LOWER SHORE WORKFORCE ALLIANCE

FOUR-YEAR COMPREHENSIVE PLAN 2020-2024

WORKFORCE INNOVATION AND OPPORTUNITY ACT

This plan outlines the local policies, procedures, and activities carried out in the Lower Eastern Shore of Maryland as it pertains to the Workforce Innovation and Opportunity Act.

LOWER SHORE WORKFORCE ALLIANCE

Tri-County Council for the Lower Eastern Shore of Maryland

Lower Shore AmericanJobCenter

Serving Somerset, Wicomico and Worcester Counties

Table of Contents

GLOSSARY OF TERMS 3

INTRODUCTION 5

SECTION 1: ECONOMIC ANALYSIS 7

SECTION 2: STRATEGIC PLANNING TO MAXIMIZE EARNING CAPACITY OF MARYLANDERS 8

Table III: Job Openings by Soft Skills 11

Online job postings for the 180 day period ending 2/23/2021, meeting all of the following criteria: 11

• This region: Lower Shore WDA 11

• Excluding staffing companies 11

Table IV: Openings by Hard Skills 12

Online job postings for the 180 day period ending 2/23/2021, meeting all of the following criteria: 12

• This region: Lower Shore WDA 12

SECTION 3: STRATEGIC PLANNING TO STRENGTHEN THE LOCAL WORKFORCE SYSTEM 24

SECTION 4: AMERICAN JOB CENTER DELIVERY SYSTEM 34

SECTION 5: TITLE I - ADULT, YOUTH AND DISLOCATED WORKER FUNCTIONS 42

SECTION 6: TITLE II - ADULT EDUCATION AND FAMILY LITERACY FUNCTIONS 59

SECTION 7: TITLE III - WAGNER-PEYSER FUNCTIONS 65

SECTION 8: TITLE IV - VOCATIONAL REHABILITATION FUNCTIONS 70

SECTION 9: TEMPORARY ASSISTANCE FOR NEEDY FAMILIES FUNCTIONS 72

SECTION 10: COMMUNITY SERVICES BLOCK GRANT FUNCTIONS 76

SECTION 11: JOBS FOR VETERANS STATE GRANTS FUNCTIONS 78

SECTION 12: TRADE ADJUSTMENT ASSISTANCE FOR WORKERS PROGRAM FUNCTIONS 84

SECTION 13: UNEMPLOYMENT INSURANCE FUNCTIONS 86

SECTION 14: SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM FUNCTIONS 88

SECTION 15: WIOA SECTION 188 AND EQUAL OPPORTUNITY FUNCTIONS 90

SECTION 16: FISCAL, PERFORMANCE AND OTHER FUNCTIONS 98
ATTACHMENT A: ECONOMIC OVERVIEW 116
Employment Trends 117
Unemployment Rate 117
Wage Trends 118
Cost of Living Index 119
Industry Snapshot 120
Occupation Snapshot 123
Industry Clusters 126
Gross Domestic Product 127
FAQ 128
ATTACHMENT B: DISCRIMINATION COMPLAINT PROCEDURES 130
ATTACHMENT C: PERSONALLY IDENTIFIABLE INFORMATION 136
ATTACHMENT D: ASSISTIVE TECHNOLOGY PROCEDURES 142
CONTACT INFORMATION 145
SIGNATURES 146

GLOSSARY OF TERMS

Frequently Used Acronyms

AEFL	Adult Education and Family Literacy
AEP	Adult Education Program
BSD	Basic Skills Deficient
CBO	Community Based Organization
DOL	Department of Labor
DORS	Division of Rehabilitation Services
DHR	Department of Human Resources
DSS	Department of Social Services
EARN Maryland	Employment Advancement Right Now initiative
ETPL	Eligible Training Provider List
FBO	Faith-Based Organization
IEP	Individual Employment Plan
ISS	Individual Service Strategy
ISY	In-School Youth
ITA	Individual Training Account
LEA	Labor Exchange Administrator
LMI	Labor Market Information
LEP	Limited English Proficiency
LSWA	Lower Shore Workforce Alliance
LWDA	Local Workforce Development Area
MD Labor	Maryland Department of Labor
MHEC	Maryland Higher Education Commission
MOU	Memorandum of Understanding
MSFW	Migrant Seasonal Farmworker
MWE	Maryland Workforce Exchange
OSY	Out-of-School Youth

OJT	On-the-Job Training
RESEA	Reemployment Services and Eligibility Assessment
RFP	Request for Proposal
ROW	Reemployment Opportunities Workshop
RR	Rapid Response
RSA	Resource Sharing Agreement
TANF	Temporary Assistance for Needy Families
TCA	Temporary Cash Assistance
TCC	Tri-County Council for the Lower Eastern Shore of MD
UI	Unemployment Insurance
WDB	Workforce Development Board
WIOA	Workforce Innovation and Opportunity Act
WP	Wagner-Peyser

INTRODUCTION

Background

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

Section 108 of WIOA requires that each Local Board develop and submit to the Governor a comprehensive four-year Local Plan (2020-2024).

