

**Workforce Innovation and Opportunity Act (WIOA)
MID-MARYLAND WORKFORCE
DEVELOPMENT BOARD**

Strategic Plan



PY2016-PY2020

Howard and Carroll Counties, Maryland

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WIOA Plan Acronym Glossary

Acronym	Definition
ABAWD	Able-Bodied Adults Without Dependents
ABE	Adult Basic Education
ACLS	Advanced Cardiac Life Support Certification
ADA	American Disabilities Act
AJC	American Job Center
APL	Johns Hopkins Applied Physics Laboratory
BERC	Business & Employment Resource Center
BLS	Basic Life Support (BLS) Certification
BMC	Baltimore Metropolitan Council
BRAC	Base Realignment and Closure
CAP	Cost Allocation Plan
CASAS	Comprehensive Adult Student Assessment Systems
CCC	Carroll Community College
CCNA	Cisco Certified Network Associate
CDL	Commercial Driver's License
CFR	Code of Federal Regulations
CISSP	Certified Information Systems Security Professional
CNA	Certified Nursing Assistant (CNA)
CRC	Civil Rights Center
CTE	Career and Technology Education
CTC	Career and Technology Centers
CWC	Columbia Workforce Center
DHR	Department of Human Resources
DISA	Defense Information Systems Agency
DLLR	Department of Labor Licensing and Regulation
DOL	Department of Labor
DORS	Division of Rehabilitation Services
DSS	Department of Social Services
DVOP	Disabled Veterans Outreach Program
EARN	Employment Advancement Right Now
EDA	Economic Development Authority
EO	Equal Opportunity

ESL	English Language Learner
ETPL	Eligible Training Provider List
FERPA	Federal Education Rights and Privacy Act
FMS	Financial Management System
GAAP	Generally Accepted Accounting Principles
GED	General Educational Diploma
GIAC	Global Information Assurance Certification
HCC	Howard Community College
HSP	Human Services Program
ISS	Individual Services Strategy
ITA	Individual Training Account
ITIL	Information Technology Infrastructure Library Certification
LAUS	Local Area Unemployment Statistics
LDSS	Local Department of Social Services
LMI	Labor Market Information
LVER	Local Veterans Employment Representative
LWIOA	Local Workforce Innovation and Opportunity Act
MEP	Manufacturing Extension Partnership
MOSH	Maryland Occupational Safety and Health
MSFW	Migrant Seasonal Farmworker Program
MWE	Maryland Workforce Exchange
MWIN	Maryland Workforce Investment Network
NAMI	National Alliance on Mental Illness
NEDP	National External Diploma Program
NEG	National Emergency Grant
NESAP	North East Social Action Program
NSA	National Security Agency
OJT	On the Job Training
OMB	Office of Management and Budget
ONET	Occupation Information Network
PII	Personally Identifiable Information
POS	Point of Service
RESEA	Re-Employment Services Assessment
RFP	Request for Proposal
ROW	Reemployment Opportunities Workshop

SBDC	Small Business Development Center
SCORE	Service Core of Retired Executives
SNAP	Supplemental Nutritional Assistance Program
STEM	Science, Technology, Engineering and Math
TAA	Trade Adjustment Assistance
TABE	Test of Adult Basic Education
TANF	Temporary Assistance for Needy Families
TCA	Temporary Cash Assistance
TEGL	Training and Employment Guidance Letters
UCX	Unemployment Compensation for Ex-Military members
UI	Unemployment Insurance
US	United States
USDOL	United States Department of Labor
WARN	Worker Adjustment and Retraining Notification
WDA	Workforce Development Area
WDB	Workforce Development Board
WIA	Workforce Investment Act
WIB	Workforce Investment Board
WIOA	Workforce Innovation and Opportunity Act
WP	Wagner-Peyser
WPR	Work Participation Rate

Introduction

The Mid Maryland Workforce Development Board collaborates with a wide variety of individuals, businesses, and organizations. The Workforce Development Board views the mission of the board as guiding a regionally recognized workforce development system that aligns with the economic and educational goals of the state of Maryland resulting in a qualified workforce available to business across Howard and Carroll Counties; our mission directly supports economic business growth.

The vision is for a Mid-Maryland where every person maximizes his or her career potential and businesses have access to the human capital they need to be successful.

The local plan is a living document and changes as workforce needs are identified. It is important to the Mid-Maryland Workforce Development Board that we respond to the needs of business and maintain and enhance the quality of life in the Area.

Section 1: Strategic Planning

This section should include a description of the strategic planning elements consisting of –

- (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.**

Mid-Maryland continues to enjoy a strong economy with consistently lower unemployment rates than most other areas of the state coupled with higher than average salaries. Howard and Carroll counties attract both national and international companies in a variety of industries. The Homeland Security industry growth and demand continues, especially with our proximity to Ft. Meade. Ft. Meade was one of the military installations positively impacted by the Base Realignment and Closure (BRAC). Ft. Meade is home to the National Security Agency (NSA), Defense Information Systems Agency (DISA), and Cyber Command along with many, many other tenant agencies. According to the Department of Commerce, Ft. Meade/NSA supports approximately 125,729 civilian jobs in Maryland earning an estimated \$9.2 billion in employee compensation. Ft. Meade is one mile from Howard County and one of the largest employers of Howard County residents. We offer workshops on the federal application process at the American Job Center (AJC) as well as at Ft. Meade. Staff will continue to work with defense contractors to identify the specific skills gaps and provide assistance with workforce recruitment and retention. Many positions are in the Science, Technology, Engineering and Math (STEM) fields. This directly correlates to growth occupations in Mid Maryland (Table I). Two of the largest employers in Mid-Maryland are Science Applications International Corporation (SAIC) and Johns Hopkins Applied Physics Laboratory (APL) and are both defense contractors. Fortunately, the large number of government agencies in the area produce a wide array of occupations.

According to DLLR statistics, there is projected growth between 2012 and 2022 in all healthcare occupations in Mid-Maryland. According to Howard and Carroll County Economic Development offices, five of the top employers in Mid-Maryland are in the healthcare industry; three are hospitals and two facilities are experienced providers of skilled nursing, retirement and residential care. Of the 6,006,401 residents in Maryland, it is estimated that 14.1% are over age 65. As the population continues to age, the need for healthcare workers is increasing. All types of health career training is supported within parameters of our funding and will be continued as long as the labor market supports it.

Warehousing and distribution is prevalent with numerous facilities in both counties. These facilities require skilled and unskilled employees. Many warehousing jobs require computer skills and there is also a need for Commercial Driver's License (CDL) drivers and forklift drivers. The Mid-Maryland Workforce Development Board (WDB) considers manufacturing and skilled trades as priority industries. The Board agreed that DLLR's projected growth industries and occupations and the industries identified in the Baltimore Metropolitan Council (BMC) Talent Development Pipeline Study (Table 2) should be considered priority industries and occupations in Mid-Maryland. (See Table I below).

Table I

Emerging and Growth Industries by County	
Carroll	
Growth Industries	Emerging Industries
Construction	Wholesale trade
Administrative and waste services	Arts, entertainment, and recreation
Educational services	
Health care and social assistance	
Accommodation and food service	
Other services, except public administration	
Howard	
Growth Industries	Emerging Industries
Management of companies and enterprises	Finance and insurance
	Health care and social assistance
	Accommodation and food services
	Other services, except public administration
	Gaming
	Green Energy
Mid-Maryland Workforce Area	
Growth Occupations	Emerging Occupations
Personal care and service	Legal
Computer and mathematical	Food preparation and service related
Business and financial operations	Arts, design, entertainment, sports, and media
Sales and related	Installation, maintenance, and repair
Architecture and engineering	Transportation and material moving
	Gaming
	Green Energy

(Source: DLLR State Plan)

Table II

Key Findings of the Baltimore Talent Development Pipeline Study - There are 39 occupations in the six sectors that are mid-skilled occupations where workers can progress into a position earning a living wage.

Healthcare	Construction	IT / Cybersecurity	Transportation & Logistics	Manufacturing	Business Services
<ol style="list-style-type: none"> 1. Medical Assistants 2. Medical Records and Health Information Technicians 3. Pharmacy Technicians 4. Surgical Technologists 5. Radiologic Technologists and Technicians 6. Medical and Clinical Laboratory Technicians 7. Licensed Practical and Licensed Vocational Nurses 8. Emergency Medical Technicians and Paramedics 9. Registered Nurses 10. Respiratory Therapists 11. Dental Hygienists 	<ol style="list-style-type: none"> 1. Electricians 2. Plumbers, Pipefitters, and Steamfitters 3. Carpenters 4. Operating Engineers and Other Construction Equipment Operators 5. Highway Maintenance Workers 6. Brickmasons and Blockmasons 7. Glaziers 8. Elevator Installers and Repairer 9. Heating, Air Conditioning, and Refrigeration Mechanics and Installers 	<ol style="list-style-type: none"> 1. Computer Support Specialists* 2. Computer Systems Analysts* 3. Network and Computer Systems Administrators 4. Information Security Analysts, Web Developers, and Computer Network Architects 	<ol style="list-style-type: none"> 1. Industrial Truck and Tractor Operators 2. Heavy and Tractor-Trailer Truck Drivers 3. Cargo and Freight Agents 4. Dispatchers 5. Bus and Truck Mechanics and Diesel Engine Specialists 	<p>Although the BMC did not indicate manufacturing in their report, Maryland has identified manufacturing as an industry that is growing and offers mid-skilled occupations where workers can progress into a position earning a living wage.</p>	<ol style="list-style-type: none"> 1. Tax Preparers 2. Human Resources Assistants 3. Hazardous Materials Removal Workers 4. Environmental Science and Protection Technicians, Including Health 5. Civil Engineering Technicians* 6. Electrical and Electronics Engineering Technicians* 7. Mechanical Engineering Technicians 8. Other Engineering Technicians 9. Architectural and Civil Drafters 10. Mechanical Drafters*

*Note: Also a top manufacturing occupation

(Source: Baltimore Talent Development Pipeline Study)

The Workforce Development Board would like for the Construction industry to be expanded to include Skilled trades and for the Business Services industry to include Administrative services.

Table III		
Job Area Distribution		
The table below shows the distribution of job openings advertised online in Maryland by workforce development regions on July 10, 2016 (Jobs De-duplication Level 2).		
Rank	Area Name	Job Openings
1	Baltimore City Workforce Region, Maryland	23,613
2	Montgomery County Workforce Region, Maryland	22,505
3	Mid-Maryland Workforce Region, Maryland	13,911
4	Baltimore County Workforce Region, Maryland	13,673
5	Anne Arundel Workforce Region, Maryland	13,036
6	Prince George's County Workforce Region, Maryland	12,828
7	Frederick County Workforce Region, Maryland	5,622
8	Southern Maryland Workforce Region, Maryland	5,594
9	Susquehanna Workforce Region, Maryland	5,435
10	Western Maryland Workforce Region, Maryland	4,046
11	Upper Shore Workforce Region, Maryland	2,953
12	Lower Shore Workforce Region, Maryland	2,809
<i>Job Source: Online advertised jobs data, MWE</i>		

(B) 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

Table IV			
Advertised Job Skills			
The table below shows the top 10 advertised detailed job skills found in job openings advertised online in Mid-Maryland Workforce Region, Maryland on July 10, 2016 (Jobs De-duplication Level 1).			
Over half of the top 10 advertised job skills in Mid-Maryland that are listed in the Maryland Workforce Exchange (Table IV) identify a need for “soft/essential skills.” Other top skills needed are in the Information Technology and Business Services industries.			
Rank	Advertised Detailed Job Skill	Advertised Skill Group	Job Opening Match Count
1	Customer service	Customer Service Skills	3,163
2	Problem solving	Basic Skills	1,327
3	Interpersonal skills	Interpersonal Skills	965
4	System design	Information Systems Manager Skills	610
5	Mentoring	Interpersonal Skills	602
6	Customer Service Skills	Customer Service Skills	575
7	Flexibility	Interpersonal Skills	568
8	Software design	Software Engineer Skills	554
9	Business development	Business Development Skills	474
10	Making decisions	Basic Skills	473
<i>Job Source: Online advertised jobs data, MWE</i>			

Table V			
Advertised Technical Needs of Business			
The table below shows the top 10 advertised technical needs found in job openings advertised online in Mid-Maryland Workforce Region, Maryland on July 10, 2016 (Jobs De-duplication Level 1).			
Information technology software and Security clearances are the most often requested tools and technology needs listed in the Maryland Workforce Exchange for Mid-Maryland job postings.			
Rank	Advertised Technical Needs	Technology Group and Business Needs	Job Opening Match Count
1	Polygraph (required for job)	Handling Classified Information	2,971
2	Linux	Operating System Software	2,363
3	UNIX	Operating System Software	1,365
4	JavaScript	Web Platform Development Software	939
5	PowerPoint	Presentation Software	471
6	Git	File Versioning Software	407
7	jQuery	Web Platform Development Software	375
8	Scripting languages	Web Platform Development Software	364
9	Solaris	Operating System Software	339
10	Requirements analysis software	Requirements Analysis and System Architecture Software	276
<i>Job Source: Online advertised jobs data, MWE</i>			

Table VI		
Advertised Job Certifications		
<p>The table below shows the top 10 advertised job certifications found in job openings advertised online in Mid-Maryland Workforce Region, Maryland on July 10, 2016 (Jobs De-duplication Level 1).</p>		
<p>The most sought after certifications are in the Transportation, Healthcare and Information Technology industries</p>		
Rank	Advertised Certification Group	Job Opening Match Count
1	Commercial Driver’s License (CDL)	593
2	Certification in Cardiopulmonary Resuscitation (CPR)	524
3	Cisco Certified Network Associate (CCNA)	289
4	Certified Information Systems Security Professional (CISSP)	286
5	Global Information Assurance Certification (GIAC)	197
6	Advanced Cardiac Life Support Certification (ACLS)	156
7	Certified Nursing Assistant (CNA)	122
8	Information Technology Infrastructure Library Certification (ITIL)	107
9	Basic Life Support (BLS) Certification	105
10	Security+ Certification	89
<p><i>Job Source: Online advertised jobs data, MWE</i></p>		

Table VII			
Education Requirements on Advertised Jobs			
<p>The table below shows the minimum required education level on job openings advertised online in Mid-Maryland Workforce Region, Maryland on July 10, 2016 (Jobs De-duplication Level 2).</p> <p>Over 59% of job openings in Mid-Maryland require a degree or advanced training beyond a high school diploma. It is important that targeted individuals with significant barriers receive advanced training in order to be qualified and competitive for these jobs.</p>			
Rank	Minimum Education Level	Job Openings	Percent
1	Bachelor's Degree	1,573	50.22%
2	High School Diploma or Equivalent	836	26.69%
3	No Minimum Education Requirement	461	14.72%
4	Associate's Degree	156	4.98%
5	Master's Degree	69	2.20%
6	Doctorate Degree	12	0.38%
7	2 Years of College or a Technical or Vocational School	11	0.35%
8	Vocational School Certificate	9	0.29%
9	1 Year of College or a Technical or Vocational School	2	0.06%
10	3 Years of College or a Technical or Vocational School	2	0.06%
11	Specialized Degree (e.g. MD, DDS)	1	0.03%
Job Source: Online advertised jobs data, MWE			

Table VIII			
Work Experience Requirements on Advertised Jobs			
<p>The table below shows the minimum required work experience on job openings advertised online in Mid-Maryland Workforce Region, Maryland on July 10, 2016 (Jobs De-duplication Level 2).</p> <p>79% of advertised job openings in Mid-Maryland require 1 year or more work experience. This presents a challenge to newly trained job seekers; therefore, Mid-Maryland will promote use of On-the-Job training, transitional jobs and internships and other work and learn opportunities.</p>			
Rank	Minimum Experience	Job Openings	Percent
1	Entry Level	363	18.58%
2	Less than 1 Year	51	2.61%
3	1 Year to 2 Years	548	28.05%
4	2 Years to 5 Years	533	27.28%
5	5 Years to 10 Years	312	15.97%
6	More than 10 Years	147	7.52%
Job Source: Online advertised jobs data, MWE			

Table IX		
Employers by Number of Job Openings		
The table below shows the employers with the highest number of job openings advertised online in Mid-Maryland Workforce Region, Maryland on July 10, 2016 (Jobs De-duplication Level 2).		
Mid-Maryland’s emerging and growth industries are reflected in Table IX; defense contractors, healthcare and Information Technology currently offer the most job openings.		
Rank	Employer Name	Job Openings
1	Booz Allen Hamilton Inc.	528
2	Northrop Grumman	427
3	JHU Applied Physics Laboratory	244
4	KEYW Corporation	214
5	Booz Allen Hamilton INC.	211
6	Leidos, Inc.	196
7	Johns Hopkins Medicine	165
8	LifeBridge Health	163
9	BAE Systems	161
10	Carroll Hospital Center	157
Job Source: Online advertised jobs data, MWE		

