and confidential information not be shared among the partner agencies of the workforce system and this request does not affect their eligibility for services. If an individual declines to share their personal and confidential information and is eligible for and receives services, the Board will work with the State to identify a pseudonym to document the participant's program services.

The Board **created** a policy on handling PII (see Attachment 2 for policy development timeline).

J. A description of the Local Board's procurement system, including a statement of assurance that the procedures conform to the standards in DOL regulations set forth in 29 CFR Part 95, Part 97 and 2 CFR 200.

AAWDC is in compliance with the 29CRF Part 95, Part 97 and 2 CFR 200.

- a. As a non-profit 501(c) organization, AAWDC has established procurement regulations that meet the requirements of Anne Arundel County and all Federal requirements delineated below. These regulations have been reviewed by AAWDC's attorney and approved by the AAWDC Corporate Board of Directors (CBOD).
- b. AAWDC Procurements will comply with WIOA and WIOA Final Rules, when published, as well as standards established by the State. Property contracts will adhere to Property Management Procedures taken from the Office of Management and Budget, OMB Circular 2 CFR 200 Uniform Administrative Guidance. Major service providers will be selected by utilizing the Competitive Bid or Request for Proposal formats. Selection of all service providers will be based on the vendor's ability to demonstrate prior effectiveness in the performance standard goals; provide fiscal accountability and cost effectiveness; and serve the targeted population. Proper consideration shall be given to the community-based organizations based on cost, quality of training, characteristics of participants, and meeting performance goals.
- c. Sole-source contract may be necessary for services not available by multiple vendors or by vendor ability/knowledge to perform necessary service. Sole-source procurements will be justified in accordance with the criteria in Chapter II-10 of the One-Stop Technical Assistance Guide.
- d. Duplication of services or facilities available from federal, state, or local funds will not occur unless it can be demonstrated that alternative services or facilities are more effective or contribute to the achievement of the Anne Arundel County Workforce Development Area's goals.
- e. Local Education Agencies will be given the opportunity to provide services unless it is demonstrated that alternative agencies would have a greater potential to enhance the participant's occupational and career growth.
- f. AAWDC will not fund any skills training unless the level of skills provided in the program is in accordance with any guidelines which may have been established by the Board.
- g. AAWDC and the Board agree to adhere to a code of conduct and procedures to avoid conflict of interest, or the appearance of such conflict, in the exercise of their responsibilities, particularly those relating to the awarding of contracts. All members of the Board and the AAWDC Corporate Board of Directors (CBOD) must sign a Conflict of Interest Statement as a condition of their continued membership. The standards governing the conduct and performance of members of the Board (as noted on its by-laws), its officers and staff, AAWDC CBOD members and authorized agents who are

engaged in the procurement of goods and services using federal funds. Except as otherwise permitted or provided by federal, state, or local laws, rules, and regulations, the following provisions shall apply:

- h. The Board members, AAWDC CBOD members or AAWDC employees will not be permitted to participate in the selection or award of a contract supported by federal or state funds if there is an apparent conflict of interest.
- i. The Board members, AAWDC CBOD members or AAWDC employees will not be permitted to solicit or accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to any agreement, or to accept gratuities, favors, or anything of a monetary value in excess of \$35.00 from contributors, etc.
- j. The Board members, AAWDC CBOD members or AAWDC employees will not be permitted to use any knowledge gained through their position for personal profit or the profit of family or associates.
- k. Conflict of interest standards cover Board members, AAWDC CBOD member or AAWDC employees who are involved on the procurement process in which their relationship to the award recipient could be categorized as:
 - a. The member, officer, employee or authorized agent;
 - b. Any member of his/her immediate family;
 - c. His/her business partner;
 - d. Any organization which he/she belongs to or that employs any of the above, or has a financial interest in the firm being considered for an award.

These internal regulations define the levels of procurement and the different requirements of competition for each level.

The procurement process is as follows and will be outlined in the procurement policy (see Attachment 2 for policy development timeline):

- For large procurements, RFP's are developed, widely issued, advertised when necessary, proposer conferences are held, proposals are rated and ranked based on established, know criteria and the best proposer is objectively selected;
- For more routine purchases, needs are identified by initiative director/authorized staff;
- The level of approval and requirements for competition as defined by procurement regulations are assessed by the initiative director;
- Criteria in the procurement regulations are applied and when necessary, competing prices are determined via catalog, internet, or telephone as appropriate; at least three prices for equivalent items are entered on the form designed for this purpose including the recommended source;
- The initiative director reviews the proposed purchase to determine if the item is a valid program need, if the competitive prices are sufficient and if the recommended source is appropriate; if so, the initiative director will verify that the contractor/vendor is in good standing with the Federal Government and the State; this is done through SAM and SDAT;
- If so, the signed approved fiscal request form and backup documentation is forwarded to the fiscal unit for the order to be placed.
- For routine office supplies, purchases are approved by the initiative director and sent to the fiscal unit to be ordered. Orders are sent directly to the office needing the supplies and a staff member at the office will verify the order was completely received by signing off on the shipping invoice and/or responding to the fiscal unit by e-mail that the order was received and complete.

K. A description of any documentation to demonstrate that the acquisition, management, and disposition of property adhere to the Property Management Procedures taken from DOL regulations.

2 CFR Part 200. Items of value, as they are acquired, are tagged and added to the Property Inventory. The inventory is verified by an on-site review annually of each location. Inventory is updated when items are received, moved, re-purposed, and or removed.

- Items determined to be working, fully depreciated, but no longer needed are moved to loading where it is determined if it can be repurposed.
- Items that are not working, yet not fully depreciated must be review by the Chief Financial Officer to determine how to be handled.
- Items that are not working, fully depreciated and not needed are disposed of properly and removed from the inventory.

L. A description of any policies or procedures the Local Board adopted to avoid conflicts of interest or the appearance of such conflicts in the exercise of their responsibilities, particularly those related to the awarding of contracts.

The Board **created** a policy (see Attachment 2 for policy development timeline).

M. A description of the Local Board or fiscal agent’s accounting procedures, including the procedures used in preparing reports to the State. In addition to the requirement that all financial transactions be conducted in compliance with Generally Accepted Accounting Principles (GAAP), the fiscal management system must include the following in the accounting procedures. This description must address how the fiscal system:

- **tracks funding types, funding amounts, obligations, expenditures and assets.**

The primary accounting system is QuickBooks Premier, supplemented by Excel spreadsheets as needed. Each grant and each cost pool is assigned a ‘class’ in the accounting system and an excel budget to actual report is set up according to the approved spending plan. All vendor invoices are approved by the initiative director before being entered into the accounting system for tracking/payment/reporting where each expense is assigned to the class associated with the appropriate grant or cost pool. The **Controller** reviews each expense posting to the accounting system and the President reviews each expense when the cash is disbursed. Payroll is reviewed by the **Controller** & President to ensure staff charging time to grants aligns with the staffing plan. Summary reports of expenses by grant are reviewed by the initiative director and **Controller** monthly to ensure costs are properly assigned and do not exceed funding levels and the President reviews these reports at least quarterly.