Local Workforce Development Area

The Local Workforce Development Area (LWDA) includes Somerset, Worcester and Wicomico Counties on the lower shore of Maryland. According to the US Census Bureau, the total population was estimated at 181,501 in 2019. The largest city on the shore is Salisbury MD, located in Wicomico County with a population estimate of 32,935. The Chesapeake Bay and Atlantic Ocean surround the region; a significant network of waterways runs throughout the area. Naturally, tourism and agriculture contribute significantly to the makeup of the lower shore. The following information may be helpful in understanding the general demographics:

	Somerset	Wicomico	Worcester	Maryland
Population Estimates (2019)	25,616	103,609	52,276	6,045,680
Land Area, square miles (2010)	319.72	374.44	468.28	9,707.24
Population per square mile (2010)	82.8	263.7	109.9	594.8

Median value of owner-occupied housing units (2015-2019)	$139,100	$175,700	$262,200	$314,800
Median Household Income (2015-2019)	$37,803	$56,956	$63,499	$84,805
Total Employer establishments (2018)	365	2,455	2,189	139,497
Persons in poverty, percent	23.6%	16.0%	9.9%	9.0%

Source: US Census Bureau (census.gov QuickFacts)

WIOA Title I workforce services are provided through the Lower Shore Workforce Alliance (LSWA), governed by the Workforce Development Board. The board includes representation by businesses, workforce partners, and community agencies. Fifty-one percent of board members are members of the business community; the remaining 49% represent labor, community, education, training, economic development and government organizations. This strategic plan combines the requirements of WIOA with the needs of the local workforce under the leadership of the Workforce Development Board.

SECTION 1: ECONOMIC ANALYSIS

(A) An analysis of the regional economic conditions including existing and emerging in-demand industry sectors and occupations and the employment needs of businesses in those industry sectors and occupations. The analysis should identify local priority industries based on employer (and WIOA partner) input as well as how the local board plans to maximize opportunities for sustainable employment through those local industry priorities and needs.

The primary source of labor market data used by the Lower Shore WDB is Chmura's JobsEQ data analytics tool (www.chmura.com/software). JobsEQ provides data on a variety of economic and workforce data focusing on the past, present and future. Using this tool allows the WDB to mine data for planning purposes.

Attachment A shows Employment Trends, Unemployment Rate, Wage Trends, Cost of Living Index, Industry Snapshot, Occupation Snapshot, Industry Clusters, and Gross Domestic Product. The information comes from the JobsEQ "Economic Overview" report dated February 2021.

The Lower Shore Workforce Development Board will continue to prioritize the healthcare industry due to demand as well as the available career pathways and sustainability of careers. Identifying healthcare as a priority industry does not exclude the local area from supporting other industries as data and employer engagement indicate. The strengths of the local area as outlined in section 2C are:

- Strong relationship with the local community college (the only local provider on the Eligible Training Provider List), allowing for open dialog regarding training needs;
- Long history of co-location of multiple workforce partners, allowing an ease in coordination of services;
- Quarterly AJC Leadership meetings allowing for discussion of opportunities and sharing of program offerings;
- Quarterly Business Services meetings allowing for sharing of best practices in meeting workforce needs of businesses.

These strengths allow the local area to specify additional priority industries as well as ways to maximize opportunities for sustainable employment through those local industry priorities and needs.