(C) 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

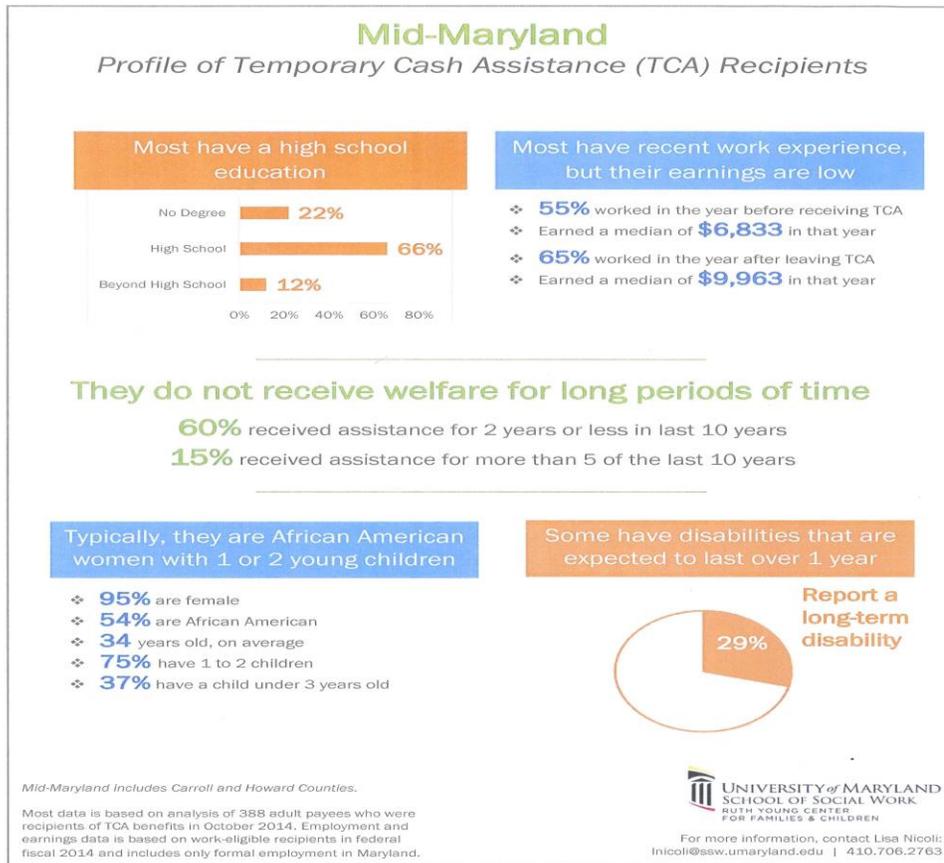
Table X		
Labor Force, Employment and Unemployment Distribution		
The table below shows the workforce development regions with the highest preliminary unemployment rate in Maryland for May 2016. These figures are not seasonally adjusted.		
Mid-Maryland has the lowest unemployment rate in the State of Maryland. In this area, our businesses face challenges finding the highly qualified employees they need to fill their open positions. In addition, with a very low unemployment rate it is equally difficult to fill low skilled jobs.		
Rank	Area Name	Unemployment Rate
1	Baltimore City Workforce Region, Maryland	6.1%
2	Lower Shore Workforce Region, Maryland	5.9%
3	Western Maryland Workforce Region, Maryland	5.0%
4	Baltimore County Workforce Region, Maryland	4.4%
5	Prince George's County Workforce Region, Maryland	4.3%
6	Upper Shore Workforce Region, Maryland	4.2%
7	Susquehanna Workforce Region, Maryland	4.1%
8	Southern Maryland Workforce Region, Maryland	3.9%
9	Frederick County Workforce Region, Maryland	3.6%
10	Anne Arundel Workforce Region, Maryland	3.6%
11	Montgomery County Workforce Region, Maryland	3.3%
12	Mid-Maryland Workforce Region, Maryland	3.2%
Source: Local Area Unemployment Statistics (LAUS) Unit and Bureau of Labor Statistics		

Table XI		
Candidate Area Distribution		
<p>The table below shows the workforce development regions in Maryland where the highest number of potential candidates in the workforce system were looking for work on July 10, 2016. There were 7,311 candidates who indicated that they were willing to work anywhere in the state.</p>		
<p>The table below shows that Mid-Maryland has the 6th largest number of potential candidates.</p>		
Rank	Area Name	Potential Candidates
1	Baltimore County WIA, Maryland	16,842
2	Prince George's County WIA, Maryland	16,455
3	Anne Arundel WIA, Maryland	15,590
4	Baltimore City WIA, Maryland	15,275
5	Montgomery County WIA, Maryland	15,112
6	Mid-Maryland WIA, Maryland	15,030
7	Susquehanna WIA, Maryland	12,028
8	Southern Maryland WIA, Maryland	11,472
9	Frederick County WIA, Maryland	11,045
10	Upper Shore WIA, Maryland	10,550
<p>Candidate Source: Individuals with active resumes in the workforce system, MWE</p>		

Table XII			
Education Level of Available Candidates			
The table below shows the education levels of potential candidates in Mid-Maryland Workforce Region, Maryland on July 10, 2016.			
Rank	Minimum Education Level	Potential Candidates	Percent
1	Bachelor’s Degree	3,626	24.14%
2	High School Diploma or Equivalent	3,532	23.51%
3	1 to 3 Years at College or a Technical or Vocational School	2,588	17.23%
4	Master’s Degree	1,854	12.34%
5	Vocational School Certificate	1,483	9.87%
6	Associates Degree	1,264	8.42%
7	Doctorate Degree	313	2.08%
8	Less than High School	218	1.45%
9	Specialized Degree (e.g. MD, DDS)	143	0.95%
Candidate Source: Individuals with active resumes in the workforce system, MWE			

Table XIII			
Work Experience Levels of Available Candidates			
<p>The table below shows the experience levels of potential candidates in Mid-Maryland Workforce Region, Maryland on July 10, 2016.</p>			
<p>Available candidates offer a wealth of experience. Over 82% have 1 year or more of work experience with 79% of job openings requiring 1 year or more work experience (Table VIII). The challenge Mid-Maryland faces is that the work experience of candidates is not always in the same industry as that needed in advertised open positions.</p>			
Rank	Minimum Experience	Potential Candidates	Percent
1	More than 10 Years	10,833	72.08%
2	5 Years to 10 Years	1,669	11.10%
3	Less than 1 year	1,150	7.65%
4	2 Years to 5 Years	997	6.63%
5	1 Year to 2 Years	381	2.54%
<p>Candidate Source: Individuals with active resumes in the workforce system, MWE</p>			

Temporary Cash Assistance (TCA) recipients in Mid-Maryland have the profile below:



Howard County has over 8400 employers, with approximately 172,000 people in the labor force and a median income of \$102,000. Carroll County’s employer base is over 4,400 with over 90,404 in the labor force and an approximate median income of \$95,825. Over half of Mid-Maryland’s workforce commutes outside of the area. Significant numbers of commuters from across the state of Maryland as well as out-of-state workers come into Carroll and Howard counties for employment. Education is highly valued in the Area. The 2015 Maryland Report Card indicates that both counties have a high school graduation rate of approximately 95%. In addition, the report indicates that over 98% of Howard’s graduates and 85% of Carroll’s graduates have documented a decision to pursue post-secondary studies.

A growing number of Mid-Maryland’s population faces challenges due to their lower English language proficiency. Mid-Maryland’s increase in diverse cultural demographics is a contributing factor and further validates the importance of ESL programs and the role they will play in helping our diverse population successfully integrate into the workforce. According to the Adult Education providers in Mid-Maryland, in FY16, 67.3% of all Adult Education students were involved with ESL. According to the Maryland Department of Planning, from the Population Division, U.S. Census Bureau, June 23, 2016, reports showed that from July 1, 2014- July 1, 2015, Mid-Maryland increased in population by 15%. 62% of this

change was directly related to the growth of the Asian population. Anecdotally, we have learned that there is an increase in the Spanish speaking population, particularly from Central America.

Mid-Maryland recognizes the importance of increasing employment and work opportunities for people with disabilities and works closely with its partners at DORS to help individuals find meaningful employment. According to the 2014-2015 American Community Survey 5-Year Estimates, approximately 5-7% of Mid-Maryland's population are working age individuals with disabilities. During the 2016 Fiscal Year, Mid-Maryland's Division of Rehabilitation Services reported serving 2207 individuals, of which the majority reported having cognitive, mental, psychosocial and physical impairments. 76% of these individuals had a high school diploma, including special education and 23% with some post-secondary education.

Mid-Maryland's Workforce Centers provide comprehensive employment services to assist ex-offenders and those that who are close to release. Data provided by the Maryland Workforce Exchange System indicates that of the 3536 participants served in Mid-Maryland since July 1, 2016, 6% reported being ex-offenders. Through representation on the Re-entry Coordinating Council bi-monthly meetings, we are actively involved in strategizing ways to assist ex-offenders who are on the road to self-sufficiency. We work closely with the Department of Correction and have a dedicated staff member who provides employment related workshops to educate inmates on labor market information and other resources offered at the American Job Centers.

In Mid-Maryland, public transportation has contributed to the challenges some employer's face in finding and retaining employees. With the growing population and increased congestion, the area continues to look for ways to improve upon the transportation infrastructure needed to help businesses meet their workforce needs and to assist jobseekers with maintaining employment. Although we attempt to find innovative solutions to the transportation challenges, many entry-level workers, who do not own a vehicle, have difficulty getting to and from work using public transportation.

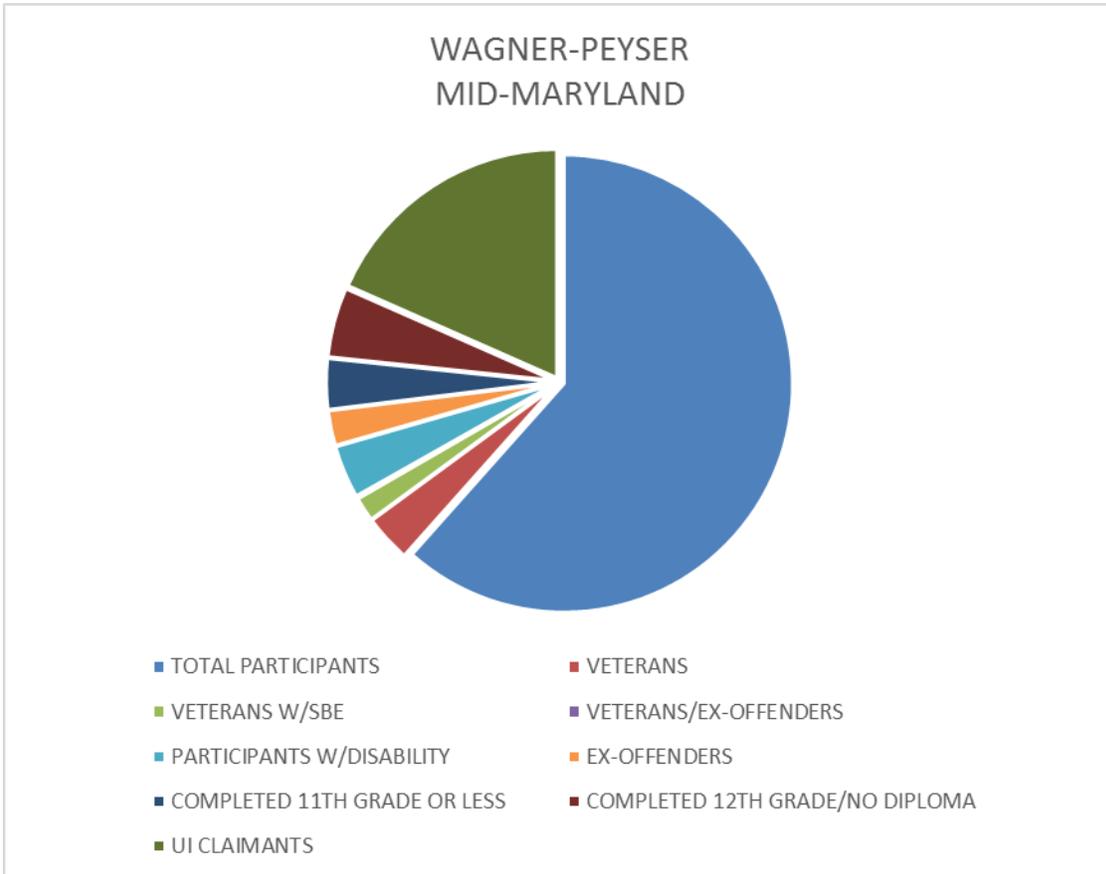
The charts on the following two pages reflect the demographics served in Mid-Maryland based on data obtained through the Maryland Workforce Exchange System.

Enrolled Individuals

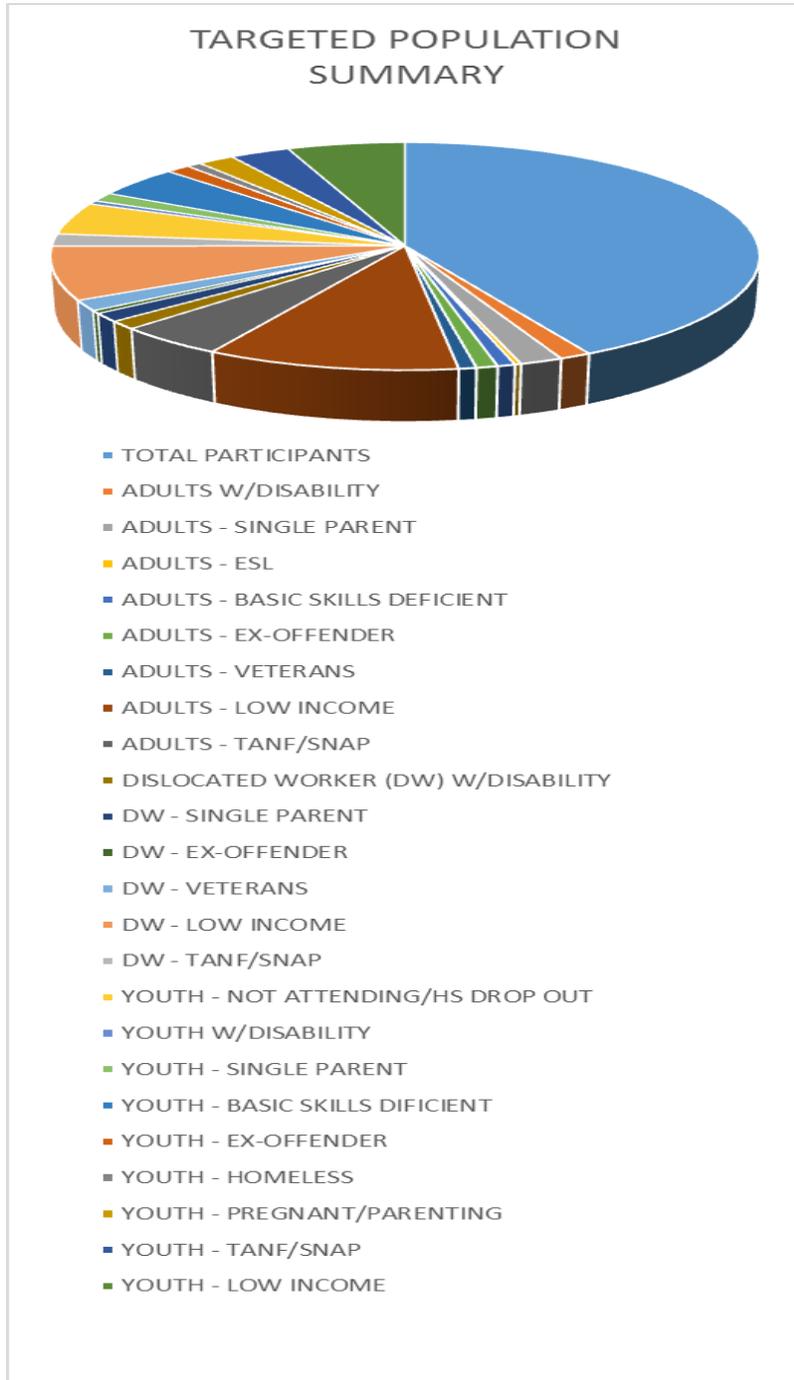
Participation Date: 7/1/16-2/13/2017

Report Type: Wagner-Peyser

Region: Mid-Maryland



WIOA Targeted Population Summary
Mid-Maryland
7/1/15-6/30/16



(D) 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.

Mid-Maryland has the capacity to provide a range of workforce development activities. Our workforce development system strives to align workforce activities with business needs. Mid-Maryland has one of the top performing K-14 systems in the state. Our K-12 education system has a very high graduation rate. The Career and Technology Centers (CTC) provide education and training that reflects the local market demand and prepares students for advanced education/employment. Students may earn college credit and job-driven industry certifications through the CTCs. WIOA Title 1 staff serves on the advisory boards for the CTCs. The community colleges, particularly the Continuing Education divisions, create programs that effectively respond to the skills required by area business. Pre-apprenticeship and registered apprenticeship opportunities are available through Mid-Maryland community colleges in some of the skilled trades.

There are numerous quality-training providers and programs in Mid-Maryland. However, we are limited by the number of programs in our area on the ETPL. Fortunately, our central location allows for participants to access training outside of Mid-Maryland.

High caliber business services teams assist business with overcoming the challenges of recruiting, retaining, and developing talent. The Business Services Team has a clear understanding of industry skill needs, identifies appropriate strategies for assisting employers, and coordinates business services activities across partner programs. The Team presents a unified voice for its communications with business.