Obligations are tracked on Excel worksheets designed to capture every contract or other commitment. Reports are prepared monthly to track the progress of grants and prevent over-commitment.

Assets with an expected useful life of at least one year are tagged with a sticker and logged on an Excel worksheet with their value, description, and location. This list is updated as items are acquired or disposed of, with a full review every other year. In addition to the above, assets valued over \$5,000 are recorded as fixed assets in the accounting system and depreciated over the course of their expected useful life.

- **permits the tracking of program income, stand-in costs, and leveraged funds.**

The primary accounting system, QuickBooks, has several revenue “accounts”: some that are used for the grants and others that would be used for program income. If a grant program generated income, the

inflow of resources would be assigned to the class associated with the grant and with one of these program income accounts. This would allow the income and costs to be associated and for reporting to the granter.

Leveraged funds are first budgeted in the Excel budget and budget-to-actual tools to point towards the class where they will be funded.

Stand-in costs are initially charged to the grant and then removed to another funding source with a flag in the Excel reporting tool pointing towards the new location of the cost.

To support reporting, stand-in costs and leveraged funds are associated with one of two specific classes in the primary accounting system and a comment is inserted associating them with the grant being leveraged or potentially needing the stand-in cost to make the costs easier to find and add to the Excel tools.

○ **is adequate to prepare financial reports required by the State**

State fiscal reporting requires tracking costs on the bases of budgets, cash disbursements, accruals, and obligations. Each grant has an Excel budget which may be broken down by cost center and is also consolidated on a corporate basis. These budgets tie to our internal chart of accounts but contain a “cross-walk” that ties to the State’s reporting categories to simplify reporting. The primary accounting system has automated reporting for both cash and accrual basis costs. For accrual basis numbers, we also enter monthly accruals for unbilled costs that have been earned based on our obligation tracking system. Obligations are tracked on several obligation Excel or Google spreadsheets which are customized for the types of agreements creating the obligation.

N. An identification of key staff who will be working with WIOA funds.

WIOA funds are managed by a team consisting of the President & CEO and members of the Executive Team and spending requests may come from staff directly involved in providing services funded through WIOA.

O. A description of how the Local Board’s (or fiscal agent's) financial system will permit tracing of funds to a level adequate to establish that funds have not been used in violation of WIOA standards or DOL regulations.

The fiscal agent’s system can produce reports down to the transactional level by grant and by budget line item. Detailed backup is retained for at least **two years on site**, allowing auditors and monitors to trace use of funds from the state reports to the accounting system to the approved source document. This system is framed by internal controls that include qualified staff, compliance training, policies & procedures, segregation of duties, and internal reviews by multiple staff of WIOA spending.

P. Provide a brief description of the following:

○ **Fiscal reporting system**

The financial reporting system is a combination of a well-established, multi-user accounting system (QuickBooks Premier) supplemented by linking spreadsheets and a third-party payroll processor (Paylocity) providing payroll reports and online timesheets. QuickBooks is the engine for capturing all costs and producing expenditure reports. It is supplemented by Excel worksheets, that can receive imported data, to produce reports in customized formats and track budget progress; and that track obligations.

○ **Obligation control system**

Obligations for training are recommended by the Navigators and Career Coaches and approved by the initiative director if it fulfills program goals and fits within the program budget. The obligating document is forwarded to the fiscal office for validation and tracking. Other obligations like contracts and sub-grants are requested by the initiative director, prepared in the fiscal office, and signed by the President & CEO. Obligations are controlled using Excel spreadsheets that list each obligation separately and subtotals them by grant and budget line item, while enabling the calculation of month-end accruals. These spreadsheets are reviewed at least monthly with the initiative director to verify completeness and to identify amounts needing to be de-obligated.

○ **ITA payment system**

Invoices/bills for the training are sent directly to the fiscal unit which reviews the document in accordance with the terms of the Individualized Training Account (ITA), the bill is matched to the original ITA to ensure that: the ITA has been signed by both parties; the bill amount does not exceed the ITA amount (by more than 10%); client information is correct; outcome documentation is for the training as listed on the original ITA. Copies of the outcome documentation are sent to the program to be placed in the client file.

○ **Chart of account system**

The fiscal agent's chart of accounts is set up in accordance with Generally Accepted Accounting Principles and has more than enough designations to separate assets, liabilities, direct program costs by every category required by the state, and the allocation of indirect administrative costs. In instances where multiple accounts need to be combined for state reports, a cross-walk is created in the grant's Excel budget that indicates which accounts become part of each report line item.

○ **Accounts payable system**

When possible and practical, obligating documents such as contracts or Purchase Orders are created in advance of expenses being incurred.

After the service(s) is performed or materials purchased, invoices are sent by vendors to corporate headquarters where they are date-stamped and forwarded to the accounting analyst. The accounting analyst validates all invoices, including coordinating approval from the initiative director that the cost was intended, allowable, and satisfactorily received. Then the invoice is entered into the accounting system for payment and reporting. The appropriate grant and chart of accounts line is charged according to the budget. Reimbursement is requested and the invoices are aged, when possible, or paid immediately when required. Aged invoices are associated with a reimbursement request and paid no later than three days after the reimbursement is received.

Review of Invoices – The accounting analyst assembles all the invoices ready for payment. The **Controller** reviews the hard copy invoices for proper support documentation and verifies that the cost has

been distributed to the correct general ledger account and grant or cost pool account. The **Controller** initials properly charged bills and forwards them to the aging file.

Check Writing – Based on due dates or reimbursement received from the state, the **Controller** retrieves the appropriate number of blank checks from a locked cabinet and prints the checks using the QuickBooks bill-pay feature. Checks are pre-numbered and are periodically reviewed to ensure that all printed, manual, unused, or voided checks are accounted for sequentially. All checks are reviewed and signed by the President/CEO (**any checks over \$5,000 require two signatures**) then returned to the Accounting Analyst for mailing and filing.

○ **Staff payroll system**

Staff payroll services are managed by the Human Resources Generalist, in conjunction with the **Controller**, using a commercial third-party payroll service provider (Paylocity). The Paylocity system contains payroll data (backed up by employee files) and provides: the calculation of wages, taxes, and leave payments; creation of appropriate reports; and payment and filing of all necessary employer taxes and quarterly reports. All employees **should** have direct deposit of net pay to a financial institution as a condition of employment.

Times of attendance, hours worked and grant/program served are entered daily by employees on two-week, online timesheets. At the end of each bi-weekly pay-period, timesheets are virtually signed by the employee and approved by their immediate supervisor. The fiscal unit verifies that all hours are submitted for every employee. A “pre-process” payroll register is printed and reviewed by the **Controller** before the payroll is submitted to the payroll service for processing. Once the pre-processing register is approved the payroll file is released to the payroll provider.

The payroll provider is responsible for the calculation and disbursement of payroll and all necessary filings and deposits. Detailed payroll reports are printed and reviewed by the President/CEO to ensure funds are being spent correctly and in accordance with the staffing plan. These payroll reports are also used by the accounting analyst to enter payroll costs by grant program into the accounting system, which is verified by the **Controller**.