SECTION 2: STRATEGIC PLANNING TO MAXIMIZE EARNING CAPACITY OF MARYLANDERS

The vision for the State of Maryland, as laid out in the State Workforce Plan and the Benchmarks of Success, is to increase the earning capacity of Marylanders by maximizing access to employment, skills and credentialing, life management skills, and supportive services. The vision requires the State to strengthen and enhance the effectiveness and efficiency of Maryland's workforce system. The first four Strategic Goals of the Benchmarks of Success are to:

- **(A) Increase the earning capacity of Maryland's workforce system customers by maximizing access to employment;**
- **(B) Increase the earning capacity of Maryland's workforce system customers by maximizing access to and use of skills and credentialing;**
- **(C) Increase the earning capacity of Maryland's workforce system customers by maximizing access to and use of life management skills; and**
- **(D) Increase the earning capacity of Maryland's workforce system customers by eliminating barriers to employment.**

This section of the Plan should speak to the first four Strategic Goals of the Benchmarks of Success and include a description of the strategic planning elements consisting of –

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

DATA

In analyzing the knowledge and skills needed to meet the employment needs of businesses, LSWA relies in part on data available in Maryland Workforce Exchange (MWE) regarding advertised jobs: education levels, experience in the job, and job skills. While the information presented here represents data from only a single day in MWE, real job listings are reflected. This information can be used to open up dialogue with businesses to confirm which knowledge and skills are in-need in specific industry sectors.

Business Demand: Education and Experience

Table I: Education Requirements on Advertised Jobs

The table below shows the minimum level of education requested by employers on job openings advertised online in Lower Shore Workforce Region, MD on February 22, 2021.

Education Level	Job Openings	Percentage of Job Openings
No Minimum Education Requirement	68	2.14%
Less than High School	0	N/A
High School Diploma or Equivalent	222	6.98%
1 Year of College or a Technical or Vocational School	1	0.03%
3 Years of College or a Technical or Vocational School	1	0.03%
Vocational School Certificate	24	0.75%
Associate's Degree	19	0.60%
Bachelor's Degree	85	2.67%
Master's Degree	18	0.57%
Doctorate Degree	1	0.03%
Specialized Degree (e.g. MD, DDS)	0	N/A
Not Specified	2,743	86.20%

Source: Maryland Workforce Exchange (Labor Market Facts)

Downloaded: 02/23/2021 12:22 PM

Table II: Work Experience Requirements on Advertised Jobs

The table below shows the minimum required work experience on job openings advertised online in Lower Shore Workforce Region, MD on February 22, 2021.

Experience	Job Openings	Percentage of Job Openings
Entry Level	97	3.05%
Less than 1 year	20	0.63%
1 Year to 2 Years	2,985	93.81%
2 Years to 5 Years	71	2.23%
5 Years to 10 Years	6	0.19%
More than 10 Years	3	0.09%

Source: Maryland Workforce Exchange (Labor Market Facts)

Downloaded: 02/23/2021 12:20 PM

The majority of job listings do not indicate what education level is required. This reinforces the fact that data should not be the only source of information. Employer engagement is imperative in understanding demand.

Likewise, an overwhelming majority of job listings advertise for 1 to 2 years of experience. Review of the job listings and engagement with employers would clarify whether education and experience are interchangeable. Both the Board and the AJC Business Services meetings help us ask questions and development strategies related to this data and balance actual needs with the raw information.

Business Demand: Skills

Table III: Job Openings by Soft Skills		
Online job postings for the 180 day period ending 2/23/2021, meeting all of the following criteria: • This region: Lower Shore WDA • Excluding staffing companies		
Soft Skills		
Skill Name	**Total Ads**	
Communication (Verbal and written skills)	3,865	
Customer Service	2,563	
Cooperative/Team Player	1,741	
Self-Motivated/Ability to Work Independently/Self Leadership	1,293	
Organization	1,143	
Detail Oriented/Meticulous	1,117	
Adaptability/Flexibility/Tolerance of Change and Uncertainty	1,111	
Supervision/Management	814	
Interpersonal Relationships/Maintain Relationships	713	
Enthusiastic/Energetic	712	
Source: JobsEQ®, http://www.chmuraecon.com/jobseq *Copyright © 2021 Chmura Economics & Analytics, All Rights Reserved*		

Table IV: Openings by Hard Skills

Online job postings for the 180 day period ending 2/23/2021, meeting all of the following criteria:
- This region: Lower Shore WDA
- Excluding staffing companies

Hard Skills

Skill Name	Total Ads	
Ability to Lift 51-100 lbs.	786	
Microsoft Office	573	
Ability to Lift 41-50 lbs.	481	
Microsoft Excel	471	
Cash Handling	374	
Retail Sales	366	
Cash Registers	352	
Sales	345	
Merchandising	293	
Microsoft Word	284	

Source: JobsEQ®, http://www.chmuraecon.com/jobseq
Copyright © 2021 Chmura Economics & Analytics, All Rights Reserved

The hard and soft skills date shows that employers are looking for employees with those attributes that we recognize as job or work readiness skills. WIOA career services address these types of preparation skills.