Strengths:

- Co-location with WIOA-mandated core partners and strong collaboration with other partners
- Effective working relationships with local and other partners throughout the state of Maryland
- Workshop facilitators are subject matter experts
- Educated and credentialed workforce development staff committed to the mission
- Staff is knowledgeable of current labor market trends and projections, and skills required in the labor market; staff has extensive knowledge of community resources
- Integrated and robust business services teams
- Strong customer service focus; high quality and specialized career services

Weaknesses:

- Need to further increase outreach and recruitment efforts to businesses, and job seekers including targeted populations under WIOA and improve marketing of services available
- Need to establish a statewide common intake process with partners that are more customer-friendly and streamlined to alleviate “agency time” for clients
- Limited public transportation options
- Limitations of ETPL

(E) 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 Workforce Development Board views the mission of the board as guiding a regionally recognized workforce development system that aligns with the economic and educational goals of the state of Maryland resulting in a qualified workforce available to business across Howard and Carroll Counties; our mission directly supports economic business growth.

The vision is for a Mid-Maryland where every person maximizes his or her career potential and businesses have access to the human capital they need to be successful.

One goal is to strengthen strategic partnerships with business and education. We believe the most effective way to prepare the workforce is to respond to the current and future needs of regional businesses. We will continue to respond to business demand for both hard and soft skills. We consistently hear from businesses that many candidates while technically suited, lack the soft skills crucial to employee success. This is of particular concern with young people and those individuals with barriers. We will address these vital skills gaps through assessment, counseling, role modeling, and training. We will provide training opportunities to narrow the hard skills gap that have been identified. For example, defense industry sector jobs often require certifications. In response to this demand, we provide training leading to those credentials, certifications and ultimately employment.

Another goal is to meet performance while putting people first. Each participant will be assessed to identify workforce strengths and weaknesses and how to prepare them to meet the labor market needs. An individual employment plan will be developed to assist them in successfully obtaining and retaining employment. Our goal is to start people on a career pathway leading to a self-sufficient wage. We plan to offer youth work and learn opportunities to provide access to hard and soft skills.

WIOA Performance Metrics	Agreed Upon Goals for PY2016 and PY2017
Adult Measures	
<i>Employment Rate 2nd Quarter after exit</i>	72%
<i>Employment Rate 4th Quarter after exit</i>	70%
<i>Median Earnings 2nd Quarter after exit</i>	\$5,000
<i>Credential Attainment within 4 Quarters after exit</i>	60%
Dislocated Worker Measures	
<i>Employment Rate 2nd Quarter after exit</i>	80%
<i>Employment Rate 4th Quarter after exit</i>	75%
<i>Median Earnings 2nd Quarter after exit</i>	\$8,500
<i>Credential Attainment within 4 Quarters after exit</i>	66%
Youth Measures	

<i>Employment or Placement Rate 2nd Quarter after exit</i>	60%
<i>Employment or Placement Rate 4th Quarter after exit</i>	60%
<i>Credential Attainment within 4 Quarters after exit</i>	60%
Wagner-Peyser Measures	
<i>Employment Rate 2nd Quarter after exit</i>	55%
<i>Employment Rate 4th Quarter after exit</i>	55%
<i>Median Earnings 2nd Quarter after exit</i>	\$6,400

We want to increase outreach to targeted populations such as homeless individuals, disconnected youth, individuals with disabilities, ex-offenders and others receiving priority for WIOA Adult funds. We currently have relationships with many partner organizations servicing these individuals but would like to reach out to even more. We plan to accomplish this by expanding outreach to other service providers of these targeted populations. We will provide veterans and their family members workforce support to make the transition from military to civilian employment as successful as possible. It is important to the Mid Maryland WDB that its residents maintain or enhance their quality of life and achieve the American dream.

(F) Taking into account analyses described in subparagraphs (A) through (D), 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 described in subparagraph (E).

We have held and will continue to hold local partner meetings to ensure alignment of the system and to make the best use of resources available. The goal for all of us is an integrated system that is responsive to local and regional workforce needs. Collaboration will result in enhanced customer service.

A customer-centered approach is the cornerstone of our service delivery. This will be achieved by:

- Increasing opportunities for cross training of staff fostering timely and responsive services without duplication
- Sharing information to ensure alignment with the goals identified by the board
- Supporting the state’s goal for a common intake process
- Establishing point of contacts for each partner to enhance the customer referral process

Section 2: Alignment of the local Workforce Development System

This section should include –

(A) 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.).

Mid-Maryland enjoys a robust workforce development system with established partnerships. We work with numerous partners including those identified in the state plan. The system includes the following partners but is not limited to:

- Title I WIOA (WA, WD, Youth)
- DLLR (Wagner Peyser, Veterans, Trade, U.I and Migrant and Seasonal Farm Workers)
- Division of Rehabilitation Services (DORS)
- Adult Education & Literacy and Carl Perkins
- TANF
- Job Corps

Many of the programs are co-located. For example, in Howard County WIOA Title 1, Wagner Peyser and DORS are co-located in a comprehensive AJC. Adult Ed has provided classes in the workforce center and provides youth services in response to the youth RFP. There is a very strong partnership between the Howard County Detention Center, Adult Ed and WIOA Title 1. We meet regularly to develop strategies for the re-integration of ex-offenders and both Adult Ed and WIOA Title 1 staff provide services at the Detention Center. Additionally, a WIOA staff person, acting as a point of contact, briefs soon-to-be-released individuals on available services. Many of these individuals are TANF recipients once they are released. Veteran representatives (DVOP's) also meet with veterans, with significant barriers in the detention center to address their needs and to describe services specific for veterans. In Carroll County, Title 1 WIOA, Wagner Peyser, Adult Education and Family & Children Services are co-located in a comprehensive American Job Center. We are developing a common assessment policy with the Adult Ed providers.

All partners plan to communicate regularly to ensure services are provided seamlessly, collaboratively and without duplication. The ultimate goal is a common intake and/or referral process; discussions have begun on developing this. Core partners are also meeting to address further alignment, integration and service strategies. Additionally, all partners identified in the state plan are either on the Workforce Development Board or participate on a committee. For example, the Core partners have set up quarterly combined staff trainings, which have already begun. We will share information about services and resources available for participants and businesses. These trainings will allow staff to learn about appropriate referrals for each agency and how to access services. In addition, we plan to invite other partners serving barrier populations to ensure customers have access to all community resources not just those within the AJC.

Programs of study will be developed based on the following: employer input, labor market information, priority industries, industries identified in the Baltimore Metropolitan Council's Talent Development Pipeline Study, which offers career pathways leading to middle wage jobs. We will also use emerging, growth and priority industries identified by LMI and the WDB.

(B) 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);

We will use varied strategies to expand access for eligible individuals particularly individuals with barriers to employment. At present, we outreach to a variety of community organizations and agencies, in addition to the core partners including: housing, health departments, Children's Boards, and homeless organizations. We intend to expand our outreach while using Maryland's strategy to "place people before performance. We will reach out to non-traditional locations, where individuals with barriers may be such as halfway houses, the Day Resource Center and, the Multiservice Center and others. We have expanded our social media presence and expect to continue to expand it.

In order to facilitate co-enrollment and improve access to activities, we are considering an idea to have one dedicated point of contact for each core partner (WIOA, WP, DORS, DSS, Adult Education) to streamline customer service, referrals and response. We are also looking to create a checklist of steps at intake in an effort to streamline the referral process. We are very interested in a common intake process. Our goal is to have everyone know their "NEXT STEP" along their career path. The over-reaching idea is to have a clear and sequential understanding of "what is next for your career" in the industry. We will use the data from the Baltimore Metropolitan Council Opportunity Collaborative research to identify career pathways that align with the established need as well as the other LMI identified by the board. When funding training we work toward assisting the individual with obtaining a certification or credential that is portable, stackable and in demand. We review labor market information and will only support training where data indicates it will lead to employment. When an individual is embarking on a new career, we support training that allows for upward mobility and expands their opportunities. We would like to increase registered apprenticeship opportunities to create career ladders leading to successful employment for our customers.

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

We meet and work regularly with the entities identified in A. The Workforce Development Board has been discussing the formulation of the plan, held a one-day retreat, and subsequent meeting focused solely on plan development where each core partner was represented. Committees worked on components of the Plan and individual partner meetings were held to further plan development. Board members, including the WDB Chair, participated in the Maryland Convening. Each board member received a copy of the draft plan during the 30-day comment period.

(D) A 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
- To support a local workforce development system that meets the needs of businesses in the Local Area
- To better coordinate workforce development programs and economic development
- To strengthen linkages between the American Job Center delivery system and Unemployment Insurance programs;

The following strategies and services are options that may be used:

- Work with Economic Development to form ad-hoc committees from in-demand industry sectors to gather their input and needs for follow-up action
- Increase social media outreach (i.e. LinkedIn groups)
- Invite industry representatives to speak with job seekers
- Monitor WARN notices
- Increase outreach through business and industry trade associations, real estate brokers (leasing space to incoming or expanding businesses)
- Increase speaking engagements in the business community
- Establish an outreach subcommittee to continuously seek ways to engage target businesses
- Continue to participate in Economic Development Meetings to support businesses seeking employees and people seeking employment opportunities
- Establish a regular interval and method for communication of updates
 - Two-way communication between business and the partners opens opportunities that will assist in meeting business needs early in the process. Proactive communication affords the opportunity for active engagement of businesses
- Participate in joint visits to businesses in the community
 - Routinely visiting organizations in the community helps to establish consistent relationships that place our resources at the forefront of their thoughts. Performing regular outreach helps ensure the relationship outlasts turnover, turbulent or challenging times. The outreach creates a partnership between the partners and the benefiting business
- Participate in Business Appreciation Week
 - This approach helps reinforce the WDB/business relationship and continues to educate businesses on opportunities available to them
- Strengthen linkage between U.I and AJC
 - Locally, AJC staff assists with helping job seekers file U.I. claims and setting up appeal requests. We plan to request staff training from U.I. for the AJC. In Mid-Maryland, there is a specific point of contact from the U.I. system to help with RESEA and ROW as well as more complex U.I. issues. Having a direct point of contact will strengthen the linkage between programs. We implemented RESEA and ROW locally, which has direct ties to U.I.
- Communicating strategies and services
 - We will share information among the partners relevant to each other's programs. For example, if we discover a business's employees are in need of adult education services we will inform our Adult Ed. partners.

(E) 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.

We have already started implementing initiatives designed to meet the needs of businesses. For example, in Mid-Maryland we have successfully used the OJT program for many years. The Board recently approved an incumbent employee training policy and we plan to support other business training initiatives. We participated in the Mobile Health IT, MEP and Cyber. We will continue to support the EARN program.

We will use existing industry-organizations to glean information and participation in sector partnerships.

For example, through information gathered from the Manufacturing Consortium, Carroll Community College is seeking funding to develop a manufacturing foundations training to address the skills gap identified by this group and identify potential career pathways. We have partnered with other workforce areas to respond to the regional need for cyber security with both EARN and NEG grants. We support and work with our community colleges in creating training programs consistent with career pathways and registered apprenticeship initiatives. We will expose our participants to more registered apprenticeship opportunities to assist with filling the demand in the Area. We plan to expand industry-sector partnerships, increase outreach to businesses, and business organizations in support of these initiatives.

(F) 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;

Workforce Development activities are currently being coordinated. So much so, that in Carroll County the WIOA Title I partner is part of the Economic Development agency and in Howard County, the Economic Development Authority is a close partner (see D above). Both Economic Development agencies are represented on the WDB. We will continue to promote entrepreneurial skills and microenterprise services using various means to include:

A. Support Client Self-Employment Options

Link workforce services with the programs of the Maryland Center for Entrepreneurship and the Small Business Development Center (SBDC), the Service Core of Retired Executives (SCORE), and at the community colleges.

B. Provide a regular schedule of self-employment resources in the community

Maintain an up to date listing of the counseling, training and mentoring resources and how to sign up for such services available to support WDB clients seeking to start their own businesses.

C. Include the SBDC at self-employment workshops at the AJC

Include entrepreneurship as a component of reemployment workshops at the AJC to broaden the range of options for clients.

(G) 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;

We are very well connected to our community partners who provide support services. We continuously share customers and make referrals to each other. Staff will continue to actively participate on many boards and committees to provide an increased knowledge of available supportive services. As an example of partnership with the Local Management Board, is they are partnering with us on our annual youth job and resource fair. This is a direct result of our relationship. Staff also serves on the local Management Board and the Disconnected Youth subcommittee. We participated in planning sessions with the local Management Board and have been included in a grant application.

Another example is that we may provide training for a recipient of DSS services but the DSS will provide the supports such as childcare and transportation to allow the individual to attend training. We work closely with the Transportation offices to further leverage and coordinate supportive services.

(H) A description of how the Local Board intends 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;

Mid-Maryland believes in a demand-driven workforce system based on the needs of our businesses. We access our board members to provide a voice in the delivery of workforce development activities. We regularly gather information from our industry-specific recruitments. We target industries based on both formal and informal LMI and priority industries identified in Section 1. When meeting with businesses, whether individually or in groups we specifically discuss and identify training requirements. We work with our partners including the community colleges and economic development offices and their related advisory groups to obtain this valuable information. Our job seeker customers are required to research skills needed in the local area and share that information with their counselors. This is another avenue we use to identify types of training required by local and regional business. As an added bonus, the President of one of the Chambers of Commerce is on the local board. Another strategy we intend to use is industry sector partnerships to identify skill requirements and to develop work and learn opportunities such as: registered apprenticeships, on-the-job-training, internships, work experience, incumbent employee training and any other work and learn opportunity in demand by our businesses community.

(I) 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.

The Mid-Maryland Workforce Development Board is committed to serving businesses.

We will:

- Communicate with industry groups to inform and update about career pathways and EARN Maryland initiatives and use their feedback to inform in-demand training.
- Communicate with the region's industry groups to cultivate industry-led partnerships as well as access board members and their connections. *Ongoing*
- Ensure available training matches the area's workforce needs. *Ongoing*
- Stay apprised of and advocate for K-16 career pathways programs and beyond particularly advocating for business and industry connections for work experience and internships. *Ongoing*
- Support job readiness training. *Ongoing*
- Support business and education activities including mock interviews with professionals and workforce staff. *Several times per year staff participates in mock interview sessions youth and as needed with adult job seekers; the WDB supports structured mock interview sessions*
- Sponsor Meet and Greets with industry representatives and invite school personnel. *We encourage participation with Chamber of Commerce and Economic Development meet and greets*
- Host Career Fairs to include industry professionals. *Ongoing*

We have several industry led partnerships in the area such as Tech Hire and the Manufacturing Consortium. Based on roundtable discussions between participating companies from the Manufacturing

Consortium and workforce staff, Mid-Maryland awarded its first incumbent employee training contract to a local manufacturer. The Manufacturing Consortium will continue to meet quarterly to discuss industry needs and workforce solutions. Through information gathered from the Tech Hire companies, we plan to offer essential workplace skills training to employees, new hires and potential applicants of these companies. The Tech Hire partnership of educators, businesses, community organizations, economic development and workforce staff will continue to meet to strategically attract more tech businesses and train local talent to succeed in high demand tech positions. Annual events such as TechStorm, which is an annual conference focused on cyber security and IT issues, will be offered in support of the industry partnerships. We working with partners and business to develop a strategic industry partnership in green energy to potentially submit a proposal for an EARN grant

Through the development of our regional plan, we expect to develop regional industry sector partnerships that should evolve over the next two years.

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

We have strong partnerships with many community-based organizations in our area. The workforce development system is supported by many of these organizations. Success in Style, a member of the WDB, provides interviewing and work attire free of charge for individuals with barriers to employment. Bridges to Housing Stability and the Human Services Program (HSP) provides housing for homeless or those at risk of being homeless. They refer clients to the AJC for workforce assistance and we refer clients to them. NESAP, a faith-based organization, provides services to low income individuals. We refer clients to them and they refer recipients of their services to us. We have offered workshops at some of our faith-based and community-based organizations.

Section 3 – American Job Center Delivery System

This Section should include a description of the American Job Center delivery system in the Local Area, including—

(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.

The Business and Employment Resource Center

Comprehensive Site

224 N. Center Street, Westminster, MD 21157

410.386.2820

The Columbia Workforce Center (CWC)

Comprehensive Site

7161 Columbia Gateway Drive, Ste. D

Columbia, MD 21046

410.290.2620

(B) Customer Flow System - Describe the customer flow process used in the Local Area. This description should include eligibility assessment, individualized training plans and case management.

Mid-Maryland uses a customer-centered approach. Our customer flow is designed to provide wrap around assistance to the job seeker from the point of entry to point of exit. Through various means of assessment, staff and partners determine the customer's level of job readiness and identify resources, which are applicable to the customer's needs and goals. In order to maximize services provided to the job seeker, Mid-Maryland has developed partnerships with both mandated partners and other resources that are coordinated to ensure uniformity and minimize any duplication of effort. Referrals are made to the appropriate partner(s). A common intake method is being discussed with the hope that the State, with its partners, will coordinate a technology-based tool that all partners could access.

Mid-Maryland's eligibility process includes an interview, evaluation and career planning assessment. The process is designed to acquaint the job seekers with the resources and services available. At this time, any need for other partner or community services is identified and the appropriate referrals are offered. Job seekers are encouraged to register using the MWE system. We are currently developing a strategy to streamline the eligibility intake process with partner programs. For those job seekers who are determined to meet Adult, Youth, or Dislocated Worker eligibility guidelines, required documents are collected and reviewed. The exception to this is the Veteran. Mid-Maryland follows the WIOA guidelines regarding services to Veterans.

Based on the initial assessment which determines the customer's level of job readiness and customer need, services may be provided such as: basic career services, individualized career services, referral to partner services, support services and follow up. In cases of referral, or if two or more agencies are working with a customer, then collaborative case management may be implemented to best meet the needs of the customer.