○ **Participant payroll system**

Youth Programs: For youth programs, particularly summer jobs programs, youth stipends/wages are paid in a separate payroll account using a separate program/organization code. Procedures above otherwise apply.

○ **Participant stipend payment system**

Stipend checks are produced based on the recommendations of Career Coaches in accordance to the requirements of their individual programs. Stipends payments follow the accounts payable procedures. Whenever possible, stipend checks will be made out to the final recipient of the funds rather than the participant. Where applicable, the stipend obligation and payment will be recorded to the obligation log worksheet of the program in question.

Q. A description of the Local Board’s (or fiscal agent’s) cash management system, providing assurance that no excess cash will be kept on hand, and that procedures are in place to monitor cash.

Cash reimbursement requests are submitted to DLLR twice each month and the receivable recorded in the accounting system and Excel cash forecast. WIOA formula funds are received from the County approximately 30 days after the request and non-formula funds are received from DLLR approximately 21 days after the request. Knowing this, cost projections for the expected time to receive requested funds are made for payroll and for other recurring costs (rent, utilities, etc.) based on a trailing three month burn rate. These projections are added to the cash disbursements for the grant and aged invoices associated with the grant so that negative cash on hand (reimbursable disbursements in excess of cash receipts) does not become too great. Aged payables are flagged according to the cash request that includes them so that checks can be written within **five** business days of receipt of the funds.

R. A description of the Local Board's cost allocation procedures including:

o Identification of different cost pools

Whenever possible, costs are charged directly to the appropriate grant program. Specific transactions are directly split between grants/programs when more than one program benefits.

For cases where direct charging is not possible, there are three cost pools to capture costs that are subsequently allocated out to the programs. The Program Cost Pool captures costs that benefit both the WIOA Adult and WIOA Dislocated Worker Programs and is primarily costs related to the management of the Career Center, which benefits everyone who walks in the door regardless of how they are enrolled. The Youth Cost Pool captures costs that either benefit both In-School and Out-of-School youth or where we cannot determine the direct benefit to In-School versus Out-of-School Youth. The Executive and Administrative Cost Pool captures costs that benefit all programs, such as the corporate administration function including Accounting, Human Resources, and the office of the President & CEO.

o Procedures for distribution of staff costs between cost categories (Administrative cost, program cost and indirect cost).

Staff charge their time on the bi-weekly timesheets to the grant(s)/program(s) on which they work or to the indirect pool. The payroll system generates a labor distribution report that subtotals costs per grant and pool. Costs are entered into the accounting system by grant/cost pool according to the share of their actual labor cost based on their timesheets.

o Procedures used for distribution of funds from each cost pool.

The program cost pool is allocated on a quarterly basis to the WIOA Adult and Dislocated Worker grants based on the percentage of new clients enrolled as Adults and Dislocated Workers during the same quarter. The WIOA Youth Cost Pool is distributed between In-School and Out-of-School Youth on the basis of direct costs in each category. The Executive and Administrative Cost Pool is allocated equally to all programs based on direct costs, to the limit of the lesser of the grant approved rate or our Federal approved indirect rate.

o Description of funds included in each cost pool.

Program Cost Pool – The operations of the WIOA Adult and Dislocated Worker grants are closely related and share a number of resources including staff, facilities, equipment, and supplies. In the cases where these costs cannot be easily identified as associated with one or the other grant, they are included in this pool.

WIOA Youth Cost Pool – All WIOA Youth program costs must be categorized as either In School or Out of School costs. Any costs identified as program costs belonging to the WIOA Youth grant that cannot be easily identified as In School or Out of School are included in this pool. This will mostly include costs for facilities, staff, equipment, and supplies used for all Youth activities.

Executive and Administrative Cost Pool – The cost of operating the corporate headquarters, including facilities, certain executive salaries, all fiscal costs and human resources costs are included in this pool and shared as indirect by all programs.

o **Description of cost allocation plans for American Job Centers**

Facilities and shared staff (per the RSA) costs for Career Centers are first divided amongst participating partners on the basis of square footage, and then between WIOA Adult and Dislocated Worker based on the Program Cost Pool plan described above. If any other grant programs worked out of the Career Centers, their facilities costs would be allocated to that program based on square feet directly used. Supplies and personnel-driven charges would be allocated based on headcount.

S. A description of the Local Board's (or fiscal agent's) procedure for collecting debts involving WIOA funds.

The fiscal agent's accounting department invoices and follows up on late invoices on a bi-monthly basis.

Attachment 1 – Anne Arundel County Local Workforce Development Board Member List

Business – 13 Members (52%)

Name & Title	Business/Organization	Industry	Term
H. Walter Townshend (Chair), President/CEO, Emeritus	Baltimore Washington Corridor Chamber	Business Organization	08/31/2020
Kathy Hall, Sr. HR Consultant/VP HR Department	Sandy Spring Bank	Finance	05/31/2020
Judith Emmel, Associate Director, Local, State & Community Relations	National Security Agency	Government	10/25/2018
James Weaver, Owner	Weaver Boat Works	Transportation & Warehousing	01/23/2020
Julie McGovern, Vice President, Human Resources	Anne Arundel Medical Center	Healthcare	05/31/2020
Christie Laffey, Manager, People Department	Southwest Airlines		05/01/2020
Grant Dopheide, Managing HR Business Partner	UM Baltimore Washington Medical Center	Healthcare	07/31/2020
Franchaun Armstead, Senior Recruiter/HR Generalist	iJET International	Information Technology	10/31/2018
Ronald Vogt, President	Maryland Recycle Co., Inc	Manufacturing	11/06/2018
Tom Huesman, President, Terminal Transportation Services	Terminal Corporation		12/31/2018
Nicole Oliver, Administrative Manager	Johns Hopkins Community Physicians	Healthcare	05/31/2020

Labor – 5 Members (20%)

Thomas Pfundstein, Director of Curriculum & Instruction	International Union of Painters and Allied Trades	Apprenticeship	10/31/2018
Timothy Kingston, President	AFSCME Local 2563	Joint Labor- Management	10/25/2018
Dale Waldfroff, Detention Officer/Corporal	Anne Arundel County Detention Center	Joint Labor- Management	10/25/2018

Education – 2 Members (8%)

Deborah D. Kremer, Coordinator, Career & Tech Ed	Anne Arundel County Public Schools	K-12	09/01/2020
Sandra Jones, Assistant Dean, Continuing Profession Education & Special Population	Anne Arundel Community College	Training Provider, Higher Education & Adult Basic Education	12/01/2019

Other Key Partners – 5 Members (20%)

Anita Dewling, Business Development Associate	Anne Arundel Economic Development Corporation	Economic Development	09/01/2018
Andre James, Labor Exchange Administrator	Department of Labor, Licensing & Regulation	Wagner-Peyser	06/30/2020
Michelle Stewart Regional Director, Region 2	MD State Department of Education Division of Rehabilitation	Vocational Rehabilitation	09/01/2018
Bishop Abraham Shanklin, Jr., President & Executive Director	The Center of Transformation	Community	10/31/2018
Carnitra White, Director	Anne Arundel County Department of Social Services	TANF/SNAP	09/01/2019