Table V: Advertised Job Certifications Table

The table below shows the top advertised certification groups found in job openings advertised online in Lower Shore Workforce Region, MD in December, 2020.

Rank	Advertised Certification Group	Advertised Certification Sub-Category	Job Opening Match Count
1	Nursing Credentials and Certifications	Nursing	1,648
2	American Heart Association (AHA) CPR & First Aid Certifications	Nursing	1,101
3	Commercial Drivers License (CDL)	Ground Transportation	80
4	Social Worker Credentials & Certifications	Social and Human Services	43
5	American Association of Nurse Anesthetists (AANA) Certifications	Nursing	41
6	National Board for Respiratory Care (NBRC)	Medical Treatment and Therapy	34
7	American Institute of CPAs (AICPA) Certifications	Financial Specialists	16
8	National Registry of Emergency Medical Technicians (NREMT)	Fire Rescue	15
9	Licensed Massage Therapist (LMT)	Medical Treatment and Therapy	11
10	Pharmacy Technician Certification Board (PTCB)	Pharmaceutical	11

Source: Maryland Workforce Exchange (Online advertised jobs data)
Downloaded: 02/24/2021 12:49 PM

The top three certifications reflected on this chart show that employer needs lie overwhelmingly in the healthcare and logistics occupation groups. Courses on the Eligible Training Provider List address these needs and enrollments in WIOA Adult and Dislocated Worker Training Services provide the opportunity for job seekers to gain these in-demand certifications.

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

Employment and Unemployment Facts

Table VI: Current Labor Force

Demographic Profile: Summary[1]						
	Percent			Value		
	Lower Shore WDA	MD	USA	Lower Shore WDA	MD	USA
Labor Force Participation Rate and Size (civilian population 16 years and over)[5]	59.7%	67.6%	63.2%	88,242	3,232,422	162,248,196
Prime-Age Labor Force Participation Rate and Size (civilian population 25-54)[5]	79.2%	85.8%	81.8%	49,369	2,082,710	104,136,254

Armed Forces Labor Force[5]	0.1%	0.6%	0.4%	120	29,233	1,028,133
Veterans, Age 18-64[5]	5.2%	5.6%	4.7%	5,708	211,886	9,398,789
Veterans Labor Force Participation Rate and Size, Age 18-64[5]	72.1%	82.9%	76.3%	4,113	175,608	7,168,168
With a Disability, Age 18-64[5]	10.0%	8.8%	10.3%	10,543	325,210	20,240,504
With a Disability, Age 18-64, Labor Force Participation Rate and Size[5]	41.8%	47.8%	41.6%	4,409	155,329	8,421,018
Disconnected Youth[3,5]	2.3%	2.2%	2.6%	262	6,818	438,452
Speak English Less Than Very Well (population 5 yrs and over)	4.1%	6.8%	8.5%	6,945	381,953	25,647,781

Source: JobsEQ®

1. American Community Survey 2014-2018, unless noted otherwise.
2. Median values for certain aggregate regions (such as MSAs) may be estimated as the weighted averages of the median values from the composing counties.
3. Disconnected Youth are 16-19 year olds who are (1) not in school, (2) not high school graduates, and (3) either unemployed or not in the labor force.
4. Census 2019, annual average growth rate since 2009.
5. Due to a US Census data collection error, data for Rio Arriba County and its sub-geographies are not available for 2017 and later years; data for these geographies and time periods have been replaced with 2016 data as placeholders.

Exported on: Tuesday, February 23, 2021 6:53 PM

Table VII: Seasonally Adjusted Unemployment Rate for Lower Shore WDA			
	Lower Shore WDA	**Maryland**	**USA**
	Unemployment Rate	**Unemployment Rate**	**Unemployment Rate**
January 2018	6.5%	4.2%	4.1%
February 2018	6.4%	4.1%	4.0%
March 2018	6.3%	4.0%	4.0%
April 2018	6.3%	4.0%	3.9%
May 2018	6.4%	4.0%	3.9%
June 2018	6.6%	3.9%	3.9%
July 2018	6.7%	3.9%	3.9%
August 2018	6.7%	3.9%	3.9%
September 2018	6.6%	3.9%	3.9%
October 2018	6.3%	3.8%	3.9%
November 2018	6.0%	3.8%	3.9%
December 2018	5.7%	3.8%	3.9%
January 2019	5.5%	3.8%	3.8%
February 2019	5.4%	3.7%	3.8%
March 2019	5.4%	3.7%	3.7%
April 2019	5.6%	3.6%	3.7%
May 2019	5.8%	3.6%	3.7%
June 2019	6.0%	3.6%	3.7%
July 2019	6.2%	3.6%	3.7%
August 2019	6.2%	3.6%	3.7%