Basic career services may include the initial assessment of needs, assessment of skill levels and literacy, referral to partner services, information on training providers, labor market information, career counseling and assistance with applying for unemployment insurance benefits. Individualized career services may include comprehensive and specialized assessments, development of an Individual Employment Plan, case management, career planning, short-term prevocational training, education and training. Follow up services, including workplace counseling, will continue for a minimum of twelve (12) months after the customer exits the Adult, Dislocated Worker or Youth program.

(C) Describe how the Local Board will ensure meaningful access to all customers.

Mid-Maryland is committed to ensuring customers have meaningful physical and programmatic access to services including individuals with disabilities and those with limited English proficiency. When individuals come into the AJCs they are triaged to determine services that will be most meaningful for them. AJC staff is aware of all available access points for supportive services. We are lucky because DORS is co-located in an AJC and assisted with the design of the AJC to enhance services to customers, including those with disabilities. Adult Education is also co-located in an AJC and assists individuals with limited English proficiency and literacy skills. We have recently upgraded our assistive technology to meet customer needs. We are exploring the use of enhanced technology to serve individuals who cannot physically get to the Centers. Staff will go to other organizations to provide services such as: homeless shelters, halfway houses, detention facilities, the MultiService Center and others when it is difficult for customers to get to the workforce centers.

(D) 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.

We plan to competitively bid the OSO. Mid-Maryland will comply with WIOA laws and regulations.

(E) 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.

Mid-Maryland supports a demand-driven system based on labor market need. We assess the business needs of the region and share that information. We encourage training providers to place in demand training programs on the ETPL and encourage job seekers to use eligible providers of training that meet the regional demand. Mid-Maryland requests job seeker and business customer feedback regarding their experience with eligible providers of service. We formally and informally monitor providers of service. We evaluate if they are meeting our local employment needs. If we receive negative feedback about a provider then staff further investigates the concern. Staff may visit the provider to ensure that the appropriate services are being delivered. We share feedback with eligible providers so that they may effectively adjust services.

(F) 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;

We use technology to communicate with customers through various means such as email, phone, social media, websites and other technology. Free WIFI is available in many areas in Mid-Maryland which allows for ease of communication. We use social media and MWE to advertise events and provide information about our services. We have the technology available for staff and customers to have a video conversation and/or counseling session. We are exploring how to use text messaging to convey information and how to provide remote access to workshops. We have a large computer with a camera available so customers and clients may have "skype" conversations.

In an effort to provide the most-customer friendly service possible, job seekers are encouraged to use the MWE system from any location where there is Internet access, including their homes. If individuals do not have Internet access at home and cannot get to a physical AJC, they are told of other places where there is free public Internet access in the community.

Mid-Maryland staff provides services at various locations to increase outreach such as libraries, the hospital, community resource fairs and other places where individuals may have challenges accessing services. We use extensive electronic distribution lists to inform the community of services being delivered.

(G) 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;

Each center is periodically assessed for ADA compliance. We have upgraded assistive technology and workstations. Our local and state government as well as community colleges are compliant with the provisions of the ADA.

We provide staff training to support compliance and augment services to address the needs of individuals with disabilities. For example, NAMI, the local crisis center and local police department provided training on how to respond to customers with mental health needs. Many members of the staff attended Mental Health First Aid training and as a follow up, participated in De-Escalation training. Staff has also attended national EO training where some of this was addressed. Periodic training regarding how to best provide services for job seekers with disabilities will be offered to staff. As a system partner, DORS has agreed to provide staff training.

(H) 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 local board understands that sub-recipients may be subject to the above requirements.

(I) A description of the roles and Resource contributions of the American Job Center partners;

In Mid-Maryland, we are striving toward a comprehensive and integrated system that provides a no wrong door approach to service delivery. We will continue to work closely with our AJC partners toward achieving this goal. We expect this enhanced collaboration between the partners will lead to better service for business and job seeker customers. Resource sharing will be accomplished through a mutually agreed upon and WIOA compliant Resource Sharing Agreement. Updated roles of partners will be coordinated through the development of a Memorandum of Understanding at the local level. The goal the AJC is for customers to leave our AJCs feeling more empowered to meet their workforce development goals than when they entered the centers. The ultimate role of each partner is to assist customers in meeting employment and training goals that support quality of life.

The AJC partners work together to coordinate job seeker and training services, business services and labor market information. Our goal is to ensure that businesses have skilled workers and job seekers have access to employment and training resources. Available programs and services include but are not limited to:

WIOA Title I and Wagner Peyser

<ul style="list-style-type: none"> • Career Centers w/Internet, copying, faxing, etc. 	<ul style="list-style-type: none"> • Business Consultation
<ul style="list-style-type: none"> • Maryland Workforce Exchange (mwejobs.maryland.gov) 	<ul style="list-style-type: none"> • Labor Market Information
<ul style="list-style-type: none"> • Job Search Workshops and Seminars 	<ul style="list-style-type: none"> • Youth Services

<ul style="list-style-type: none"> • Career Assessment , Counseling and Planning 	<ul style="list-style-type: none"> • Training Information and Services
<ul style="list-style-type: none"> • Résumé and Interviewing Assistance 	<ul style="list-style-type: none"> • GED/ National External Diploma Program Information • English Language Learner Information • Adult Basic Education
<ul style="list-style-type: none"> • Veteran Services Program 	<ul style="list-style-type: none"> • Grants and Outplacement Assistance (Businesses)
<ul style="list-style-type: none"> • TRADE Act Program (TAA) 	<ul style="list-style-type: none"> • Tax Credit information
<ul style="list-style-type: none"> • Migrant Seasonal Farmworker Program (MSFW) 	<ul style="list-style-type: none"> • Unemployment Insurance (UI) Information

Maryland’s Veterans’ Program provides veterans’ activities authorized under Chapter 41 of Title 38, United States Code. Veterans receive preference in all services as outlined by the law. The LVER assumes functional supervisory responsibility for the Veterans’ Program as well as community outreach. The DVOP provides career-coaching and case management services to veterans with significant barriers to employment. Additional services include outreach, individual employment plans, and collaboration with and referral to other partner agencies for additional services as needed.

Division of Rehabilitation Services (DORS) offers programs and services that help people with significant disabilities become successfully employed. DORS also has programs tailored for high school students with disabilities who are making the transition from school to employment, higher education or vocational training. Available programs and services include:

<ul style="list-style-type: none"> ▪ Career decision making and counseling, to help find a career path that best suits interests and abilities
<ul style="list-style-type: none"> ▪ Rehabilitation technology services, to find solutions to help perform the job to the best of one’s ability
<ul style="list-style-type: none"> ▪ Employment and skills training
<ul style="list-style-type: none"> ▪ Job search and placement services
<ul style="list-style-type: none"> ▪ Job coaching and supported employment services

DORS also provides vocational and other training services, including personal and vocational adjustment training, and accommodations. Also provided are interpreter services, reader services, rehabilitation teaching services, orientation and mobility services for individuals who are blind. Job search and placement assistance, job retention services, supported employment and post-employment services are available to assist with regaining, maintaining or advancing in employment. As part of the community partnership, DORS is aware of and utilizes other partner services necessary to assure that job seekers with disabilities secure needed services. DORS is co-located at an AJC which provides ease of access and information flow.

Adult Education and Literacy Act offers classes for individuals who are interested in improving skills in reading, writing, and math or learning to speak and understand the English language. They may also prepare to earn a high school diploma through GED tests or the National External Diploma Program (NEDP).

Available programs and services include:

<ul style="list-style-type: none"> ▪ GED and NEDP Prep and Testing and English Language learning

<ul style="list-style-type: none"> ▪ Adult Basic Education
<ul style="list-style-type: none"> ▪ Assist adults to become literate and obtain knowledge and skills necessary for employment and self-sufficiency.
<ul style="list-style-type: none"> ▪ Assist adults who are parents to obtain educational skills necessary to become full partners in the educational development of their children.
<ul style="list-style-type: none"> ▪ Assist adults in the completion of a secondary school education.

The Carroll Community College, Howard Community College and Howard County Library System provide adult basic education and literacy training. Title I customers are referred to ABE and Literacy Works programs, GED and External Diploma programs, based on the customers’ needs. Carroll Community College is co-located in an AJC, facilitating ease of access and resource sharing. We have MOUs with these entities for providing services and sharing information.

Maryland’s Temporary Assistance to Needy Families (TANF) program, also called Temporary Cash Assistance (TCA) provides cash assistance to families with dependent children when available resources do not fully address the family’s needs and while preparing participants for independence through work. Families may also file an application for assistance with childcare costs.

(J) 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); and,

We will use ITAs to support the labor market demand in our WDA and in the Region. We will assess the client’s background, education, skills, abilities and goals to identify training that will prepare them for high demand and/or difficult to fill positions. The Mid-Maryland Board identified priority industries referenced in 1 (A). However, if a business has a particular need, there is a strong likelihood the training will result in a job, or it will allow the individual to start on a career path, we may provide training outside of the priority industries.

(K) A description of how the Local Board will provide priority of service that conforms to 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.

Priority for Adult Funds

Section 134(c)(3)(E) of WIOA establishes a priority requirement with respect to funds allocated to a local area for adult employment and training activities. Under this section, staff responsible for these funds must give **priority** to recipients of **public assistance, other low-income individuals, and individuals who are basic skills deficient** in the provision of individualized career services. Priority must be provided regardless of the level of funds.

Veterans and eligible spouses continue to receive priority of service for all DOL-funded job-training programs, which include WIOA programs. However, as described in TEGl 10-09, when programs are statutorily required to provide priority for a particular group of individuals, such as the WIOA priority described above, priority must be provided in the following order:

- i. First, to **veterans and eligible spouses** who are also included in the groups given statutory priority for WIOA adult formula funds. This means that veterans and eligible spouses who are

also **recipients of public assistance**, other **low-income individuals** or **individuals who are basic skills deficient** would receive first priority for services provided with WIOA adult formula funds.

- ii. Second, to non-covered person (that is individuals who are **not** veterans or eligible spouses) **who are included in the groups given priority** for WIOA adult formula funds. The targeted groups are:

Target Populations: Individuals with Barriers to Employment
• Displaced Homemakers
• Eligible migrant and seasonal farmworkers
• Ex-offenders
• Homeless individuals
• Individuals facing substantial cultural barriers
• Individuals with disabilities, including youth with disabilities
• Individuals within two years of exhausting lifetime eligibility under Part A of the Social Security Act
• Individuals who are English language learners
• Individuals who are unemployed, including the long-term unemployed
• Individuals who have low levels of literacy
• Individuals without a High School Diploma
• Low income individuals (including TANF and SNAP recipients) Long-term unemployed individuals
• Native Americans, Alaskan Natives, and Native Hawaiians
• Older individuals
• Single parents (including single pregnant women and non-custodial parents) Veterans
• Youth who are in or have aged out of the foster care system

Employed Adults who are low income (see below) will also be given priority in Mid-Maryland. According to the Baltimore Metropolitan Council’s Opportunity Collaborative Workforce Study, a family supporting wage is \$22.88/hour in the Baltimore Metropolitan area. Therefore, we choose to include employed adults meeting 150% of poverty guidelines as a priority. Customer notes will reflect eligibility for this priority.

- iii. Third, to **veterans** and **eligible spouses** who are **not included in WIOA’s priority groups**.

- iv. Last, to **non-covered person outside the groups given priority** under WIOA.

Employed adults must be “low income” individuals. The term “low income individual” means an individual who received an income, or is a member of a family that received a total family income, for the 6-month period prior to registration for the program that, in relation to family size, does not exceed 150% of the USDOL Lower Living Standard Income Level. Additionally, an individual receiving, or determined eligible to receive food stamps during the 6-month period prior to application; an individual who qualifies as homeless under the Stewart B. McKinney Homeless Assistance Act; or an individual with a disability whose own income meets the definition of low income, but who is a member of a family whose income does not meet the definition.

Basic skills deficient means, with respect to an individual— (A) who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or (B) who is a youth or adult, that the individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society.

VETERAN; RELATED DEFINITION. — VETERAN.—The term “veteran” has the meaning given the term in section 101 of title 38, United States Code. (B) RECENTLY SEPARATED VETERAN.—The term “recently separated veteran” means any veteran who applies for participation under this Act within 48 months after the discharge or release from active military, naval, or air service.

Note: When past income is an eligibility determinant for Federal employment or training programs, any amounts received as military pay or allowances by any person who served on active duty, and certain other specified benefits must be disregarded for the veteran and for other individuals for whom those amounts would normally be applied in making an eligibility determination. Military earnings are not to be included when calculating income for veterans or transitioning service members for this priority, in accordance with 38 U.S.C. 4213.

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

We have developed an incumbent worker training program with the guidance of our board. Mid-Maryland may use up to 20% of Adult and Dislocated Worker funds to provide incumbent worker training. It allows businesses to create additional job opportunities through job promotion, improved worker retention and layoff aversion by increasing the skill level of the existing workforce. These are employer-based training projects targeted for in-demand industries, and industry sectors identified in Section 1. Eligible business will be required to pay a percentage of the approved training cost.

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

Customer service is the foundation of all we do in Mid-Maryland. We consider everyone with whom we come in contact to be our customers, both internal and external to our system and use formal and informal mechanisms to track customer service. Our AJCs have an excellent reputation for customer service. Based on feedback received, staff training will be provided as needed and will continue to be incorporated as part of how we do business. Staff has participates in a variety of trainings. For example, customer engagement was recently offered as well as de-escalation training, diversity and respectful workplace training.

Section 4 – Title I – Adult, Youth and Dislocated Worker Functions

This Section should include –

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

The Mid-Maryland Workforce Centers are committed to a customer-centered design recognizing that our customers include businesses and job seekers. All WIOA services are available to Adults and Dislocated Workers either directly in the Area's AJC or through the vast network of community partners, public and private training institutions, vocational technical centers, community colleges, private proprietary schools, and four-year public and private educational institutions.

We support an integrated service delivery system for job seekers and business. Everyone may access career services and we encourage the use of the Centers through orientations, outreach, referrals, and events. We will continue to prepare an educated and skilled workforce that meets the needs of business. Our workforce system has the resources, services, and tools to assist individuals in obtaining and maintaining good jobs and improve employment prospects for success. All job seekers have access to job search tools and resources at the centers, such as, MWE and other internet based job search websites; linkages to community partners; access to local, regional, and national labor market information. In addition, we conduct and develop job search workshops facilitated by experts. These workshops are designed to assist targeted populations based on regional workforce needs.

We will continue to work closely with our customers to address and remove workforce barriers. This includes assessing and determining job readiness, identifying the need for other supportive services, assisting with resume development and advocating for the customer to be competitive in the labor market. For example, we provide employment services for the local shelter, refer customers who are in need of appropriate business attire to non-profit partners and work from satellite offices in low income areas.

We will assist job seekers to acquire industry-recognized credentials for in-demand jobs. This will be accomplished through staff assisted career services to include, but not limited to, comprehensive assessment, counseling, case management, funded training, work based training experiences including on the job training and registered apprenticeship opportunities.

The Business Service team will participate in sector partnership activities in the identified key industries. We will continue to engage business in discussions about their industries, training needs, skill gaps, and what they believe their future needs will be. The information gathered helps identify specific in-demand short-term training that results in certificates and credentials. This leads to a talent pipeline of individuals who possess the knowledge, skills and abilities that match the labor market demand.

Howard and Carroll counties both hold job fairs and recruitment fairs throughout the year to assist business with their hiring needs and to help job seekers reach their employment goals. These recruitments are industry focused and demand driven based on local and regional employer needs. Mid-Maryland will continue to offer these job fairs and specialized recruitments as a service to Area business.

(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).

We provide rapid response activities in response to the WARN Notice and other layoff situations to dislocated workers by conducting information sessions at the location that is closing or reducing staff. We team with DLLR staff and other partners to provide comprehensive information including information on Center services, job leads, and unemployment insurance. The dislocated workers are

encouraged to access the full array of services available and visit the American Job Center. They are provided information about how to access MWE and other job search tools electronically. We work with partners to diminish the time between the rapid response and the individual obtaining employment. For example, workers who were affected by a closure faced significant transportation barriers and could not easily get to the AJC. In order to maximize re-employment opportunities, we held a successful targeted recruitment for affected workers at the company's location prior to closing. We plan to use this model for future Rapid Responses.

(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;

Mid-Maryland uses a customer-centered design in the delivery of all services. As previously mentioned, we pride ourselves on customer service and youth is no exception to this. We treat each youth as an individual; therefore, we design a plan for each person. Many out of school youth are in need of their high school diploma. We partner with Adult Education to assist youth with GED preparation. In Mid-Maryland, a high school diploma is necessary for most jobs and is certainly a pre-requisite to start on a career path. We provide assessments for youth to assist them in identifying potential careers. Once a career has been identified, they may have the opportunity to attend occupational skills training. Aside from providing the 14 required elements through a contractor, staff or partner, we have the support of County Government in providing work and learn opportunities. Youth participants have the opportunity work as contingent employees of Howard County government and experience real-life work. For example, participants have worked in the Office of Human Rights, Transportation, Finance, Fleet, Purchasing, Office on Aging and many others. These offices have already hosted participants in work and learn opportunities and Finance has hired one youth and Recreation and Parks hired another.

In addition to our successful youth program, we are fortunate to have other successful programs in our area. One program we are particularly proud of is our Career Exploration Day program. We have partnered with the Howard County Public School System and the Howard County Department of Community Resources and Services, Office of Disability Services and DORS to host this event. 2017 will be our 10th Anniversary. The students shadow Howard County Government employees and private sector businesses for half the day to learn about the diverse opportunities available in local government and private sector business and experience a real-life work setting.