Attachment 2 – Policy Development Schedule

Anne Arundel Workforce Development System Policy Development Schedule

Policy Subject	Est. Completion	Approval Level	Status
Incumbent Worker		Board	Adopted
Unlikely to Return - Dislocated Worker		Board	Adopted
Priority of Service		Board	Adopted
Procurement and Contract Approval		Board	Adopted
"Quality Assurance Guidelines" Policy		Board	Adopted
Training Services	Q4 FY19	Board	
Underemployed Workers and Self-Sufficiency		Board	Adopted
WIOA Title I Eligibility		Program/Board	Adopted
WIOA Youth Services	Q1 FY20	Board	
Assessment Policy	Q1 FY20	Board	
Selective Service		Operations	Adopted
Supportive Services	Q4 FY19	Board/DLLR	
Discrimination Policy	Q4 FY19	Board	Guidelines adopted
Case Management	Q4 FY19	Operations	Guidelines adopted
Conflict of Interest		Board	Adopted
Individual Employment Plan (IEP)		Operations	Adopted but will become part of Case Management policy
Personally Identifiable Information		Board	Adopted
Solicitation and Selection of One-Stop Operator	Q4 FY19	Board	Guidelines adopted

*Policies in bold are referenced in the Plan

The policy development and approval process is described in the "Policy Development" policy. Policies are drafted at the internal policy group level. Policies then are being sent to all partners for comments (Alignment Committee). Policies that require Board approval are being reviewed either by the Governance Committee or an entire Board.

Attachment 3 – Complaint guidelines

Equal Opportunity Is The Law

It is against the law for AAWDC or its subgrantees, as recipients of Federal financial assistance, to discriminate on the following bases:

Against any individual in the United States on the basis of:

- Race;
- Color;
- Religion;
- Sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity);
- National origin (including limited English proficiency);
- Age;
- Disability; or
- Political affiliation or belief

Against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of:

- Citizenship status or
- Participation in any WIOA Title I financially assisted program or activity

AAWDC or its subgrantees must not discriminate in any of the following areas:

- Deciding who will be admitted, or have access, to any WIOA Title I financially assisted program or activity;
- Providing opportunities in, or treating any person with regard to, such a program or activity; or
- Making employment decisions in the administration of, or in connection with, such a program or activity.

As a recipient of federal financial assistance, AAWDC must take reasonable steps to ensure that communications with individuals with disabilities are as effective as communications with others. This means that, upon request and at no cost to the individual, AAWDC is required to provide appropriate auxiliary aids and services to qualified individuals with disabilities.

What To Do If You Believe You Have Experienced Discrimination

If you think that you have been subjected to discrimination under a WIOA Title I financially assisted program or activity, you may file a complaint within 180 days from the date of the alleged violation with either:

Milena Kornyl

or

Director, Civil Rights Center (CRC)

Director/Equal Opportunity Officer

U.S. Department of Labor

613 Global Way

200 Constitution Avenue, NW, Room N-4123

Linthicum Heights, MD 21091

Washington, DC 20210

410-424-3240

mkornyl@aawdc.org

or electronically as directed on the CRC Web

site at www.dol.gov/crc

If you file your complaint with AAWDC, you must wait either until AAWDC issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing the Civil Rights Center (see address above).

If AAWDC does not give you a written Notice of Final Action within 90 days of the day on which you filed your complaint, you may file a complaint with CRC before receiving that Notice. However, you must file your CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which you filed your complaint with AAWDC).

If AAWDC does give you a written Notice of Final Action on your complaint, but you are dissatisfied with the decision or resolution, you may file a complaint with CRC. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action.

How AAWDC Handles All Other Complaints

AAWDC strives to provide high-quality services to all clients and customers of the Anne Arundel workforce development system. If you have questions or concerns about the services that you have received through AAWDC or the Anne Arundel County Career Centers, you may file a complaint within 60 days of the incident or occurrence with:

Jason Papanikolas

Policy and Compliance Analyst

613 Global Way

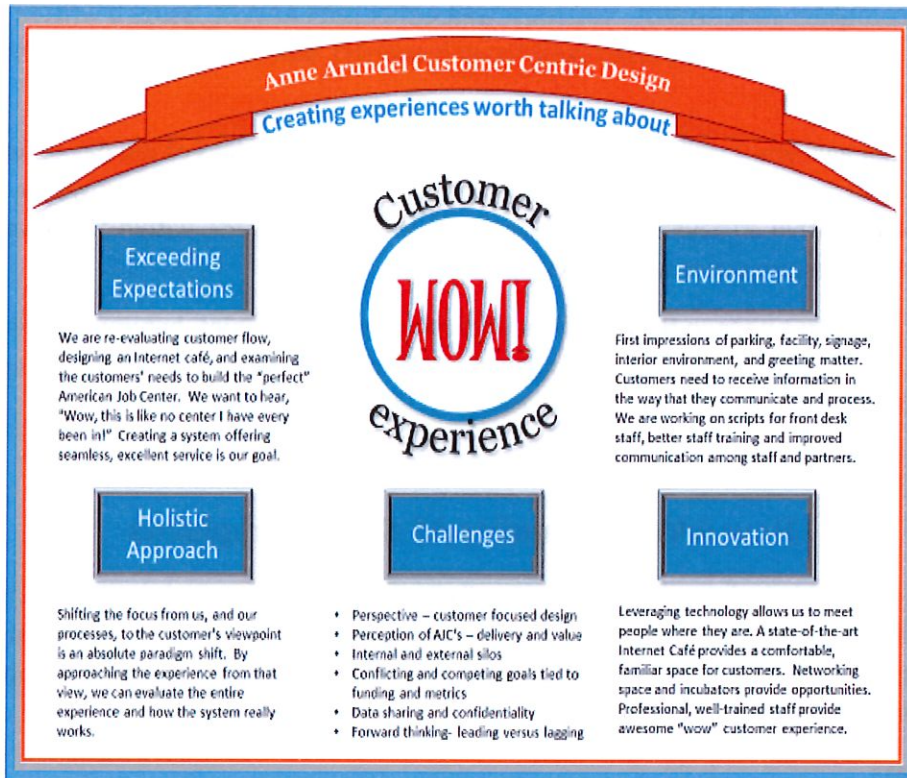
Linthicum Heights, MD 21090

410-424-3240

jpapanikolas@aawdc.org

You will receive a response within 30 days of submitting your complaint.

Attachment 4 – Anne Arundel Customer Centric Design



Attachment 5 – “Quality Assurance Guidelines” Policy

TO: All AAWDC staff and subgrantees
All administrative and fiscal entities operating workforce development grants under the auspices of the Anne Arundel County Local Workforce Development Board

FROM: Kirkland Murray
Executive Director
Anne Arundel County Local Workforce Development Board

SUBJECT: Quality Assurance and Monitoring

PURPOSE: Sets forth requirements for oversight and monitoring of all entities in the Anne Arundel Workforce Investment Area receiving workforce development funding, including WIOA. This policy will govern oversight and monitoring of administrative and fiscal entities of workforce development grants, all subgrantees of said grants and certain vendors of those grants.