September 2019	6.0%	3.6%	3.7%
October 2019	5.4%	3.3%	3.4%
November 2019	4.7%	3.1%	3.1%
December 2019	4.5%	3.0%	3.2%
January 2020	5.1%	3.5%	4.0%
February 2020	6.6%	4.5%	5.7%
March 2020	8.5%	5.8%	7.8%
April 2020	10.3%	7.1%	9.8%
May 2020	11.4%	8.1%	11.1%
June 2020	11.7%	8.5%	11.4%
July 2020	11.0%	8.4%	10.6%
August 2020	9.8%	7.9%	9.3%
September 2020	8.7%	7.4%	8.0%
October 2020	8.1%	7.1%	7.2%
November 2020	7.7%	7.0%	6.9%
December 2020	7.4%	6.8%	6.6%
Source: JobsEQ®. Data as of Dec 2020. *Exported on: Tuesday, February 23, 2021 7:25 PM*			

Job-Seeker Supply: Education and Experience

Table VIII: Educational Attainment, Age 25-64						
Demographic Profile: Summary[1]						
	Percent			**Value**		
	Lower Shore WDA	**MD**	**USA**	**Lower Shore WDA**	**MD**	**USA**
No High School Diploma	11.0%	8.8%	11.2%	9,560	284,921	18,885,967
High School Graduate	32.2%	23.5%	25.8%	27,997	762,906	43,699,272
Some College, No Degree	22.0%	19.4%	21.0%	19,160	627,335	35,525,113
Associate's Degree	7.9%	7.1%	9.1%	6,890	229,256	15,389,737
Bachelor's Degree	17.1%	22.7%	20.8%	14,871	735,453	35,261,652
Postgraduate Degree	9.8%	18.5%	12.1%	8,498	599,650	20,445,749
Source: JobsEQ® *1. American Community Survey 2014-2018, unless noted otherwise.* *Exported on: Tuesday, February 23, 2021 6:53 PM*						

Recognizing that the educational attainment demographic profile of the population does not necessarily point to individuals in the labor force and/or job-seeking, the demographics need to be balanced with actual job-seeker data.

Table IX: Education Level of Candidates

The table below shows the educational attainment of potential candidates in the workforce system that are looking for jobs in Lower Shore Workforce Region, MD on February 22, 2021.

Education Level	Potential Candidates	Percentage of Potential Candidates
Less than High School	246	2.37%
High School Diploma or Equivalent	2,762	26.64%
Vocational School Certificate	769	7.42%
Associate's Degree	916	8.84%
Bachelor's Degree	2,767	26.69%
Master's Degree	1,208	11.65%
Doctorate Degree	201	1.94%
Specialized Degree (e.g. MD, DDS)	58	0.56%

Source: Job Source: Maryland Workforce Exchange (Online advertised jobs data)
Candidate Source: Individuals with active résumés in the workforce system.
Downloaded: 02/23/2021 8:40 PM

The information regarding education level of job-seekers should be reviewed regularly and compared to the requirements of businesses in order to identify gaps and areas where local providers can build strategies to fill those gaps between job-seeker education and the demand for certain educational levels on the part of employers.

Table X: Work Experience Levels of Available Candidates

The table below shows the experience level of potential candidates in the workforce system that are looking for jobs in Lower Shore Workforce Region, MD on February 22, 2021.

Experience	Potential Candidates	Percentage of Potential Candidates
Less than 1 year	1,141	10.96%
1 Year to 2 Years	516	4.96%
2 Years to 5 Years	1,448	13.91%
5 Years to 10 Years	1,990	19.12%
More than 10 Years	5,314	51.05%

Source: Maryland Workforce Exchange (Online advertised jobs data)

Candidate Source: Individuals with active résumés in the workforce system.

Downloaded: 02/23/2021 8:42 PM

When comparing the work experience requirements of employers reflected in question A of this section, the available candidate pool shows a gap in the experience levels. These reports will be reviewed regularly to identify patterns and then strategies in the event that the gap is confirmed to be ongoing.

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

Wor-Wic Community College is the only WIOA-eligible training provider physically located in the Lower Shore Workforce Development Area. Therefore, Title I Adult and Dislocated Worker participants enroll in Occupational Skills Training programs through the college.

The number of courses offered currently meets the demand of Title I job-seeker customers.