Students travel to their assigned work sites, which were chosen based on a student's area of vocational interest. The Career Exploration Day experience includes meeting with staff, learning about the qualifications and skills needed to perform various jobs, observing employees in the workplace and completing a work-related task. Typically, the County Executive, Maryland Secretary of Disabilities, and the Superintendent of Schools open the event.

We host youth in the workforce centers to practice mock interviews with local businesses. We partner with DORS to administer their summer youth program, which is another opportunity for youth with disabilities to obtain actual work experience.

A successful model in the Area is Project Search. This is a one-year transition program designed for young adults with intellectual and developmental disabilities who are either in their last year of high school or are recent graduates. Project SEARCH is an important transition program that helps youth with

special needs acquire competitive workplace skills and expand their future employment opportunities. Various county government departments have hosted these interns through the 2015-2016 school years in three, 10-week sessions. Support for these interns will continue with job placement assistance while preparations begin for the next class in the fall.

The school systems CTE offers a variety of programs that are designed to prepare students to be successful in the career field of their choosing. Career areas currently include: Arts, Media, and Communication; Business, Management and Finance; Construction and Development; Consumer Services, Hospitality, and Tourism; Health and Biosciences; Human Resource Services; Information Technology; Manufacturing, Engineering and Technology; Transportation Technologies; and Career Research and Development. Each field has an advisory committee to bring the most realistic up-to-date information to the students. This model has been very successful in assisting students with entering college or pursuing other work staff participates on advisory boards.

Another model is Job Corps. Job Corps is a free education and training program that helps young people learn a career, earn a high school diploma or GED, and find and keep a good job. For eligible young people at least 16 years of age that qualify as low income, Job Corps provides the all-around skills needed to succeed in a career and in life. Currently, Job Corps is a member of the WDB.

(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;

In Mid-Maryland, we will continue to work closely with the public schools for referrals to our youth program and they often refer families in need of workforce services too. We have relationships with the counselors at the various high schools who refer students who are dropping out of school and/or are potential AJC customers. We work very closely with our community college partners to refer students to each other and coordinate service. One of the community colleges is the provider of youth services for WIOA Title I youth, which makes the coordination very easy. We serve on the advisory board of the CTC, and our WDB community college and CTC partners are active on the board.

The WDB's youth committee is an avenue for partners to work toward coordination of education and workforce development activities. The counties in Mid-Maryland have several networking committees and boards that meet regularly to discuss and plan for the needs of the identified youth. Aside from the more traditional post-secondary activities, we are focusing on increasing youth awareness of the trades. The committees are comprised of WIOA core partners as well as the public schools, public libraries and non-profit and government service providers.

Additionally, we partner with Ft. George Meade to provide services to youth of military families. Ft. Meade youth participate in our summer job fairs and WIOA staff serves on youth committees on Ft. Meade. Open communication among partners allows for unduplicated service and enhanced coordination among partners.

(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;

Supportive services may be provided to those who are participating in programs and activities authorized

by WIOA and who are unable to obtain such supportive services through other programs providing such services. Customers are referred to the appropriate organizations providing the services before accessing WIOA funds for supportive services. The Mid-Maryland Area may provide supportive services, as WIOA funding allows, to an individual on an as-needed basis.

Public transportation has historically had its challenges in Mid-Maryland and affects job seekers' ability to obtain and retain employment. We have partnered with the transportation office to identify gaps in services that would typically affect our customers. Together, we have identified parts of the county where businesses have a need for employees but transportation becomes a barrier to staffing. Transportation is the primary support service Mid-Maryland provides, especially for youth. We serve on local boards that examine the workforce transportation challenges in our area and try to determine ways to mitigate those challenges.

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

We intend to provide the full array of workforce services to all eligible adults with priority given to targeted populations such as: veterans and eligible spouses, economically disadvantaged individuals including TANF recipients, individuals who are basic skills deficient or have limited English proficiency, individuals with disabilities, offenders, homeless and other in need populations. Services provided include workshops, one-one and group counseling, development of individualized employment plans, skills analysis, labor market information, occupational skills training, job preparation and job search assistance. We will continue to work with our partners in the community to provide the most comprehensive services and referrals.

Priority is given to the adult groups specified in the state plan. Through an initial assessment, we will identify if an individual qualifies for POS. Mid-Maryland may use funding to provide the full array of basic, individualized and follow-up services. This may include: outreach, staff services, counseling and guidance, assessment, support services, coursework, training, registered apprenticeships, transitional jobs, and other work and learn opportunities, incumbent worker training, the use of ITAs and/or classroom sized training, contracts and any other allowable workforce service that will benefit the job seeking customer and regional economy.

We will expand our outreach to these populations. Our ultimate goal is for these populations to reach self-sufficiency. Together with the job seekers we serve, we evaluate their short and long-term goals, and develop an individual employment plan that will map out a path to help them achieve their goals. As funding is available we provide training that allows for someone to begin employment above entry-level and be on a career path. Together with the job seeker, we will provide training that will lead to employment in the local and regional labor market. Meeting the needs of business is a priority for Mid-Maryland when assisting individuals with focusing on a career. We will focus on the industry sectors referenced in Section 1 of the Plan. Using a business-driven model we will develop career pathways with our partners when it most beneficial to both the business and job seeker customer.

(G) A description of how the Local Board will utilize Local Dislocated Worker Funding;

We intend to provide workforce services to all eligible dislocated workers. Services provided include workshops, one-one and group counseling, development of individualized employment plans, skills analysis, labor market information, occupational skills training, job preparation and job search assistance.

We will continue to work with our partners to develop the most comprehensive referrals and services.

Mid-Maryland may use funding to provide the full array of basic, individualized and follow up services. This may include: outreach, staff services, assessments, support services, coursework, training, registered apprenticeships, transitional jobs, other work and learn opportunities, incumbent worker training, the use of ITAs and/or classroom training, contracts and any other allowable workforce activity. Dislocated worker funding may be used to support business services. These services are not limited to but may include: job fairs and job matching, industry specific recruitments, industry sector partnerships, retention, incumbent worker and on the job training, assessment, roundtables, and any other allowable WIOA activity that allows us to further understand or respond to business needs to support the local economy. We will use dislocated worker funds to support rapid response activities in the area as funding allows.

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

Self-sufficiency for employed adults and employed dislocated workers will be defined as follows:

Employed Adults –self-sufficiency is defined as exceeding 175% of the USDOL Lower Living Standard Income Level (see specifics below)

Employed adults must be “low income” individuals. The term “low income individual” means an individual who received an income, or is a member of a family that received a total family income, for the 6-month period prior to registration for the program that, in relation to family size, does not exceed 175% of the USDOL Lower Living Standard Income Level. Additionally, an individual receiving, or determined eligible to receive food stamps during the 6-month period prior to application; an individual who qualifies as homeless under the Stewart B. McKinney Homeless Assistance Act; or an individual with a disability whose own income meets the definition of low income, but who is a member of a family whose income does not meet the definition.

Employed Dislocated Workers – self-sufficiency is 75% of the wage at dislocation.

Employed dislocated workers may qualify for services as needed to retain employment leading to self-sufficiency or if their current wage is less than 75% of their wage at dislocation. The training request must be reasonable in relation to the current use of training dollars, and local labor market conditions (high growth/high demand) and what appears to be a prudent use of taxpayer dollars.

(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.

- This determination is made when the dislocated workers are laid off from positions with skill sets that are considered obsolete.
- If the local market is saturated with similar skill sets and retraining would increase their chances for successful employment at a self-sufficient or previous wage or better.
- The industry/occupation requires additional training for the job seeker to have the skills the current labor market demands to obtain employment.
- Labor market information, both formal and informal, has shown the industry or occupation as

declining.

- Individual cannot return to their previous industry or occupation because they have physical or other limitations, which would prevent reentry into the former industry or occupation, as documented by a physician or other applicable professional.
- Individuals that may have worked seasonally can be considered unlikely to work in a previous industry or occupation as a temporary or seasonal worker.
- Individuals laid off on a temporary basis, with a specific return date do **not** meet the criteria of unlikely to return work in a previous industry or occupation.

(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).

This is defined as a need for additional education, vocational training, or intensive career counseling and related assistance, in order to enter and/or participate successfully in regular schoolwork or to secure and hold employment. It is further defined as follows: a lack of employability skills, including social skills; an inability to retain jobs (lost two or more jobs during the 12 months preceding eligibility determination), documented by the counselor during initial assessment; or, a lack of prior work experience (the youth has not worked for the same employer for longer than three consecutive months in the one year preceding eligibility determination), documented by the counselor during initial assessment.

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

- Area Labor market information is used to demonstrate the need for training. Data, job openings, ONET, employment opportunities, business voice and other relevant information may be used to demonstrate the need for training.
- Case notes may document the need for training.
- If a potential employer requests specific training in order for an individual to be hired, that will be considered a “need for training.”

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

The 14 elements are provided through a competitively bid contract, community partners and WIOA Title 1 staff. Our goal is to help any youth between ages 14-24 prepare for a productive and meaningful adulthood. We help youth explore and obtain career and training opportunities, find, and keep the right job. We encourage and assist in obtaining a high school diploma and continue lifelong learning. To this end, we partner with our adult education providers to assist in preparation for obtaining a diploma/GED. We work closely with our community colleges and other training providers to provide in-demand occupational skills training for youth.

(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;

We will use multiple strategies to ensure that 20% of the Title I Youth program funding is used for work based learning. The strategies may include but are not limited to:

- Paid Work Experience
- Paid internships
- On The Job Training
- Paid externship components of training programs
- Pre-apprenticeship/registered apprenticeship training

We will review the expenditures regularly to ensure that the 20% expenditure requirement will be 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; and

Our youth population is predominantly out of school youth. To insure we meet the 75% requirement we will continue to focus our efforts on recruiting this population. We plan to recruit youth from areas where out of school youth frequent. Youth tend to respond to social media more than other avenues so we will use Facebook, Twitter, and texting, which we have found to be very effective strategies. We rely on our community partners to refer youth to our program and our program is very visible in the community. Due to the positive experience youth have in our program, many of our youth referrals are word of mouth from youth to their peers. The youth program has an excellent reputation and youth and community partners like to refer youth to our program.

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

Mid-Maryland’s youth program provides the 14 elements through a contracted provider WIOA Title 1 staff, and partner organizations. The program design gives youth the opportunity to participate in a comprehensive year round program. The enrollment process begins with orientation, eligibility determination and an objective assessment where TABE testing and the Individual Services Strategy (ISS) are completed. TABE results are shared between the Contractor and WIOA Title 1 staff to reduce the duplication of testing. Staff then determines an appropriate track or tracks for youth based on the results of the comprehensive assessment. The available tracks are Education, Work-based training and Credentialing and are described as:

Education Track - designed for the youth that need to obtain their Maryland High School diploma or increase their basic skills. Services may include but are limited to:

- Tutoring
- Study Skills instruction
- TABE assessment
- GED Classes
- Successfully obtaining GED or high school diploma
- ABE classes
- English Language Learner (ESL)

Work-Based Training Track – uses a variety of paid work experiences to help youth attain and/or improve work readiness skills and obtain unsubsidized gainful employment.

- **Career exploration and assessment**

- Work skills assessment
- Interest inventory
- Labor market information research;
- **Employment Preparation**
 - Career Interest Assessments
 - Work-Experience - can be in conjunction with GED or other occupational skills trainings. (Currently youth may work up to 25 hours per week @ \$10.00/ hour for approximately 9 months depending on the worksite and program participation.)
 - On-the-Job Training (OJT)
 - Other subsidized employment

- **Successful gains are unsubsidized employment or entrance into the military**

Credentialing Track – training for industry-recognized credentials linked to demand occupations

- **Career exploration**
 - Interest inventory
 - Labor market information research
 - TABE testing
 - Job shadowing
- **Enrollment in training program**
 - Financial aid training program
 - Registration completed
 - Classes scheduled
 - Earn certificate or credential

The development of the ISS is considered to be the “cornerstone” of the process for serving WIOA Out-of-School Youth. The Contractor’s Youth Specialist and the WIOA Youth Coordinator provide guidance and support for each youth to achieve their goals as outlined in the ISS. The Contractor uses proven program activities and established partnerships that engage the youth in education and work essentials. Staff may utilize CareerScope, MWE, O*Net and other career exploration tools to assist the youth in designing a career path, and acquiring in-demand skill sets in an occupation that leads to potential career laddering opportunities.

- (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.**

Basic career services are provided at the first point of entry into the workforce system based on the customer’s needs identified in the initial assessment. If that first point of entry is an AJC an orientation to the American Job Center system services are offered to customers seeking employment and/or training information. They are also offered during the Reemployment Services and Eligibility Assessment Workshop (RESEA) and the Reemployment Opportunities Workshop (ROW) and on an individual basis.

These orientations are facilitated by WIOA Title 1 and/or Wagner Peyser staff. The orientation process provides access to system-wide resources inclusive of partner and community services. Comprehensive services to business are provided through business service consultants, business resource representatives and the business team. Collaboration exists among the partners for the enhancement of workforce services, such as, planning, program development and delivery, and business services. As previously mentioned we support a common intake mechanism amongst partner agencies and plan to work toward a common intake form.

If a customer accesses services through partner programs not co-located at the AJC, basic career services may be provided by the partner agency at that location. If individualized career services will be offered through a partner program, that program will determine if other partners can provide additional individualized services and make appropriate referrals. Any assessments performed through partner programs are shared between programs. An individual employment plan may be developed individually and shared jointly. We may provide joint case management. This avoids duplication and maximizes available services and funding.

Mid-Maryland's AJCs are co-located with Title I, Wagner Peyser, DORS and/or Adult Ed. which streamlines the communication process between programs as well as referral and joint case management. This co-location allows us to blend services that are responsive to our customers' needs. We will continue to work with our TANF partner to better coordinate our services at the AJCs. AJC staff is already familiar with the TANF program offerings and may assist customers with the on-line TANF/Food Stamp eligibility application.

Regular joint meetings will continue to be held between partner programs to share information about services and work on continuous improvement of non-duplicative and customer focused processes.

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

Mid-MD will provide quarterly follow-up services as required for participants who exit the program, for up to 12 months after the first day of employment. Follow up services may include guidance and counseling, career development and further education planning, referral to community resources and assistance with securing better paying jobs, as customer need dictates. Reports are generated to ensure timely follow up that is conducted via telephone, email, wage records or employer contact. Staff enters the follow up contacts in the MWE indicating results and required documentation.

Section 5 – Wagner-Peyser Functions

This Section should include --

- (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.**

Mid-Maryland has been co-located for over a decade and will continue to coordinate customer-centered services. Mid-Maryland is operationally consolidated using a team approach. Many basic and individualized services in the AJC are handled by Wagner Peyser and WIOA Title I. All Basic career service functions have been integrated and cross training has been completed in compliance with the law and state personnel regulations. Features of the integrated system include an orientation process highlighting all partner services where group orientations may be facilitated by a multi-partner team; a common resource area; common job search or job related workshops; technology linkage; sharing of information, resources, and staff; joint case management and funding; combined staff meetings, integrated program planning and trouble-shooting; consolidated business team functions, and a unified commitment to the Maryland Workforce Exchange.

Mid-Maryland's Business Service teams work to provide a comprehensive "demand-side" service approach to the business community. The core team is WIOA Title 1, WP, DORS, LVER. Depending on the type of service, a representative of the local community college, Rapid Response, DSS, and others may also participate. Members of the team attend regular EDA meetings. The team addresses employer needs, outreach to high growth/high demand industries/priority industries, and establishing goals, and recruitment efforts as well as any other item the business needs. We refer to partners and coordinating community resources as needed.

(B) A description of how the Local Board will utilize the Wagner-Peyser program to provide access to local workforce development services for Unemployment Insurance claimants.

We hold special sessions for Unemployment Insurance claimants. We adhere to the requirements of the Re-employment Services and Eligibility Assessment (RESEA) and Re-employment Opportunities Workshops (ROW) programs. State merit staff is currently managing the bi-weekly RESEA and ROW programs to provide services to the UI Claimants. We always attempt to provide comprehensive service to our customers, and access or referrals to partner agencies. We strive to empower our customers with the skills and knowledge to conduct their job search with staff assistance or independently. We also assist job seekers with filing claims in the center and submitting UI appeal request documents. There are UI and Workforce liaisons in headquarters to assist with more complex UI claimant issues.

(C) If applicable, a description of how the Local Board will ensure that migrant and seasonal farm workers in its Local Area will be provided employment services.

In Mid-Maryland, we have a Regional Agricultural Specialist that covers Howard, Carroll and Frederick Counties. If a migrant seasonal farm worker is identified they are contacted and told about the services available and provided information on how to access them. Monthly outreach is also conducted to ensure compliance with MSFW program.

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

This Section should include --

- (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;**

One AJC is currently co-located with Adult Ed. and the other has a collaborative working relationship. We have streamlined and implemented a referral process for job seekers identified as needing adult education and literacy services. Job seekers are provided information on adult education and literacy services during the initial orientation to the AJC and staff may attend Adult Education orientations to give information on AJC services. WIOA mandates will help us to strengthen these existing partnerships.

We will implement a career pathways model when providing workforce and adult education services. In delivering career pathways, we will align employment, training, education and support services. In our Area, achieving a high school diploma is essential based on the requirements of the labor market (see Section 1). Our goal is for individuals to eventually become self-sufficient and on a career trajectory. This may occur once they have obtained their diploma or concurrently, if it will result in successful completion of both.