ACTIONS: Grant and fiscal administrators will ensure that all employees are aware of and receive copies of this policy. Administrators shall ensure that staff follow the guideline set forth in this policy.

EXPIRATION: N/A

QUESTIONS: Jason W. Papanikolas, MBA
Policy and Compliance Analyst, AAWDC
410-424-3250
jpapanikolas@aawdc.org

CANCELLATIONS

This policy supersedes and replaces any local conventions in effect by any AAWDC initiative or administrative entity.

General Information

Monitoring can serve many purposes. Although it is most commonly used as a compliance exercise to ensure that organizations are operating within the boundaries of Federal and grant requirements, the Anne Arundel County Local Workforce Development Board (Local Board) believes that monitoring should be a multi-faceted management activity. Viewed through this lens, monitoring becomes an activity that links planning, program design, implementation, technical assistance, and evaluation as well as financial requirement standards.

The Local Board is responsible for monitoring the delivery of workforce development programs for businesses and participants throughout the Anne Arundel County Workforce Development Area (Local Area). In addition, the Anne Arundel Workforce Development Corporation (AAWDC) operates under Article 3, Title 14 of the Anne Arundel County Charter as the fiscal and administrative entity of workforce development funds in Anne Arundel County, including programs outside the purview of the Local Board's oversight. As such, AAWDC provides staff support to the Board in the accomplishment of its functions.

This policy covers the monitoring of the following:

- The Workforce Innovation and Opportunity Act (WIOA)
- Workforce development activities operated in the Anne Arundel County Career Center system
- Other programs or initiatives subject to Local Board oversight, such as National Dislocated Worker grants
- Other programs or initiatives operated by AAWDC, not subject to Local Board oversight

Monitoring Policy

The Local Board, AAWDC, and subgrantees shall participate in monitoring activities as required by law, regulation, or contract. It is the goal of the Board and AAWDC management that all programs receive a level of monitoring comparable to the program's size, complexity, and overall risk. Compliance staff shall utilize the following methods to monitor:

- *Risk Assessment* – The use of risk assessments allows compliance staff to narrow and concentrate the scope of oversight. Risk assessment is used to quantify the scope and overall risk of an individual program to the workforce development system. Several risk factors, including stability in leadership and personnel, size of the program relative to the system, history of complaints and findings, level of grantee oversight, funding amount, and length of grant are used to define a program as High, Medium, or Low Risk. The level of risk defines the methodology of monitoring used, the frequency of monitoring, and any special considerations added to contracts or grant agreements.
- *Desk Review* – This is a basic level of monitoring that typically consists of performance reporting, training and eligibility documentation review, financial invoice review, and monitoring of on-going concerns. Desk reviews are often incorporated into policies and procedures as an internal control. As such, desk reviews are not a holistic approach to monitoring, but rather look at specific parts of the whole that have the greatest risk factors. Low Risk programs may only ever receive desk reviews.

- *On-site Monitoring* – This is a secondary level of monitoring that allows compliance staff to verify certain items contained in a contract or identified during desk review. On-site monitoring will often consist of an intensive review of participant and/or financial records, observation of worksites, training environments, etc. When possible, compliance staff will interview or survey participants and program staff to assess quality and continuity of services. All Medium Risk programs should expect to be reviewed at least once per grant period. In addition, all subgrantees will receive an on-site monitoring at least once per contract period.
- *Prior Approval and Pre-approval* – These intensive monitoring levels are reserved for high risk programs and subgrantees. Where desk reviews and on-site monitoring are reviews of events and actions that have already occurred, prior approval/pre-approval requires the express permission of compliance staff before an action may occur. For example, a subgrantee with a history of disallowed supportive service costs may be required to obtain permission from a designated staff member at AAWDC before money may be spent on a supportive service such as bus passes. Given the high level of staff burden, a program or subgrantee is expected to take proactive measures to reduce risk to an acceptable level. Subgrantees receiving a high-risk rating shall not receive multi-year contracts.

Local Board Role in Monitoring

Board oversight shall include:

- An analysis of local labor market conditions to identify the workforce needs of area employers.
- Customer engagement to assure workforce development activities are meeting current local needs as well as planning for future needs.
- Identifying and evaluating proven and promising practices for meeting the needs of clients and customers.
- Ensure that local workforce development services and activities are consistent with local needs and are meeting or exceeding established performance outcomes.

To that end, the Board shall implement a program of qualitative assessment. The program shall include the elements described in the Governor’s Workforce Development Board Policy Issuance 2017-02 as follows:

1. The Board shall establish and maintain policies and procedures to guide local program management. The policies and procedures shall be consistent with grant requirements, including federal and state law, regulations, and policies, the Anne Arundel County Local Plan, and any specific grantor oversight requirements and plans.
2. The Anne Arundel County Local Plan shall be reviewed on a regular basis as proscribed in WIOA and state policy.
3. Performance data shall be reviewed by the Board at its regular meetings. Such data shall consist of: participants served, occupations being trained for, expenditures to budget, and other area-wide metrics as determined by the Board.

AAWDC Role in Monitoring

As the Fiscal and Administrative Agent for workforce development activities in Anne Arundel County, AAWDC works closely with the Local Board to monitor the financial and programmatic health of the various workforce development programs under its purview. AAWDC management has designated the

Office of Research, Performance and Compliance (RPC Office) as the primary oversight agent responsible for monitoring. As such, compliance staff shall have responsibility for conducting monitoring, developing appropriate reporting, and implementing corrective action to resolve any findings or concerns. Where a program is overseen by the Local Board, the RPC Office shall report to the Local Board (through the Governance Committee). If a program is not overseen by the Local Board, the RPC Office shall report to the AAWDC Executive Team.

Sampling

Where appropriate, compliance staff will utilize sampling techniques to ensure that fiscal and programmatic requirements are being met. Generally, a 10% sample of participants or records shall be randomly selected. Compliance staff shall monitor a minimum of five records if a 10% sample returns fewer than five records. AAWDC accepts a 10% error rate using this sampling method (an error rate of 10% is statistically relevant). If deficiencies or problems are identified that exceed the error rate, then the sample size should be increased until the error rate is lower than 10% or all records have been reviewed.

Monitoring Activities

Grant requirements create an overlapping jigsaw of performance, compliance, and programmatic monitoring concerns. Therefore, the Local Board and AAWDC consider monitoring to be a holistic activity; problems in one area often have impacts in other areas. Therefore, the RPC Office shall structure monitoring activities in such a way as to minimize staff burden and maximize impact. The RPC Office will conduct one or more of the following activities:

Risk Assessment

Compliance staff shall conduct a risk assessment each fiscal year for all programs and subgrantees. Staff will utilize the Pre-Award Risk Assessment Tool. This tool will assist compliance staff in identifying risk factors that may affect programmatic, regulatory, or fiscal outcomes for the program or subgrantee. To assess risk, compliance staff must gather sufficient information to make an objective assessment of risk. Should a program or subgrantee disagree with the overall assessment, the affected program/subgrantee may meet with the RPC Office to try and reach an agreement. The purpose of the meeting shall be to provide additional information that materially affects the assessment. Since it is incumbent upon AAWDC as the Fiscal and Administrative Agent to determine and manage risk, risk assessment decisions are not subject to appeal.