Strengths of local workforce system:

- Strong relationship with the local community college (the only local provider on the Eligible Training Provider List), allowing for open dialog regarding training needs;
- Long history of co-location of multiple workforce partners, allowing an ease in coordination of services;
- Quarterly AJC Partners' meetings allowing for discussion of opportunities and sharing of program offerings;
- Quarterly Business Services meetings allowing for sharing of best practices in meeting workforce needs of businesses.

Opportunities for improvement in the local workforce system:

- Assessment of the workforce needs of businesses;
- Assessing opportunity for additional courses to be added to the ETPL;
- Increased enrollment in Title I Adult and Dislocated Worker Training Services;
- Increased variation in training choices amongst participants.

(D) A description of the Local Board's strategic vision and goals for preparing an educated and skilled workforce (including youth and individuals with barriers to employment), including goals relating to the *Benchmarks of Success*, and 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 vision of the Lower Shore Workforce Development Board is to prepare individuals within the three counties (Somerset, Wicomico, Worcester), including youth and individuals with disabilities, in partnership with businesses and educational providers, to enter the workforce by providing training programs that empower employees with skills needed to obtain gainful employment in the local market. LSWA will ensure all participants are provided access to employment, training, education and supportive services, with particular emphasis on individuals with barriers to employment, to align with their individual goals as well as the goals outlined in the *Benchmarks of Success*.

The Workforce Development Board maintains the following priorities:

1) Strengthen partnerships with industry sectors to make strategic decisions about training and other workforce development needs based on high demands and trends;
2) Sustain the organization through diversification of funding;
3) Improve internal collaboration between partners in the American Job Center;
4) Fill vacancies and maintain engagement of board members.

LSWA strives to meet or exceed performance goals at all times. With all new measures created under WIOA, technical assistance is expected in order to fully train staff on the definitions of the new measures as well as the negotiated goals. Any changes in service strategy suggested due to the new goals will be discussed with the Board.

Performance accountability measures are prescribed in WIOA. Local areas negotiate performance measures every two years.

Table XI: WIOA Performance Metrics

Metric	PY20 State Goals	PY21 State Goals	LWDA PY20 Goal	LWDA PY21 Goal
Title I Adult				
Employment Rate 2nd Quarter after exit	76.0%	76.0%	76.0%	76.0%
Employment Rate 4th Quarter after exit	72.0%	72.0%	72.0%	72.0%
Median Earnings 2nd Quarter after exit	$6,200	$6,300	$5,500	$5,700
Credential Attainment within 4 Quarters after exit	60.0%	61.0%	62.0%	62.0%
Measurable Skills Gain	52.0%	53.0%	55.0%	55.0%

Title I Dislocated Worker				
Employment Rate 2nd Quarter after exit	80.0%	80.0%	80.0%	80.0%
Employment Rate 4th Quarter after exit	76.0%	76.0%	76.0%	76.0%
Median Earnings 2nd Quarter after exit	$8,000	$8,200	$6,500	$7,000
Credential Attainment within 4 Quarters after exit	56.0%	56.0%	56.0%	56.0%
Measurable Skills Gain	52.0%	53.0%	55.0%	55.0%
Title I Youth				
Employment or Placement Rate 2nd Quarter after exit	69.0%	69.0%	71.0%	71.0%
Employment or Placement Rate 4th Quarter after exit	63.0%	64.0%	63.0%	64.0%
Median Earnings 2nd Quarter after exit	$3,410	$3,410	$3,410	$3,410
Credential Attainment within 4 Quarters after exit	62.0%	62.0%	62.0%	62.0%
Measurable Skills Gain	48.0%	48.0%	48.0%	48.0%

Additionally, a state-wide initiative called *Benchmarks of Success* solidifies Maryland's commitment to place "people before performance" and creates a central system-wide vision of increasing the earning capacity of Marylanders by maximizing access to employment, skills and credentialing, life management skills, and supportive services. *Benchmarks of Success* is still in the implementation phase and a significant amount of work is being done through state leadership to align the various partners within the system and to roll out the *Benchmarks* to the local area staff.

SECTION 3: STRATEGIC PLANNING TO STRENGTHEN THE LOCAL WORKFORCE SYSTEM

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

WIOA partners meet quarterly for collaboration. It is imperative to involve both leadership and front line staff. The partners have already identified the following topics for improvement:

- Staff cross training
- Data sharing
- Referral process
- Common intake
- Shared calendar of events
- Communication mechanism for all staff
- Case management collaboration/leveraging of resources for individual participants

These meeting are ongoing and are coordinated by the one-stop operator.