The Title II partners along with other WIOA Core partners will meet quarterly to ensure continuing alignment of services. Additionally, the Adult Ed providers meet annually to discuss services and the community college adult ed. providers meet monthly.

Mid-Maryland will review applications in accordance with the guidance provided by the Department of Labor, Licensing and Regulation Division of Workforce Development' Office of Adult Education and Literacy Services and will submit appropriate documentation and any recommendations of alignment of adult education with the local workforce development plan.

- (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:**

- **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.**

Customer service is very important to the partners in Mid-Maryland. We are already addressing alignment to avoid requiring duplicative assessments. We will continue to work together to more closely align adult basic education and English language assessments amongst the other American Job Center partners. We use TABE and CASAS as assessment tools and have agreed to share assessment results. We plan to learn best practices in assessment administration to create a better customer experience. As we "finalize" our assessment procedures, we will develop MOUs to ensure partnership and alignment.

- **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)).

Student/client score information is shared in multiple ways. One of the Adult Ed. providers is also a subcontractor for the WIOA youth program; students who participate in both programs have score information shared through staff in that program. Otherwise, staff at each program send score information through the students themselves in order to comply with FERPA and WIOA/County privacy requirements. When needed, we request that clients sign a Release of Information so that we can share the scores.

- **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.**

To promote customer service and expedite the testing process, partners may accommodate clients needing assessment from the other partner, if the client is appropriate and eligible for the assessment service. The primary partners administering assessments will be the Adult Education and WIOA Title I partners.

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

Partners will share testing schedules on a regular basis. As the need arises, more structured procedures will be developed to facilitate the coordination of testing. As previously identified, a process has been developed for sharing scores.

- **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.**

HCC will train Mid-Maryland counselors once per year or as needed in TABE administration and proctoring best practices. The Adult Ed. provider will also inform the center whenever the training is being held locally for Adult Ed. instructors, in case the workforce counselors need training or a refresher and vice versa.

(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 Adult Ed. rep will share the meeting schedule and link to the meeting minutes with other Adult Ed. providers. As relevant and necessary, the Adult Ed. rep will engage the other providers in discussion on local board topics. Board meetings are open to the public and the minutes/schedules are posted on the www.mid-marylandwib.org website.

The Adult Ed rep will reach out to other grantees in the workforce area prior to each meeting and encourage them to review any posted agenda or meeting materials on the WDB website, soliciting any feedback or input to share at the meeting. The rep will also encourage the other grantees to review the posted minutes after each meeting in order to stay informed. The Adult Ed rep will be accessible to

other grantees through standard communication channels, such as phone, email, and in-person. The email communications may be shared as documentation upon request.

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

Multiple Adult Ed grantees currently serve the Mid-Maryland local area, providing a range of services to residents and students. Information sharing happens regularly between the AJC and the Adult Ed. partners to ensure staff of all agencies are familiar with the services provided and eligibility requirements, to facilitate cross-referrals and customer service. As the need arises, the potential exists to hold Adult Ed. classes in the AJC. In Carroll County, Adult Ed. and the AJC are co-located. The local area will consider involving adult education students, at a specific academic functional level required for participation, in IET programs at the AJC as demand/need requires.

Section 7 – Vocational Rehabilitation Functions

This Section should include --

(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.

For many years we have had held AJC meetings and training of direct services staff, including DORS staff, to enhance the provision of services to individuals with disabilities as well as other individuals. DORS has provided technical assistance on who is an appropriate referral, basic eligibility requirements and types of assistive technology. DORS has agreed to provide training to the partners in such areas as: programmatic and physical accessibility, serving individuals with disabilities that require support services, disability etiquette and sensitivity training. Most recently we attended Mental Health First Aid training and De-escalation training. Wagner Peyser, WIOA and DORS staff is co-located in one of the AJCs. We obtain releases of information from customers and share information as needed. We have joint counseling sessions with shared customers. The Business Services team includes DORS representation and we hold many joint events.

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

- Provide intake, orientation, and assessments for job-seekers with disabilities
- Promote employment of persons with disabilities
- Based on a comprehensive assessment of an individual's disabilities, determine an individual's eligibility for services in accordance with the Division's Order of Selection criteria
- Develop an Individualized Employment Plan
- Provide guidance and counseling, physical restoration, and training to financially eligible persons with disabilities
- Provide follow-up services to enhance job retention
- Provide other services as may be available and appropriate
- Provide Pre-Employment Transitioning Services for students with disabilities, as defined by WIOA
- Provide Supported Employment Services for youth and adults with disabilities as defined by WIOA;
- Provide independent living and blind services for seniors to enhance the capacity of persons with disabilities to live unaided in the community
- Provide performance information as required by WIOA
- Provide cross training of Workforce staff on disability related issues
- Provide technical assistance 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.

Individuals with disabilities will keep receiving services through the AJC. Customers with disabilities will have access to all services and will be referred to DORS if they need to receive services beyond those available through the other AJC partners. We will co-case manage customers and share resources to benefit the customer. In addition, our goal is to ensure that all information and services provided are accessible to individuals with disabilities.

We recently upgraded equipment in the AJC to ensure compliance and accessibility. Even though DORS is co-located in one of the AJCs we may request a review of our centers to insure ease of accessibility and promote services for individuals with disabilities.

Section 8 – Temporary Assistance for Needy Families Functions

DHR, in partnership with the 24 local Departments of Social Services (LDSS) and the WIOA Partners, will implement this new mandated partnership using a phased in approach over the four year period of Maryland's WIOA Combined Plan in all 12 Workforce Development Areas Statewide. This will allow for strategic and thoughtful roll-out, flexibility based on crucial local needs and input, evaluation and ability to change course as needed. With guidance and technical assistance from DHR and DLLR, Local Areas will

work to implement a functional approach to integration which may include revised practices and policies related to:

- Eligibility
- The range and of services
- The use of funds for supportive services
- Income support
- Performance measurement
- Reporting requirements
- Administrative structures and decision making

The phased in schedule will be informed by the WIOA/TANF readiness assessment data gleaned from both the LDSS and Workforce Development Areas.

This Section should include-

(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.).

We have received the implementation timeline from DHR and are in the third phase. However, we have been and will continue to work locally to serve the TANF customers. Our goal is to increase coordination across the programs to improve efficiency in service delivery and increase the effectiveness of the provided services. We believe a common intake process is pivotal to enhanced customer services. At the present time the electronic data systems used by the various partners do not “talk” to each other. However, we are very hopeful that this will be resolved at the state level. Until that occurs, we are discussing the use of a common intake/referral form to share pertinent data. TANF customers have full access to the AJC resources and are encouraged to use the services of the AJC. We have processes in place to work with the ABAWD customers and are exploring methods to extrapolate what is working in order to improve outcomes for the customers. We plan for on-going meetings amongst partners to keep the communication open for enhanced service delivery.

Additionally, plans are made for DSS staff to provide services at the AJCs. Services provided will include determining eligibility for DSS services or programs, and assisting current DSS customers with questions regarding their benefits. We will adjust frequency based on customer needs.

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

- Potential co-location of LDSS and/or WIOA Partners at AJCs or LDSS depending on the nature of local partnerships and operations
- 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
- Cross train and provide technical assistance to all WIOA Partners about TANF services and programs.
- Ensure that activities are countable and tracked for the TANF Work Participation Rate (WPR)
- Access to business services and employer initiatives to attract and better serve employers

by promoting 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

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

Many of the Core partners serve on multiple community boards together. Much of the intent of these boards is to share information and address the creation of common referral and intake systems. The LDSS and LWIOA in Howard County have staff co-located at the Howard County Multi-Service Center along with many other community partners including the Disabled Veterans Outreach Program and others that serve economically disadvantaged individuals. As of this plan writing, the local AJC and local DSS are collaborating to develop strategies to maximize services to TANF customers, streamline communication and create a seamless approach to service delivery. Carroll County's AJC staff provides orientation to WIOA services to TANF recipients at DSS and the community college provides a job readiness workshop. We are planning for DSS staff to be available at designated times in Mid-Maryland AJCs.

We plan to cross train partner staff to share knowledge, promote commonalities across partners and expand direct-services options available for customers. We expect this will provide for consistently accurate information and that time spent at each agency is value added.

The LDSS will provide a list of WPR "countable" activities to partners, particularly the AJC staff, to increase the understanding of what is allowable. In Mid-Maryland, we believe that when working with a potential employer we should focus on the individual's skill sets and what they can do for the business not the program that provides them support. We strive to fill the needs of our businesses with the best qualified candidates. Recruitments and job search activities, which occur in the AJC, are shared with TANF staff. This will continue to be an ongoing practice. We support the single-point of entry concept and share information.

We plan to meet with partners to identify ways to leverage existing financial and in-kind contribution through the Resource Sharing Agreement.

Through our partner meetings, we are exploring ways to share baseline outcome data for the WIOA system.

(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.

Historically, the WDB has had TANF representation on the Board to represent TANF expectations and we plan to continue to do so.

Section 9 – Jobs for Veterans State Grants Functions

This Section should include --

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

The Board will provide priority of service in accordance with our Veteran POS policy. Please see policy excerpts below:

To meet the training and employment needs of Veterans, the Mid Maryland WDA administers employment and training services to meet the workforce needs of veterans and spouses. These programs are universally accessible to all eligible job seekers; however, certain veterans and eligible spouses receive Priority of Service.

Priority of Service is to give first consideration for program participation to covered veterans and eligible spouses who also meet the eligibility criteria of a USDOL training, employment, or placement service in any workforce preparation program.

Priority of Service may mean:

- A covered person gains access to services or resources earlier than the non-covered persons.
- A covered person receives service or resources instead of a non-covered person when resources are limited
- A covered person is placed at the top of a waiting list for the formation of a training class.

Veterans Priority of Service should take precedence before applying WIOA Priority of Service for recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient.

For universal access programs, such as **Wagner-Peyser services, covered persons must receive Priority of Service over all other program participants.**

In accordance with Maryland's State Plan, veterans and eligible spouses will continue to receive priority of service for all DOL-funded job training programs, which include WIOA programs. However, as described in TEGL 10-09, when programs are statutorily required to provide priority for a particular group of individuals, such as the WIOA priority described below, priority must be provided in the following order:

1. First, to veterans and eligible spouses who are also included in the groups given statutory priority for WIOA adult formula funds. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority for services provided with WIOA adult formula funds.
2. Second, to non-covered persons (that is, individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.
3. Third, to veterans and eligible spouses who are not included in WIOA's priority groups.
4. Last, to non-covered persons outside the groups given priority under WIOA.

Customer Service Flow for Veterans

AJC staff provides core services and initial assessments to veterans.

The receptionist or other American Job (AJC) staff who work at the front desks are trained to determine whether any customers are veterans. Customers who self-attest to veteran status shall receive priority of service from this point forward.

AJC staff conduct the initial *Personalized Needs Assessment* with all new customers (including veterans). If a customer self-attests to veteran status, AJC staff complete DLLR's SBE Checklist to determine whether the veteran qualifies as having one or more Significant Barrier to Employment (SBE).

When the Personalized Needs Assessment is completed, veterans choose from the following options:

1. If the customer qualifies as SBE, and requires intensive services to overcome a barrier to employment, AJC staff assists in setting up an appointment for him/her to meet with Disabled Veteran Outreach Program (DVOP) Specialist.
2. If the customer does *not* require intensive services, he/she is then referred to Basic Career Services resources, WIOA Title I resources, an AJC Job Service Specialist, or other resource as determined appropriate based on the Personalized Needs Assessment.

Note: When a veteran seeks services at an AJC where the DVOP is not currently available because of their rotation schedule, the receptionist provides the customer with the card and contact information of the DVOP and contacts the DVOP via email to provide them with the contact information of the customer so the two can coordinate a meeting time when the DVOP will be stationed at the AJC, if desired.

Eligible Veterans:

For WIOA programs, Priority of Service is available to any Veteran who has served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as defined by 38 U.S.C. 101(2). This definition includes Reserve units and National Guard units activated for Federal Service.

Eligible Spouses

Priority of Service is also available to any "**eligible spouse**" of a Veteran. As defined by 38 U.S.C. 4215(a)(B)(i- iv), a spouse is eligible if he or she meets any of the following four categories:

1. A spouse of any Veteran who died of a service-connected disability;
2. A spouse of any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - Missing in action;
 - Captured in the line of duty by a hostile force; or
 - Forcibly detained or interned in the line of duty by foreign government or power.
3. Spouse of any Veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or,
4. A spouse of any Veteran who died while a disability was in existence.

A spouse whose eligibility is derived from a living Veteran or service member, as is the case with Category 2 and Category 3, would lose his or her eligibility if the Veteran or service member was to lose the status that is the basis for the eligibility (e.g. if a Veteran with a total service-connected disability were to receive a revised disability rating at a lower level). Similarly, a spouse whose eligibility is derived from a living Veteran or service member would lose that eligibility upon divorce from the Veteran or service member. However, a spouse who qualifies under Category 1 or Category 4 would not lose covered status through subsequent remarriage.

Verifying Veteran Status

Any individual **self-identifying** as a covered person should be **provided immediate priority** in the delivery of employment and training services. It is neither necessary nor appropriate to require an individual self-identifying as a veteran or eligible spouse to verify his or her status at the point of entry unless the individual who self-identifies as a covered Veteran or eligible spouse:

1. Is to immediately undergo eligibility determination and must be registered or enrolled in a program; or,
2. The applicable Federal program rules require verification of covered Veteran or eligible spouse status at that time.

Similarly, a covered person should not be denied access on a priority basis to any services provided by program staff in order to verify covered person status. Rather, *an individual self-identifying as a Veteran or eligible spouse should be enrolled and provided immediate priority and then be permitted to follow-up subsequently with any required verification of his or her status as a Veteran or eligible spouse.*

For services that require eligibility verification, such as classroom training, verification only needs to occur at the point at which a decision is made to commit the use of outside resources. For example, to receive training services under WIOA Title I programs, veteran status must be verified. In cases such as these, verification is only necessary where a decision is made to commit outside resources to a covered person over another individual. For all other purposes, covered persons should be enrolled and provided immediate priority before providing verification as a covered person.

To receive Priority of Service for career services, covered persons may **self-attest** their veteran or eligible spouse status.

Veterans and Spouses as Dislocated Workers

WIOA Title I Dislocated Worker Funds can help Veterans, separating service members, and eligible spouses to enter or reenter the civilian labor force. To receive services under the WIOA Title I Dislocated Worker Program, a Veteran or eligible spouse must be a dislocated worker. By definition, according to WIOA, a dislocated worker is an individual who:

1. Has been terminated or laid off, or received a notice of termination or layoff from employment;
2. Is eligible for, or has exhausted, unemployment insurance (UI) benefits;
3. Has demonstrated an appropriate attachment to the workforce, but is not eligible for UI and is unlikely to return to a previous industry or occupation;
4. Has been terminated or laid off, or **received notification** of termination or layoff from employment

- as a result of a permanent closure or substantial layoff;
5. Is employed at a facility where the employer has made the general announcement that the facility will close within 180 days;
 6. Was self-employed, but is unemployed as a result of general economic conditions in the community or because of a natural disaster;
 7. Is a displaced homemaker as defined by WIOA 3(16); or,
 8. Is the spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of Title 10, U.S.C.), 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 is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

Generally, service members exiting the military, including, but not limited to, recipients of Unemployment Compensation for Ex-Military members (UCX), qualify as dislocated workers. Active duty service members who separate by retirement may also qualify as dislocated workers. However, an active duty service member taking early retirement as an incentive must be taken on a case-by-case basis. In some cases, this type of separation may be the only choice a service member may have. Thus, the service member's retirement could be considered a *dislocation*. However, if the service member's separation is voluntary, then the service member would not qualify as a dislocated worker.

If a Veteran meets the definition of a dislocated worker, then he/she may also be eligible to receive Priority of Service. For WIOA Title I programs, Priority of Service is available to any Veteran who has served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable. AJCs may consider documentation of a service member's release from active duty on a specific date as equivalent to a layoff notice for WIOA Dislocated Worker Program eligibility. However, service members are not eligible for Priority of Service until they leave active duty.

In the case of separating service members, because they may be on a terminal leave from the military, a separating service member may begin to receive career services while the service member may still be part of the Active Duty military, but has an imminent separation date. It is appropriate to provide career services to separating service members who will be imminently separating from the military, provided that their discharge will be anything other than dishonorable.

JVSG Funds Are Provided to Fund Two Staff Positions

Disabled Veterans' Outreach Program (DVOP) Specialists -- Under 38 U.S.C. 4103A(a), a DVOP specialist provides intensive services and facilitates placements to meet the employment needs of veterans, prioritizing service to special disabled veterans, other disabled veterans, and other categories of veterans in accordance with priorities determined by the Secretary of Labor (Secretary); and

Local Veterans' Employment Representatives (LVER) -- Under 38 U.S.C. 4104(b), the LVER's principal duties are to: (1) conduct outreach to employers in the area to assist veterans in gaining employment, including conducting seminars for employers and, in conjunction with employers, conducting job search workshops and establishing job search groups; and (2) facilitate employment, training, and placement

services furnished to veterans in a State under the applicable State employment service delivery systems.

Monitoring Priority of Service

To ensure priority of service is implemented and operating correctly it will be monitored by the Regional Local Veterans Employment Representative (RLVER) and by the Labor Exchange Administrator or whomever they designate.