Performance Monitoring

Performance monitoring evaluates a program or subgrantee's degree of success in achieving measurable performance outcomes. A performance review shall be conducted quarterly and shall consist of an analysis of program outcomes as they relate to the established metrics of the grantor. The Board and AAWDC management reserve the right to add additional metrics as such metrics relate to the accomplishment of organizational metrics. Compliance staff may verify a sample of files based upon the performance metrics submitted in this quarterly report. Discrepancies will be corrected when identified. Should such discrepancies be statistically relevant, compliance staff shall report the finding to the relevant program/subgrantee manager and undertake a review as described in the Sampling section above.

Likewise, AAWDC accepts a 10% variance in performance metrics without penalty. Metrics with a variance greater than 10% shall require a corrective action plan within 10 days of being notified that such a plan is required. Corrective action plans are submitted to the relevant oversight body (Local Board or AAWDC Executive Team) for review and approval. Programs or subgrantees on a performance corrective action plan shall be monitored monthly to ensure compliance with the plan and to ensure that the program/subgrantee remains on track to meet performance metrics by the end of the performance period (usually defined as one fiscal year).

Program Start-up

Compliance staff shall conduct a program start-up meeting to familiarize subgrantee and program staff on specific contract/grant provisions and the relevant local policies and procedures, and reporting requirements. This is also an opportunity to discuss potential areas of underperformance and put contingency plans into place. In general, compliance staff shall discuss the following policies at a program start-up meeting:

- Eligibility Policy
- Training Policy (if necessary)
- Supportive Services Policy (if necessary)
- Case Management Policy (Case Management Service Map, Customer Flow, Case Management Expectations)
- Performance Metrics and Requirements

For new programs and subgrantees, a program start-up meeting shall be scheduled at the beginning of the first quarter of the grant/contract and shall be discussed in a group setting. For existing programs/subgrantees, a program start-up meeting shall be conducted as a one-on-one training with a compliance staff member. A program start-up meeting may also be required for an existing program or subgrantee for the following:

- Significant staff turnover (defined as 50% turnover of program staff or the replacement of key management staff during a Fiscal year or contract period)
- Significant changes to grant or contract (defined as changes to performance outcomes or new performance metrics)
- Statistically relevant monitoring findings during the previous Fiscal year or contract period

Compliance Monitoring

The purpose of compliance monitoring is to ensure that program/subgrantee activities comply with applicable Federal, state, and local laws, regulations, administrative requirements, and policies upon which the release of funds is conditioned. Compliance monitoring is often conducted through on-site monitoring or desk reviews. During a compliance monitoring, the program or subgrantee is reviewed for adherence to contract/grant work statements, general provisions, and assurances.

Records review is an essential component of compliance monitoring. Such a review ensures that appropriate documentation is being processed and recorded, that services paid for have been provided. During a records review the following items are reviewed:

- Instruments/activities used in assessment
- Services and training provided through co-enrolled programs
- Participant attendance
- Credentials earned/IEP goal achieved
- Periods of participation/Reasons for program exit
- Training progress
- Placement/follow-up service provision
- Services received and dates
- Information support for training
- Accuracy of test scoring/reporting
- Participant contacts/career counseling
- Eligibility (separate review)
- Equal Opportunity (separate review)
- Supportive services/Need-related payments (separate review)

Fiscal Monitoring

The purpose of fiscal monitoring is to ensure sound fiscal management occurs and contractual/grant requirements are met. The nature of such reviews means that fiscal monitoring shall only apply to subgrantees. Programs operated directly by AAWDC shall receive fiscal monitoring from the grantor. AAWDC will also participate in a single audit conducted according to the requirements of the Uniform Guidance (2 USC 200). Fiscal monitoring ensures financial accountability and the proper use of program funds. It consists of a systematic periodic review and evaluation of financial operations of the subgrantee.

Invoice reviews are conducted according to the terms in subgrant agreement. Generally, such a review will be conducted by the program responsible for administering the subgrant agreement. Documentation is required with invoices and documentation verification is performed for approval. Where there is a discrepancy between the invoice and back-up documentation, the program staff must work with the subgrantee to resolve the discrepancy before the invoice can be approved and paid. Resolution of discrepancies should occur within 10 days of invoice receipt.

Subgrantees shall be reviewed on-site annually. Compliance staff should select at least three invoices from one quarter to review. A desk review shall be conducted prior to the on-site review to gather information about the following areas:

- Proof of workers compensation, general liability, and fidelity bond policies (as may be required)
- Invoices and backup documentation for reasonableness and accuracy
- Financial, internal control and personnel policies and procedures
- Planned vs. actual budget and specific line item expenditures
- Cost allocations and prorrations to ensure expenditures are allowable and properly allocated to the appropriate grants and cost categories
- Single audit report (if appropriate)

- Ability to produce accurate financial records
- Federal and state tax payments
- Payroll policies and procedures
- Property management policies and procedures (if applicable)

For cost reimbursement contracts, source documentation is reviewed on-site and compared to invoices selected at random by the Fiscal Office. Adequate books must be maintained on contract expenditures. Shared costs charged to subgrant agreements should have a written and documented cost allocation plan which must be reasonably accurate. Disbursement journal entries and expenditure records must correspond to the planned allocation.

Work-and-Learn Monitoring

For work-and-learn training (either on-the-job training (OJT), internship, or subsidized employment), the employer/entity providing the training opportunity must be monitored to ensure performance of entity in relation to the training plan, wages, and regulatory compliance. This review is performed on-site with both entity and the participant and through desk review. Entities who fail to adequately perform or comply with the requirements of law, regulation, or agreement will be barred from participating in a work-and-learn training opportunity for a period of not less than three Fiscal Years. Each worksite should be monitored on-site annually by a member of business-facing staff. The purpose of the on-site review is to ensure that the worksite is generally safe and that certain contract provisions can be met.

Each work-and-learn training participant receives a desk review due to the nature of the training and high cost of training generally associated with these types of training. Desk reviews consist of a review of time and attendance records as well as payroll records to invoice. Where there is a discrepancy between the invoice and this back-up documentation, the program staff must work with the entity to resolve the discrepancy before the invoice can be approved and paid. Resolution of discrepancies should occur within 10 days of invoice receipt.

WIOA Program Internal Monitoring

Due to the unique nature of the program as a formula grant and for its impact on the Career Center system, the Adult/Dislocated Worker and Youth programs shall be subject to a rigorous internal review bi-annually. This monitoring should be performed in conjunction with the Department of Labor, Licensing, and Regulation (DLLR)'s annual monitoring program. The purpose of the internal monitoring is to analyze management procedures and the effectiveness of practices which control the delivery of services.