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

Section 121(b)(1)(B) identifies the entities that are required partners in the local one-stop system. The majority of these partners provide services throughout the tri-county area. Partners currently co-located at the Lower Shore American Job Center are: Title I Adult, Dislocated and Youth, Title I Migrant and Seasonal Farmworkers (National Farmworkers Jobs Program), Title III Wagner-Peyser (including Migrant and Seasonal Farmworkers),

Adult Education and Literacy, Vocational Rehabilitation, TAA, JSVG, and TANF. Many of these programs were also previously co-located beginning in 2002 at a different location. Recognizing the value of co-location, the partners have worked together through quarterly Partners' meetings. These meetings are ongoing. Examples of anticipated projects for the Partners' Group are common intake, customer flow, data sharing, staff cross training, and a formal referral process.

Required One-Stop Partner Entity	Local Provider Name	Local Partner	Co-location
Title I Adult	LSWA	Yes	Yes
Title I Dislocated Workers	LSWA	Yes	Yes
Title I Youth	LSWA	Yes	Yes
Title I Job Corps	Not in area	No*	No
Title I YouthBuild	None	N/A	N/A
Title I Native American	None	N/A	N/A
Title I Migrant and Seasonal Farmworkers	Telamon Corporation, through the National Farmworker Jobs Program	Yes	Yes
Title III Wagner-Peyser, including Migrant and Seasonal Farmworkers	MD Labor	Yes	Yes
Adult Education and Literacy	Three providers: Wor-Wic Community College, Worcester County Public Schools, and Somerset County Public Schools	Yes	No

Vocational Rehabilitation	Maryland State Department of Education, Division of Rehabilitation Services (DORS)	Yes	Yes
Senior Community Service Employment Program	MAC, Inc., Area Agency on Aging	Yes	No
Carl D. Perkins Career and Technical Education Act	No employment and training programs in area	N/A	N/A
Trade Adjustment Assistance	MD Labor	Yes	Yes
Jobs for Veterans State Grant	MD Labor	Yes	Yes
Community Services Block Grant	SHORE UP! Inc.	Yes	No
Housing and Urban Development	No employment and training programs in area	N/A	N/A
Unemployment Compensation	MD Labor	Yes	No
Second Chance Act	None	N/A	N/A
Temporary Assistance for Needy Families	Three providers: Department Of Social Services in each county	Yes	Yes

**Job Corps is a required partner only in areas that house a Job Corps Center*

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

Expanding access to employment, training, education and supportive services will begin with gaining an understanding of the services each partner agency provides. Once the services are identified, a group strategy can be developed to expand access to all workforce services for all participants. The American Job Center Partners' Group, consisting of partner agency representatives, meets quarterly to share updates and discuss collaborative efforts.

Individuals with barriers to employment should greatly benefit from agency cooperation by connecting those individuals to additional services. Increased co-enrollment will also be a direct benefit of analyzing the existing services available, since a knowledgeable staff will play a key role in facilitating the coordination of services as well as linking participants to post-secondary activities.

The state plan identifies Maryland's targeted populations as:

- Displaced Homemakers
- Eligible migrant and seasonal farmworkers
- Ex-offenders
- Homeless individuals
- Low-income individuals, including those receiving public assistance
- Native Americans, Alaska Natives, and Native Hawaiians
- Individuals with disabilities, including youth
- Older individuals
- Individuals facing substantial cultural barriers
- Individuals who are English language learners
- Individuals who are unemployed
- Individuals who are long-term unemployed
- Individuals who have a low level of literacy

- Individuals within two years of exhausting lifetime eligibility under Part A of the Social Security Act
- Individuals without a high school diploma
- Single parents, including single pregnant women and non-custodial parents
- Veterans
- Youth who are in or have aged out of the foster care system

Career pathways development includes the participation of the local education system as well as the workforce system. LSWA allows training participants to stack credentials.

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

Communication was achieved primarily by email with one-on-one phone calls scheduled as needed. Working drafts were shared with partners throughout the writing process for assistance in editing. A thirty-day public comment period was provided by listing announcements in the local paper directing individuals to lswa.org for the document. Instructions for submitting comments were included.

(E) Description of the strategies and services that will be used in the Local Area--

LSWA participates with partners in serving businesses via the Lower Shore Business Services Team which meets quarterly and includes members from Economic Development offices, Small Business Development, Division of Rehabilitation Services, Maryland Department of Labor, Department of Social Services, Chambers of Commerce, Wicomico Library and more. Information and resources are shared at the quarterly meetings and through the email distribution list.