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

The Local Veterans Employment Representative (LVER) is part of the business services team in Mid-Maryland. The Local board will engage the LVER, by partnering with the entire Veteran Services Program. The LVER is the primary resource at the American Job Center that will advocate for employment and training opportunities and connect veterans with employers with meaningful employment. LVER's are represented in every county; they each perform outreach to more than 50 employers per month by contacting them via email, telephone calls, and job fairs and /or face-to-face contact. With this in mind, by partnering with the Veterans Program, the Local board will be privy to the state, local and federal businesses and individual contacts, who have also partnered with the veterans program via industry specific hiring events, diversity and recruitment, resource fairs, community driven employer events as well as chamber meetings. Universities and community colleges are targeted by the LVER as well, for support and participation. They help strengthen the veteran network, and in turn, help to provide a collaborative effort to form a workforce system that provides a variety of training, education and employment opportunities.

Mid-Maryland also has a Disabled Veteran Outreach Coordinator. The DVOP specialist facilitates intensive services to those veterans with significant barriers to employment (SBE) including special disabled veterans, disabled veterans, economically or educationally disadvantaged veterans, and veterans with other barriers to employment, especially homeless veterans. The DVOP will provide career counseling, create Individual Employment Plans (IEP) with objectives and goals. The DVOP conducts relationship building, outreach and recruitment activities with other service providers in the local area to assist qualified veterans with significant barriers to employment and provide follow-up services with the goal of obtaining viable employment. The DVOP works in the community and provides outreach to organizations such as the Day Resource Center (a day center for homeless individuals), community colleges, the detention centers and others.

Section 10 – Fiscal, Performance and Other Functions

This Section should include -

(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).

Per an agreement between the Howard County Executive and Carroll County Commissioners, Howard County is the Administrative entity and is the grant recipient. Carroll County invoices Howard County monthly on a reimbursement basis.

(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.

The AJCs in Mid-Maryland are financially stable based on current funding levels and the current resource sharing agreements. Should levels change, we will examine all options, evaluate impact, and adjust our budget and services accordingly.

(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;

We will use our local government(s) procurement processes to award competitive subgrants and contracts. Both Carroll and Howard County governments have Purchasing offices with procedures in place to award competitively bid contracts. Award thresholds are as follows:

Carroll County
\$25000 and above – a formal competitive process is used

Howard County
\$30,000 and above – a formal competitive process is used

We will use our internal risk assessment matrix as part of the evaluation of competitive bids. This tool provides a rating system for low, medium and high risks. (Attachment A)

In both counties in Mid-Maryland, for the Invitation for Bids process, award is made to the lowest responsive and responsible bidder meeting the minimum qualifications,

(D) A description of the local levels of performance negotiated with the Governor and chief elected official pursuant to section 116(c), to be used to measure the performance of the Local Area and to be used by the Local Board for measuring the performance of the local fiscal agent (where appropriate), eligible providers under subtitle B, and the American Job Center delivery system, in the Local Area.

The board has used the DLLR negotiated performance standards as a measure of Mid-Maryland's performance. Historically, performance has been negotiated between DLLR and USDOL then given to the locals. We are open to future negotiations with DLLR.

Performance expectations are identified in the RFP and the contract and subcontract awards.

We use formal and informal satisfaction surveys and feedback to evaluate the effectiveness of the AJC delivery system.

WIOA Performance Metrics	Agreed Upon Goals for PY2016 and PY2017
Adult Measures	
<i>Employment Rate 2nd Quarter after exit</i>	72%
<i>Employment Rate 4th Quarter after exit</i>	70%
<i>Median Earnings 2nd Quarter after exit</i>	\$5,000
<i>Credential Attainment within 4 Quarters after exit</i>	60%
Dislocated Worker Measures	
<i>Employment Rate 2nd Quarter after exit</i>	80%
<i>Employment Rate 4th Quarter after exit</i>	75%
<i>Median Earnings 2nd Quarter after exit</i>	\$8,500
<i>Credential Attainment within 4 Quarters after exit</i>	66%
Youth Measures	
<i>Employment or Placement Rate 2nd Quarter after exit</i>	60%
<i>Employment or Placement Rate 4th Quarter after exit</i>	60%
<i>Credential Attainment within 4 Quarters after exit</i>	60%
Wagner-Peyser Measures	
<i>Employment Rate 2nd Quarter after exit</i>	55%
<i>Employment Rate 4th Quarter after exit</i>	55%
<i>Median Earnings 2nd Quarter after exit</i>	\$6,400

(E) 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.

Mid-Maryland subscribes to a demand-driven philosophy to support the labor market. The core partners participate on the board as well as labor representatives, CBOs, and businesses including the Chamber of Commerce. Mid-Maryland’s board is representative of the Area’s industry composition. The Board meets regularly and is committed to continuing to focus on key areas such as business needs, workforce system effectiveness, youth and customer services to remain a high performing board. Board members are active in a variety of service organizations and boards which allows for increased knowledge and a broad reach in the community. We evaluate the skills required in our region through conversation with business and reviewing LMI.

At the WDB meeting, the Mid-Maryland board reviews the quarterly performance reports, provides feedback and understands the impact of performance. We concur with the Governor’s goal that the workforce system must serve the person rather than focus on performance measures only. In keeping with the Governor’s philosophy, we discuss customer satisfaction surveys for businesses and job seekers and respond with solutions to areas needing improvement. We believe that collaborating with our customers and meeting their needs has resulted in positive performance.

WDB members participate in the development of policies. The WDB have active participants and that

work to expand and increase the levels of partnerships. The Board naturally communicates and develops partnerships between business, labor, education and workforce entities.

The WDB provides oversight and guidance for the workforce system. The board authorizes the Workforce Development Area Director or designee to handle day-to-day operations and make operational adjustments as necessary.

(F) 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.

Mid-Maryland will continue to support WIOA participants training through Individual Training Accounts (ITA) in accordance with the law and applicable local policies. There is no sequence of service requirement for “career services” and training. WIOA participants who seek training services:

- Must be unlikely or unable to obtain or retain employment with current skills, that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment;
- Is in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
- Has the skills and qualifications to successfully participate in the selected program of training services.

After assessment, consultation and guidance with WIOA staff, and substantiation of labor market information and labor demand, together participants and staff will determine the need for an ITA. The training emphasis will be in response to local/regional labor market needs, specifically in high growth, high demand and priority industries and occupations. In consultation with WIOA staff, participants may select a training vendor from the list of approved providers on the statewide WIOA Eligible Training Provider List (ETPL). ITAs are the primary method to be used for procuring training services under WIOA. Standard exceptions to using a provider on the ETPL are listed below:

- On-the-job training, which may include placing participants in a registered apprenticeship program, customized training, incumbent worker training, transitional jobs and internships and work experience;
- There are insufficient providers;
- There is a training services program with demonstrated effectiveness offered in the local area by a community-based organization or other private organization to serve individuals with barriers to employment;
- It would be most appropriate to award a contract to an institution of higher education or other eligible provider of training services in order to facilitate the training of multiple individuals in-demand industry sectors or occupations, and such contract does not limit customer choice.
- Additionally, we may determine that providing training through a combination of ITAs and contracts is the most effective approach.
- If an individual has been offered employment contingent upon obtaining a skill or specific training Mid-Maryland will support the training, even if it is not on the ETPL or is not a priority industry).

ITA limits on duration and value are established based on the participant’s needs and circumstances, funding availability and allocations and local labor market demand. Adjustments may be made after

submission of quarterly reports. Ceiling values are based on current obligations, expenditures, accruals, and balances. Mid-Maryland conducts an on-going assessment in terms of balance of funds and anticipated numbers to be served. Leveraging of funds with partner agencies is routinely used. Unique funding requests may be approved on a case-by-case basis when there is no anticipation of a future funding shortage. The amount of an ITA for youth is determined on a case-by-case basis. In Mid-Maryland, we support training that includes career pathways. Participants are required to acknowledge by signature that they have been notified of the requirement to apply for Pell Grants or other awards, as applicable. Management must approve the ITA before it is submitted to the Fiscal Manager for availability of funds.

- (G) 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 customer always has the choice of an ITA, if available and access to the ETPL. In certain circumstances a contract for training services or classroom-sized training may be developed. For example, if employers are in need of specific skills, then contract or class-sized training may be more timely and cost effective. Or if there is a shortage of training available, within a reasonable timeframe, then contract or class-sized training may be used to support the local and regional economies. Additionally, if it is more effective to train a group rather than individuals then we may use contract training. Mid-Maryland plans to develop the contract with the training provider for group training. There may be situations where an employer may be included in an agreement. For example, if we there is an OJT in conjunction with classroom training then the training provider and business hosting the OJT may be include in an agreement. Mid-Maryland has not traditionally used customized training; however, we will leave that option available to support business. Mid-Maryland has established both ITA and OJT guidelines and policies outlining the process and minimum requirements.

- (H) A description of the process used by the Local Board, consistent with subsection (d), to provide an opportunity for public comment, including comment by representatives of businesses and comment by representatives of labor organizations, and input into the development of the Local Plan, prior to submission of the plan;**

The Plan will be posted on each of the county websites and the Mid-Maryland WDB website. We will post the link on Facebook and have hard copies of it at each AJC front desk. As part of the planning process we obtained input from labor organizations and business in the preparation of the plan.

- (I) 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 Maryland Workforce Exchange (MWE) is used as the primary tool by Title 1 and Wagner Peyser staff to provide and track services to job seekers and businesses.

Job seekers register in MWE and are encouraged to complete the on-line resume. Job seekers receive training in the use of MWE in an individual or group format and staff assistance is available, if needed. Job seekers use the MWE to search and apply for available positions, labor market information,

education and training and career and workforce information.

Staff uses MWE to assist job seekers with registration, job search, career information and labor market information. Staff completes the WIOA program enrollment applications, tracks services and documents program participation through case notes. MWE is used to produce reports for staff and management to ensure quality and performance. Staff provides training on the use of MWE as a job search tool for partners and as a recruitment and labor market information tool for businesses.

LMI based on the Maryland Workforce Exchange is shared with partners. Partners will use the Maryland Workforce Exchange as a tool to assist job seekers and businesses. Currently, each partner has their own intake and case management information system they are required to use by their respective agencies. It is redundant and inefficient to expect the same information to be data entered into multiple systems. When a fully integrated system for intake and case management is available, the WDB will encourage the use of the Maryland Workforce Exchange as the primary system.

(J) 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:

- **The roles and responsibility of staff in facilitating this procedure.**

Mid-Maryland's staff is responsible for performing oversight and monitoring WIOA activities of subgrantees and contractors to determine compliance with regulations and WIOA rules. It is divided between program and fiscal staff. For example, program staff reviews client eligibility, eligibility of services, and compliance with client documentation requirements. The Fiscal staff may review financial documentation standards, systems of internal controls, allowable costs, adequacy of financial reporting and records retention.

- **A requirement that all subgrantee agreements and contracts be monitored at least annually.**

As notated in section 10 (c), Mid-Maryland WDAA follows a monitoring process in compliance with the Sub-recipient policy. On-site monitoring is required at least annually.

- **Procedures for determining that expenditures have been made against the cost categories and within the cost limitations specified in the Act and WIOA regulations.**

Mid-Maryland WIOA (WDA) incorporates the Cost Allocation Plan and determination of allowable versus non-allowable costs into the monitoring process. This information is provided as part of the Request for Proposal, as well. In addition to the annual on-site monitoring process, the expenditures are tracked monthly as invoices are submitted for reimbursement. Managers review the invoices to ensure accuracy, validity, completeness and eligibility of costs.

- **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.**

Mid-Maryland staff will communicate regularly with subgrantees and contractors. As part of the Cost Allocation Plan, Mid-Maryland WIOA (WDA) reviews updates to regulations and makes adjustments as necessary. Notification of updates may come from multiple sources, including but not limited to; fiscal and MWA meetings, communication from the Department of Labor, Licensing and Regulation, communication from the Department of Labor, communication from the OMB.

Mid-Maryland uses a combination of desk review and on-site monitoring. Mid-Maryland's annual fiscal and programmatic on-site monitoring process includes interviews with the entity's pertinent staff and a sample review of payroll and expenditures. Programmatic monitoring also includes interviews with a sampling of the program's active participants and a sample review of participant records using random-sampling and data validation techniques. An Audit Trail and Review questionnaire is used for the fiscal portion of the monitoring.

Prior to on-site monitoring, a desk review of participant records is conducted at the local office. A program monitoring instrument, DLLR's Youth Eligibility Determination questionnaire and an interview questionnaire designed to assess the participant's knowledge of the program and services received are used for the programmatic portion of the monitoring.

- **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.**

Findings are recorded on the monitoring instruments during the on-site review. All findings will be communicated to the subgrantee and contractor for review and response. A fiscal and programmatic report will be issued within thirty (30) days of the completion of the review and includes the following: background, results of the review, findings, corrective action if required and summary. The review is complete if no corrective action is required.

A corrective action plan shall be documented by identifying the finding(s) and the action that the entity will initiate to correct the problem and the time frame in which the problem will be resolved. In the event it is not possible to resolve, the finding(s) will stand and be recorded in the report as unresolved. Technical assistance will/may be provided to ensure the finding(s) do not continue.

Technical assistance shall be provided by the monitoring staff as needed. Specific findings and issues shall be addressed using relevant federal regulations, state and local policies. Policies used shall include Mid-Maryland Case Management and Monitoring policies.

- (K) A description of the Local Board's policy and procedures regarding the handling of personally identifiable and confidential information.**

The local board complies with local government policy regarding PII and TEG 39-11. It is the practice of the office to secure any PII in a locked storage area. More specifically, case files and customer documentation are kept in locked filing cabinets or secure storage areas. Files and documentation beyond the retention date are shredded. Computers are password protected and quickly timeout to prevent unauthorized access to PII.

- (L) 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:

- 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;

Any person who believes that he or she has been, or is being subjected to discrimination based 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 1 program or activity, may file a complaint. These persons include but are not limited to program applicants, registrants, participants, service providers, contractors, labor unions, community-based organizations, employees, and applicants for employment may file a complaint, either individual or through and authorized representative.

All complaints must be made in writing and be directed to Mid-Maryland Equal Opportunity Officer, BEREC, 224 N. Center Street, Westminster, MD 21157; or directly to the Director, Civil Rights Center (CRC) U.S. Department of Labor, 200 Constitution Avenue, NW, Room N-4123, Washington, DC 20210.

- a. Recipient Discrimination complaints must be filed within 180 days of the alleged discrimination.
 - b. Each complaint must be filed in writing and contain the following information:
 - Complainant’s name and address, or alternate means of contact
 - Identity of the individual or entity that the complainant alleges is responsible for the discrimination
 - Description of the complainant’s allegations, including enough detail to determine if the CRC or Recipient has jurisdiction over the complaint, the complaint was filed in time and that the complaint has apparent merit
 - Complainant’s signature or the signature of the complainant’s authorized representative
 - c. Complaints may be filed by completing and submitting CRC’s Complaint information and Privacy Act Consent Form.
 - d. Both the complainant and the respondent have the right to be represented by an attorney or other representative.
 - e. If a complaint filed with the Mid-Maryland WIOA EO Officer is determined not to be under the local area’s jurisdiction, the EO Office will immediately notify the complainant, in writing, providing a statement of the reason for that determination, notice that the complainant has a right to file a complaint with CRC within 30 days of the date on which the complainant received this notice.
- Complaints and grievances not alleging illegal forms of discrimination. This includes grievances from individuals alleging labor standards violations.

All nondiscrimination complaints (complaints not based on claims of discrimination) must be made in writing to the Mid-Maryland Director or BEREC Manager, within 60 days of the date of the alleged incident.

Information postings regarding Maryland Labor Law are accessible to customers. These contain information pertaining to Minimum Wage, Fair Employment, Child Labor, Health Insurance,

Unemployment Insurance, Equal Pay for Equal Work, Workers Compensation, MD Occupational Safety & Health (MOSH) Program and Wage Payment and Collection. Contact information is included on these postings. We also refer customers to the DLLR website for further information and reference.

- 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.

Remedies for violation of any requirement may include:

- Suspension or termination of payments to a program participant or vendor under WIOA Title 1.
- Suspension or termination of payments to or contract with an employer who has violated any requirement under WIOA Title 1.
- Efforts toward reinstatement of an employee when applicable.
- Other equitable alternatives.

(M) 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.

We provide universal access and will provide reasonable accommodations to qualified individuals. We comply with our County Governments’ Equal Employment Opportunity and ADA requirements. The Howard County code describes the hiring preference for individuals with disabilities. The counties have staff dedicated to coordination of the ADA and assist with assuring compliance. Additionally, AJC documentation has a notice of accessibility on it and the information for whom to contact to arrange accommodations.

Mid-Maryland written materials contains the following statement

Equal Opportunity Program: As an equal opportunity program; discrimination in WIOA Title I financially assisted programs or activities is prohibited by federal law and by Howard and Carroll County Governments. Auxiliary aids and services are available upon request to individuals with disabilities. For accommodations in Howard County, please contact Stephanie Hill at 410-290-2620, TTY 410-312-0827 or for Carroll County, contact the Americans with Disabilities Act Coordinator at 410-386-3800, 1-888-302-8978, MD Relay 7-1-1/1-800-735-2258 or email

Mid-Maryland assures that we will provide reasonable accommodations to qualified individuals with disabilities unless providing the accommodation would cause undue hardship.

(N) 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.

Please see Sections 3 (G) and (H).