The following functions are analyzed and monitored:

- Local Board membership and operations
- Adequacy of procurement and contracting files in documenting adherence to procurement policies
- Adequacy of existing written procedures and their consistent use in program management
- Collection of information on program operations and the use of that information by program management (including the Local Board)
- Personnel and Equal Opportunity policies and procedures which prohibit discriminatory practices, and promote the objective selection and promotion and fair treatment of job applicants and employees

- Standard grievance policies and procedures and a sample of cases to ensure that procedures are being followed
- Data verification, specifically the adequacy and consistency of documentation on reported outcomes, and clear procedures regarding responsibility for collection of verification documentation
- Adherence to provisions set forth by DLLR
- Career Center system policies, coordination, and implementation

Monitoring Documentation

Written monitoring reports are structured to assist programs and subgrantees in reaching their goals by providing feedback regarding performance and compliance issues and to document the monitoring activities of the Local Board and AAWDC. Written reports will be developed after all on-site monitorings and when desk reviews uncover statistically relevant findings. Written reports constitute formal notification of monitoring reviews and findings. At its discretion, the RPC Office may utilize informal communication methods (i.e. e-mails, telephone calls, etc.) to resolve less serious findings or to provide advice and technical assistance prior to a problem becoming a finding. The RPC Office will also provide on-site technical assistance upon request by a program or subgrantee.

Draft monitoring reports will be completed within ten days of an on-site monitoring or discovery of a statistically relevant desk review finding. Draft reports are routed to the Director of the RPC Office for review and comment. The report will be sent to the program or subgrantee within thirty days of the review. Programs and subgrantees have ten days to submit responses to the report (including any required corrective actions) upon receipt. Follow-up monitoring or desk review determine if adequate corrective action has occurred. Failure to adequately resolve findings may have adverse consequences, including sanctions as detailed above.

Monitoring Findings

Program deficiencies which negatively impact a program or subgrantee will be noted in the written report. Findings include:

- Areas of noncompliance with law, regulation, grant agreement or local policy and procedures
- Programmatic area which interfere with program operations
- Program success (i.e. effective coordination of services across multiple vendors)
- Potential problems which could negatively affect a program in the future (called Area of Concern)
- Follow-up information

Findings are generally structured as a statement of fact and should provide the information listed below:

- Background information
- Problem analysis
- Outline of what was reviewed to reveal problems
- Size of the problem, if appropriate
- Corrective action and time frame for corrections to occur

Sanction Procedure

Should the Local Board or AAWDC Executive Team deem that sanctions are reasonable, prudent, and necessary, the following process shall be used:

1. The monitor observes a deficiency or a complaint against a subgrantee is received. If a deficiency, a report and the required corrective action is sent to the subgrantee. If a complaint is received, the process below shall be used.
2. If a deficiency cannot be corrected within the specified time frame, additional time may be given to resolve the corrective action. Additional time is provided at the discretion of the RPC Office for reasons that are unforeseen and not under the control of the subgrantee (for example, Data Change Requests with the MWE Help Desk).
3. Sanctions are imposed with due consideration given to the willfulness, flagrancy, and extent of the deficiency.
4. If the subgrantee disagrees with the imposed sanction, it may appeal using the Local Area's grievance procedures in effect at the time of the occurrence.
5. The decision of the Local Board or AAWDC Executive Team (as modified by any appeal through the grievance procedure process) shall be considered final.

Sanctions

When the Local Board or AAWDC Executive Team determine that findings reveal significant potential or actual problems with a subgrantee, sanctions may be instituted. Sanctions may include, but are not limited to:

- Designation of higher level of risk status, which will result in increased monitoring or pre-approval requirements
- Disallowance of costs associated with the violation or deficiency and recapture of an expended funds associated with the violation
- Disapproval or adjustment of requests for program funds until the violation has been corrected
- Reallocation of unexpended or unobligated funds
- Contract reduction/de-obligation
- Contract termination

Serious Infractions

Certain allegations merit special attention due to the nature of the allegation and infraction. Should monitoring activities reveals allegations of fraud and abuse, misapplication of funds, and/or gross mismanagement, payments to the program or subgrantee shall be suspended immediately. The Local Board and/or AAWDC Executive Team must be notified immediately, who will engage the services of appropriate legal counsel to resolve the allegations.

Serious infractions include:

Fraud and abuse

Fraud and abuse is defined as alleged deliberate action which is in violation of statute, regulation, or grant agreement. Fraud and abuse includes, but is not limited to: indications of bribery, forgery, extortion, embezzlement, theft, kickbacks, intentional payment to a provider/vendor/subgrantee without expectation of receiving services, and payments to "ghost" participants.

Misapplication of funds

Misapplication of funds is defined as the use of funds, assets or property not authorized or provided for in the grant or contract. Misapplication of funds includes, but is not limited to: political patronage, use of participants for political activities, ineligible enrollees, conflicts of interest, not reporting income from Federal funds, violation and the use of funds for purposes other than those stated in grant or contract. To meet the threshold for misapplication of funds, the misapplication of funds must be knowing and willful.

Gross Mismanagement

Gross mismanagement is any action or situation arising out of management ineptitude or oversight which leads to major violation of contract provisions and/or which severely hampers accomplishment or program goals. Gross mismanagement includes, but is not limited to: inauditable records, unsupportable cost, highly inaccurate fiscal and/or program reports, payroll discrepancies, payroll deductions not paid to the Internal Revenue Service and lack of control procedures.

2016-2020 Local Plan Assurances

References

✓	1.	Consistent with WIOA Section 108(d), for the 2016-2020 Plan, the Local Board has held at least one public comment period of no less than 30 days to obtain input into the development of the Local Plan and to provide the opportunity for comment by representative of business, labor organizations, education, other key stakeholders, and the general public.	WIOA Sections 108(d); proposed 20 CFR 679.550(b)
✓	2.	The final Local Plan is available and accessible to the general public.	Proposed 20 CFR 679.550(b)(5)
✓	3.	The Local Board has established procedures to ensure public access (including people with disabilities) to board meetings and information regarding board activities, such as board membership and minutes.	WIOA Section 107(e); proposed 20 CFR 679.390 and 679.550
✓	4.	The Local Board makes publicly-available any local requirements for the Local Area, such as policies, including policies for the use of WIOA Title I funds.	Proposed 20 CFR 679.390
✓	5.	The Local Board has established a written policy or procedure that identifies circumstances that might present conflict of interest for any local workforce investment board or entity that they represent, and provides for the resolution of conflicts.	WIOA Section 107(h); proposed 20 CFR 679.410(a)-(c)
✓	6.	The Local Board has copies of memoranda of understanding between the Local Board and each American Job Center partner concerning the operation of the American Job Center delivery system in the Local Area, and has provided the State with the latest versions of its memoranda of understanding.	WIOA Section 121(c); proposed 20 CFR 678.500-510
✓	7.	The Local Board has written policy or procedures that ensure American Job Center operator agreements are reviewed and updated no less than once every three years.	WIOA Section 121(c)(v)
✓	8.	The Local Board has procurement policies and procedures for selecting One-Stop operators, awarding contracts under WIOA Title I Adult and Dislocated Worker funding provisions, and awarding contracts for Youth service provision under WIOA Title I in accordance with applicable state and local laws, rules, and regulations, provided no conflict exists with WIOA.	WIOA Sections 121(d) and 123; proposed 20 CFR 678.600-615 and 681.400
✓	9.	The Local Board has procedures for identifying and determining the eligibility of training providers and their programs to receive WIOA Title I individual training accounts.	WIOA Sections 107(d)(10), 122(b)(3), and 123; Proposed 20 CFR 679.370(l)-(m) and 680.410-430
✓	10.	The Local Board has written procedures for resolving grievances and complaints alleging violations of WIOA Title I regulations, grants, or other agreements under WIOA and written policies or procedures for assisting customers/clients who express interest in filing complaints at any point of service, including, at a minimum, a requirement that all partners can identify appropriate staff contacts and refer customers/clients to those contacts.	WIOA Section 181(c); proposed 20 CFR 683.600
✓	11.	The Local Board has established at least one comprehensive, full-service American Job Center and has a written process for the local Chief	WIOA Section 121(e)(2)(A); proposed 20 CFR 678.305;

		Elected Official and Local Board to determine that the center conforms to the definition therein.	
✓	12.	All partners in the local workforce and education system described in this plan ensure the physical, programmatic and communications accessibility of facilities, programs, services, technology and materials in the Local Area's American Job Centers for individuals with disabilities.	WIOA Section 188; 29 CFR parts 37.7-37.9; 20 CFR 652.8(j)
✓	13.	The Local Board ensures that outreach is provided to populations and sub-populations who can benefit from American Job Center services.	WIOA Section 188; 29 CFR 37.42
✓	14.	The Local Board implements universal access to programs and activities to individuals through reasonable recruitment targeting, outreach efforts, assessments, service delivery, partner development, and numeric goals.	WIOA Section 188; 29 CFR 37.42
✓	15.	The Local Board complies with the nondiscrimination provisions of Section 188, and assures that Methods of Administration were developed and implemented.	WIOA Section 188; 29 CFR 37.54(a)(1)
✓	16.	The Local Board collects and maintains data necessary to show compliance with nondiscrimination provisions of Section 188 of WIOA.	WIOA Section 185; 29 CFR 37.37
✓	17.	The Local Board complies with restrictions governing the use of federal funds for political activities, the use of the American Job Center environment for political activities, and the Local Board complies with the applicable certification and disclosure requirements	CFR Part 230 Appendix B; 48 CFR 31.205-22; RCW 42.52.180; TEGL 2-12; 29 CFR Part 93.100
✓	18.	The Local Board ensures that American Job Center staff, along with the Migrant and Seasonal Farmworker program partner agency, will continue to provide services to agricultural employers and MSFWs that are demand-driven and consistent with ESD's mission.	WIOA Section 167
✓	19.	The Local Board follows confidentiality requirements for wage and education records as required by the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended, WIOA, and applicable Departmental regulations.	WIOA Sections 116(i)(3) and 185(a)(4); 20 USC 1232g; proposed 20 CFR 677.175 and 20 CFR part 603
✓	20.	The Local Board has a written policy and procedures to competitively award grants and contracts for WIOA Title I activities (or applicable federal waiver), including a process to be used to procure training services made as exceptions to the Individual Training Account process.	WIOA Section 108(b)(16); proposed 20 CFR 679.560(a)(15); WIOA Title I Policy 5601; WIOA Section 134(c)(3)(G); proposed 20 CFR 680.300-310
✓	21.	The Local Board has accounting systems that follow current Generally Accepted Accounting Principles (GAAP) and written fiscal-controls and fund-accounting procedures and ensures such procedures are followed to insure proper disbursement and accounting of WIOA adult, dislocated worker, and youth program and the Wagner-Peyser Act funds.	WIOA Section 108(b)(15), WIOA Title I Policy 5230; WIOA Title I Policy 5250
✓	22.	The Local Board ensures compliance with the uniform administrative requirements under WIOA through annual, on-site monitoring of each local sub-recipient.	WIOA Section 184(a)(3); proposed 20 CFR 683.200, 683.300, and 683.400-410

✓	23.	The Local Board has a written debt collection policy and procedures that conforms with state and federal requirements and a process for maintaining a permanent record of all debt collection cases that supports the decisions made and documents the actions taken with respect to debt collection, restoration, or other debt resolution activities.	WIOA Section 184(c); 20 CFR Part 652; proposed 20 CFR 683.410(a), 683.420(a), 683.750
✓	24.	The Local Board has a written policy and procedures for ensuring management and inventory of all properties obtained using WIOA funds, including property purchased with JTPA or WIA funds and transferred to WIOA, and that comply with WIOA, and, in the cases of local government, Local Government Property Acquisition policies.	WIOA Section 184(a)(2)(A); proposed 20 CFR 683.200 and 683.220; OMB Uniform Administrative Guidance; Generally Accepted Accounting Procedures (GAAP)
✓	25.	The Local Board will not use funds received under WIOA to assist, promote, or deter union organizing.	WIOA Section 181(b)(7); proposed 20 CFR 680.850
✓	26.	The Local Board has a written policy and procedures that ensure adequate and correct determinations of eligibility for WIOA-funded basic career services and qualifications for enrollment of adults, dislocated workers, and youth in WIOA-funded individualized career services and training services, consistent with state policy on eligibility and priority of service.	Proposed 20 CFR Part 680 Subparts A and B; proposed 20 CFR Part 681 Subpart A
✓	27.	The Local Board has a written policy and procedures for awarding Individual Training Accounts to eligible adults, dislocated workers, and youth receiving WIOA Title I training services, including dollar and/or duration limit(s), limits on the number of times an individual may modify an ITA, and how ITAs will be obligated and authorized.	WIOA Section 134(c)(3)(G); Proposed 20 CFR 680.300-320
✓	28.	The Local Board has a written policy and procedures that establish internal controls, documentation requirements, and leveraging and coordination of other community resources when providing supportive services and, as applicable, needs-related payments to eligible adult, dislocated workers, and youth enrolled in WIOA Title I programs.	WIOA Sections 129(c)(2)(G) and 134(d)(2); proposed 20 CFR 680.900-970; proposed 20 CFR 681.570
✓	29.	The Local Board has a written policy for priority of service at its American Job Centers and, as applicable, affiliate sites and for local workforce providers that ensures veterans and eligible spouses are identified at the point of entry, made aware of their entitlement to priority of service, and provided information on the array of employment, training and placement services and eligibility requirements for those programs or services.	Jobs for Veterans Act; Veterans' Benefits, Health Care, and Information Technology Act; 20 CFR 1010; TEGL 10-09; Veterans Program Letter 07-09
✓	30.	The Local Board has developed plans and strategies for maximizing coordination of services provided by the State employment service under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) and services provided in the Local Area through the American Job Center delivery system, to improve service delivery and avoid duplication of services.	
✓	31	The Local Board will provide reasonable accommodation to qualified individuals with disabilities unless providing the accommodation would cause undue hardship.	