(O) 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.

We follow County policies and procedures to ensure effective communication with individuals with disabilities, including individuals with visual or hearing impairments. We use the state, county and local resources to assist us so that our communication with the above-mentioned individuals is as effective as communication with others. Specific steps to follow are prescribed to ensure effective communication. For example, staff may use the Maryland Relay service, TTY or sign language interpreters. As appropriate, we may use written notes, assistive listening devices, email, videos or translation services. The resource centers are equipped with accessible workstations that were upgraded recently. Additionally, we will access our DORS partner resources, as appropriate.

The ADA tagline is on outreach material and forms. We use the Universal language poster at the front desk to identify which language a customer may be speaking. In Carroll County, the process to provide a translator is handled through the Carroll County Governments ADA coordinator. In Howard County, the process is handled through the direction provided in the Howard County Limited English Proficiency Implementation policy. Additionally, we may follow the state LEP policy.

Equal Opportunity Program: As an equal opportunity program; discrimination in WIOA Title I financially assisted programs or activities is prohibited by federal law and by Howard and Carroll County Governments. Auxiliary aids and services are available upon request to individuals with disabilities. For accommodations in Howard County, please contact Stephanie Hill at 410-290-2620, TTY 410-312-0827 or for Carroll County, contact the Americans with Disabilities Act Coordinator at 410-386-3800, 1-888-302-8978, MD Relay 7-1-1/1-800-735-2258 or email

(P) 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 speaking individuals.

There are signs posted in the Resource Center that language assistance is available for non-English speakers. The AJC front desk/resource center will use the Language Identification Card to help identify the language the individual speaks. We use the language line which is an over the phone interpretations service, as appropriate. In order to assist the customer we will provide in-person interpreter service.

(Q) 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.

The Mid-Maryland Workforce Development Area follows County Government's procurement systems. Mid-Maryland assures that its procedures conform with the standards and regulations found in 2 CFR 200 Uniform Administrative Requirements Cost Principles, And Audit Requirements For Federal Awards. If

instances exist where there is a difference between County and federal procurement guidelines then the more stringent guidelines will be followed. Below are links to Howard and Carroll County Purchasing,

<http://ccgovernment.carr.org/ccg/purchase/>

https://www.municode.com/library/md/howard_county/codes/code_of_ordinances?nodeId=HOCOCO_TIT4COPUPR_SUBTITLE_1PU

(R) 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 29CFR Part 97 and 29 CFR Part 95.

We follow our local government's acquisition, management and property disposition policies and procedures and adhere to DOL regulations set forth in 2 CFR Part 200. The specifics are spelled out in the Carroll County Maryland Capital Asset and Surplus Property Procedural Manual and Howard County Government's Purchasing manuals and policies.

If instances exist where there is a difference between County and federal procurement guidelines then the more stringent guidelines will be followed. Below are links for Howard and Carroll County Purchasing,

<http://ccgovernment.carr.org/ccg/purchase/>

https://www.municode.com/library/md/howard_county/codes/code_of_ordinances?nodeId=HOCOCO_TIT4COPUPR_SUBTITLE_1PU

(S) 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 Mid-Maryland Board has a conflict of interest policy that each board member must sign. It includes conflicts related to the awarding of contracts.

(T) 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.
- permits the tracking of program income, stand-in costs, and leveraged funds.
- is adequate to prepare financial reports required by the State.

The Accounting procedures for Mid-Maryland are prepared in accordance with Generally Accepted Accounting Principles (GAAP). Through a combination of specially designed Excel worksheets, the Howard County SAP system and Carroll County FMS system, control of obligations and expenditures is maintained. The County financial system records the amount of funds available for each grant, the amount of

expenditures, and the current balance. Both counties' accounting system utilizes a Microsoft Excel based format for tracking and compiling all financial information of the Mid-Maryland WIOA offices. The information will be used to generate Requisitions for Cash, Quarterly Status Reports, Final Closeout Reports, and any other ad hoc reports as needed by the Director and the WIB.

On a monthly basis, the Howard County Department of Finance's Detail Listing of Obligations vs. Budget and the Trial Balance By Accounting Distribution shall be reconciled with the OWD accounting system. After all transactions have been accounted for and any corrections made (through journal entries) the accounting system has been verified to begin report preparation.

Mid-Maryland does not have program income, stand-in costs or leveraged funds.

(U) An identification of key staff who will be working with WIOA funds.

- Carroll County BERC: Christine Cruz, Fiscal Manager
- Howard County Office of Workforce Development: Ji Mar, Fiscal Manager
- Francine Trout, Director, Mid-Maryland Workforce Development Area
- Denise Rickell, Manager, Business and Employment Resource Center

(V) 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.

A detailed Cost Allocation Plan (CAP) is used detailing allowable and non-allowable costs as well as appropriate categorization of costs. Both Howard County and Carroll County also maintain detailed procedures for all fiscal aspects regarding WIOA funds. Included in the procedures is the process for documentation and tracking of the completeness, accuracy and validity of all training vouchers issued as well as allocation of salary expenses. This system of internal controls verifies that all training expenditures are issued and paid only for clients and training. All expenditures are reconciled on a monthly basis. Carroll County sends a monthly invoice to Howard County for reimbursement. As the administrative entity, Howard County prepares the reports for Mid Maryland and sends them to DLLR.

(W) Provide a brief description of the following:

- **Fiscal reporting system**
Mid-Maryland's fiscal reporting system uses Microsoft Excel, Carroll County's FMS Financial System and Howard County's SAP Financial System.
- **Obligation control system**
Obligation control system consists of one Microsoft Excel Master Control Log per Fiscal Year that consecutively tracks training vouchers and other obligations. Data fields within this system include: voucher control number, date of issuance, training institution, client name, category of training, funding stream, dates of training, counselor initials and dollar amount of training. Carroll County also uses specially designed Excel spreadsheets to maintain obligations monthly against available grant funds.
- **ITA payment system**

Documented procedures exist for all steps within the payment process. Briefly stated, the invoices that are received are compared against the Obligation Control Log as referenced above. Verification of the accuracy of client name, training name, dates of training and dollar amount of training is completed by the Fiscal Manager. Once verification is completed, the invoices are entered into the Counties Financial system. All invoices are routed to management for approval in the financial system. Prior to approval, the invoices are verified in the MWE system for authorization and validity of the invoice. Processing of checks and submission to training institutions is completed by the County Accounts Payable centralized function.

- **Chart of account system**

Mid Maryland utilizes the Chart of Account System as created and maintained by the County Finance Department.

- **Accounts payable system**

County Finance offices use SAP and FMS financial systems.

- **Staff payroll system**

Staff of Mid–Maryland submit bi-weekly timesheets coded to the grant funding in accordance with the allocation of time spent on the grant activity in the respective funding stream.

All timesheets are manually approved by management. These timesheets serve as the source documentation for recordation into the payroll allocation spreadsheet. This spreadsheet contains algorithms to translate the hours spent for each individual staff member to the appropriate funding stream in accordance with hours documented on the timesheet.

All payroll for the County is processed by each County’s Centralized Payroll Department for payment and payroll tax reporting.

- **Participant payroll system**

Participant payroll system is the same as the staff payroll system.

- **Participant stipend payment system**

Mid-Maryland does not use a participant stipend payment system at this time.

(X) 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.

Mid-Maryland WIOA does not maintain physical custody of cash assets other than a \$50 petty cash fund that is reconciled with the County Government. There is not a physical custody of check stock. All cash deposit, disbursements and reconciliation of the bank reconciliation activities are maintained within the appropriate County Department in accordance with proper segregation of duties’ controls.

Mid-Maryland WIOA operates on a cash reimbursement basis. The Area’s requisitions are based on reimbursement for accrued expenditures already incurred.

Upon receipt of the revenues (reimbursed expenditures) from DLLR, by the cashier’s office, the Fiscal

manager is then notified of the deposit and reconciles funds received to the requisitions submitted.

(Y) A description of the Local Board’s cost allocation procedures including:

- Identification of different cost pools
- Procedures for distribution of staff cost between cost categories (Administrative cost, program cost, and indirect cost)
- Procedures used for distribution of funds from each cost pool.
- Description of funds included in each cost pool.
- Description of cost allocation plans for American Job Centers.

Mid-Maryland WIOA follows the below Cost Allocation Plan Procedures:

Mid-Maryland functions and related benefit:

Function	Benefit
Participant Intake, eligibility	Program
Participant meeting, skills assessment, training program development	Program
Counselor training	Program
Participant resume review, mock interview	Program
Customer data management activities	Program
Business services	Program
Job Fair	Program
Membership Dues	Program/Administrative
Staff meetings	Program
Fiscal reporting and funds management	Program/Administrative
Training workshops	Program
Work experience coordination and oversight	Program
Workforce Investment Board Meetings	Program/Administrative
Timekeeping	Program/Administrative
For the purposes of the above chart, program is defined as active funding streams, mainly WIOA, but may be discretionary or other grants as well. Staff salary distribution via timesheet documentation	

is the basis for allocation.

Determination of Allowable vs. Unallowable costs:

OMB Super Circular Title 2 CFR 200.403 sets forth the following language in determining the validity of an allowable cost:

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:

- a. Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
- b. Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
- c. Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.
- d. Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- e. Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part.
- f. Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period. See also § 200.306 Cost sharing or matching paragraph (b).
- g. Be adequately documented. See also §§ 200.300 Statutory and national policy requirements through 200.309 Period of performance of this part.

WIOA Law Appendix IV Part 200 provides regulatory guidance for allowable versus unallowable costs. The costs considered allowable for the Mid-Maryland are:

- 1) Salaries
- 2) Fringe
- 3) Benefits (health insurance, retirement)
- 4) Training for participants
- 5) Supplies
- 6) Data Processing
- 7) Telephone
- 8) Mileage/Travel
- 9) Meeting
- 10) Copier

Costs beyond the categories listed above are discussed by the WIOA Director and Fiscal Manager prior to incurrence to determine whether the cost is considered allowable or unallowable under WIOA law.

Direct Cost Plan:

For those activities where the cost can be directly related to a specific area of benefit, 100% of the cost is charged to the area of benefit. Staff salary distribution as documented by employee timesheets is the basis for allocation for direct costs for those employees whose work benefits multiple funding sources. Examples of direct costs:

- 1) Salaries
- 2) Fringe
- 3) Training for participants
- 4) Supportive Service
- 5) Mileage/Travel
- 6) Supplies

Indirect Cost Plan:

The basis for allocation for indirect costs for Mid-Maryland is staff salary distribution as documented by employee timesheets. Indirect costs are those costs where a clear specifically identifiable benefit area may not be easily determinable for each cost incurred. Indirect costs allocated to Mid-Maryland from the County Government include:

- 1) Data processing
- 2) Health insurance
- 3) Telephone
- 4) Copier
- 5) Meetings

Allocation Basis: Staff Salary Allocation:

Mid-Maryland utilizes an Excel based spreadsheet for the allocation of costs to the benefiting cost objectives. Mid-Maryland *does not* base allocations on projections, funding amount or budgetary data. All allocations are performed using the basis of staff salary allocation. Actual time worked as reported on the employee timesheet approved by supervisor is used as the source documentation for the allocation. Administrative amounts charged are re-allocated based on the percentages of time allocated to program. Amounts are calculated by employee based on their individual pay information. This methodology is utilized for all salary and fringe related expenses. This is also used for those costs that are not specific to one program, such as service costs charged from the County and office supplies.

American Job Center Costs:

The OWD incurs costs as a Partner of the American Jobs Center. When these types of costs are incurred, the OWD Staff Salary Allocation is not utilized as the basis for the recordation of costs. For center related costs, such as furniture for a training room, the DLLR American Job Center Labor Exchange Administrator provides data regarding the number of participants served by the Center under the various funding streams. This participant data is then utilized as the basis for the allocation.

Reconciliation and Adjustment:

At least quarterly, the Fiscal Manager reviews all expenses recorded to the funding streams for validity, completeness and accuracy of costs deemed as allowable. The costs allocated to the grant funding streams are included in this review and analysis. If allowable administrative costs have been allocated to the grant in excess of limits set by the Grantor (for example, 10% cap for administrative costs) these amounts are reconciled and moved out of the funding stream to be charged against the OWD County funding.

Validation and Updates:

This Cost Allocation Plan is reviewed at least annually by the Fiscal Manager and the Director of Mid-Maryland Workforce Area. The basis of allocation is reviewed for verification that the operations have remained consistent and continue to be the most reasonable basis for calculation and distribution of expenses. This review is evidenced by the signature of the Director of Mid-Maryland on the Certificate of Cost Allocation Plan.

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

Mid-Maryland operates on cost reimbursement basis only. If overpayment is made to a vendor, the discrepancy is identified and the vendor is notified of the overpayment both verbally and/or in writing. The vendor issues a manual check made payable to the County. The County's finance office deposits the check which is identified by grant ID code. The collection is recorded to the appropriate grant fund for credit by the local WIOA fiscal staff. Any Overpayment of salaries or fringe would result in the adjustment in the next pay period on the employee's payroll check.

Section 11 – Attachments

Attachment A

RISK ASSESSMENT MATRIX Risk Factors Based on the Subrecipient Organization:

Category	Lower Risk (1)	Medium Risk (2)	Higher Risk (3)
1. Subrecipient Organization Type	University, Colleges, Community Colleges or non-profit subject to federal audit requirements	Non-profit not subject to federal audit requirements	Industry or other for-profit organization not subject to federal or other audit regulations
2. Maturity of Organization	Mature (more than 10 years)	Mature, but not in services to be provided. (The services to be provided are new to the organization.)	Start-up, no fiscal controls in place yet
3. Subrecipient’s prior experience with similar subawards or awarding agency	Subrecipient has prior experience with the same/similar subawards Subrecipient also receives awards directly from the awarding agency	Subrecipient does not have prior experience with type of award, or Subrecipient does not receive Federal awards or is unfamiliar with awarding agency’s requirements	Subrecipient does not have prior experience with the type of programmatic deliverables required by subaward
4. Howard County’s prior experience with Subrecipient	Previous positive experience as Howard County Government subrecipient	Previous experience as Howard County Government subrecipient but may have some minor concerns	New subrecipient or previous negative experience
5. Adequacy of Facilities and Resources	Work occurs in adequate, established space		Subrecipient’s resources are inadequate
6. Audit Results & Accounting/Procurement Systems	Has annual audit with unqualified opinion	Has annual third-party financial audit Subrecipient has a new or substantially changed systems or personnel for project administration	Has not had a financial audit by a 3rd party or current audit has material weaknesses, reportable conditions or findings Responses to the Questionnaire are questionable or indicate a lack of policies, separation of duties, or system controls
7. Audit restrictions/Transparency	Auditors are able to perform testing on all awards	Auditors can perform testing only on part of awards	Auditors not able to perform testing and cannot provide audit reports

Risk Factors Based on the Subaward:

Category	Lower Risk (1)	Medium Risk (2)	Higher Risk (3)
8. Amount/Percentage Passed-through	Lower funding levels or percentage of total funds allocated to subrecipient (e.g. <\$100k)	Funding allocated to subrecipient is a large part of the total award	Funding level>\$500K or >49% of award
9. Scope of Work & Project Deliverables Deliverables necessary in order to achieve project success	Easily met objectives (e.g. reports) Progress based on milestones or observable outcomes	Subrecipient not meeting deliverables, resulting in a change in project scope	No reporting until end of the project, no measurable or observable milestones or outcomes
10. Additional Approvals	No compliance issues involved	Subrecipient has protocols in place to meet compliance requirements	Compliance requirements are in place but subrecipient does not have protocols approve/monitor the requirements
11. Relationship Between Howard County Office of Workforce Development and Subrecipient	Subrecipient is a familiar collaborator	Subrecipient is established, but has no prior direct relationship	No previous collaboration or relationship
12. Howard County Office of Workforce Development’s Familiarity with Award Mechanism	Department is familiar with award mechanism (e.g. contract, grant) and prime sponsor	Department is unfamiliar with award mechanism (e.g. contract, grant) or with prime sponsor	Department is unfamiliar with award mechanism (e.g. contract, grant) and prime sponsor
13. Cost Sharing	Subrecipient has not made commitment to share costs	Subrecipient has committed to fund project costs not paid by the award or subaward	Subrecipient has committed to fund substantial project costs not paid by the award or subaward
14. Rate of Subrecipient Spending on Award	Pace of spending is consistent or slightly greater or less than budgeted amounts per year	Pace of spending is moderately greater than or less than budgeted amount per year	Spending far outpaces or is severely below that which was in the submitted budget

SUBRECIPIENT MONITORING RISK ASSESSMENT SCORING

SUBRECIPIENT NAME: _____

DATE OF ASSESSMENT: _____

Risk Assessment Question #	Score	Risk Assessment Question #	Score
1		8	
2		9	
3		10	
4		11	
5		12	
6		13	
7		14	
SubTotal (?s 1-7)	0	SubTotal (?s 8-14)	0
Grand Total	0		

SCORING AND EXPLANATION OF RISK LEVELS:



Grand Total Range: 14-21 Low Risk

The risk associated with engaging the subrecipient has no anticipated measurable effect on the achievement of the project's goals and objectives.



Grand Total Range: 22-30 Medium Risk

The risk associated with engaging the subrecipient could result in operating inefficiently and/or expending unplanned resources to meet the project's goals and objectives.



Grand Total Range: 31-42 High Risk

The risk associated with engaging the subrecipient could compromise the project's goals, objectives, or compliance the prime sponsor's terms and conditions.

End of Plan