- **To facilitate engagement of businesses, including small businesses and businesses in in-demand industry sectors and occupations, in workforce development programs;**
  The Business Services Team has a strong partnership within its members. Partners recognize the need to engage regular business member attendance at these meetings. A strategic effort will be made to improve employer engagement in this group.

Additionally, the Steering Committee of the Workforce Development Board has tasked LSWA staff to increase business engagement; the Business Services Manager's primary role is to identify the needs of businesses so that LSWA can pursue opportunities to fill those needs.

- **To support a local workforce development system that meets the needs of businesses in the Local Area;**
  Staff regularly participates in industry advisory groups established by the Chambers of Commerce, Wor-Wic Community College, and Tri-County Council. Inclusion in these groups opens up opportunities to support the efforts of others in the community and to collect information that could be useful in serving both businesses and job-seekers. Staff will continue to attend these meetings and will provide relative feedback to the Business Partnership Subcommittee. LSWA is committed to partnering on and/or supporting local initiatives such as EARN Maryland which provides funding for industry-focused job training needs.
- **To better coordinate workforce development programs and economic development;**
  Economic development leaders in the community participate in the Business Services Team and have representation on the Workforce Development Board. LSWA's Workforce Director has met with local ED leaders to explore ways to strengthen the relationship between the efforts of the workforce development system with those of economic development goals in the area.
- **To strengthen linkages between the American Job Center (AJC) delivery system and Unemployment Insurance programs.**
  Recipients of Unemployment Insurance (UI) are required to enroll in Maryland Workforce Exchange and can do so on location at the AJC or online anywhere. Additionally, Unemployment Claimants participate onsite in *Reemployment Services and Eligibility Assessment* and *Reemployment Opportunities Workshop* events administered by labor exchange, bringing individuals into the AJC and exposing them to services they may be able to engage in. Encouraging open communication between UI and AJC partners increases access to AJC services as well as partner awareness of UI compliance requirements.

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

Customer satisfaction surveys regarding the AJC are conducted on a regular basis. Additionally, individual agencies conduct their own surveys. Board composition includes multiple "public" sector members who have an ability to provide input from a service-delivery perspective.

(G) A description regarding the implementation of initiatives designed to meet the needs of businesses in support of the strategy described in Section 1, including, where applicable:

- **EARN Maryland,**
- **Pre-apprenticeship and Registered 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.**

EARN Maryland is a state-funded grant program designed to help businesses cultivate a skilled workforce. LSWA is an active partner in two unique EARN projects: Welding, and Metal Fabrication.

When the opportunity arises, incumbent worker training, OJT, and customized training contracts are developed. Business Services staff is dedicated to increasing the number of work-based learning contracts each year.

Business Services staff is working with the Apprenticeship Navigator to increase the number of apprenticeship programs in the local area.

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

Economic development representatives are members of the Workforce Development Board as well as the Lower Shore Business Services Team, allowing the exchange of pertinent information as well as the opportunity for input on services and strategies.

There are three county ED offices as well as a regional ED representative of the Department of Commerce within the tri-county area. LSWA's Workforce Director has discussed strengthening relationships between workforce and economic development. These efforts continue with the goal of working more closely together to support businesses and job seekers.

As a division of Tri-County Council, LSWA has participated in the development of the regional Comprehensive Economic Development Strategy and participates in the workforce goals outlined within that document. The most recent CEDS document is available at lowershore.org.

The local area has a robust network for those interested in small business development, including:

- Worcester County's Small Business Incubator: chooseworcester.org/small-business-incubator/
- Salisbury University's Small Business Development Center: marylandsbdc.org/eastern/index_eastern.php
- HotDesks: hotdesks.org
- Maryland Capital Enterprises: marylandcapital.org
- LAUNCH/SBY: launchsby.org
- M4Reactor: m4reactor.org
- Project Opportunity: project-opportunity.com

For individuals interested in entrepreneurship and microenterprise, the workforce system is able to make referrals to these resources for assistance.

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

In additional to the support services described in Section 5 regarding reimbursement for costs associated with training, staff routinely provide informal referrals so that individuals may seek out other support while in participation. Partners have agreed that a formal referral process should be developed. The referral process and coordination of supportive services will be included as topics for development during the partner workgroup sessions described in Part A of this section. Data sharing restrictions continue to prevent our ability to fully leverage and coordinate resources.

All three Local Management Boards have representation on the Youth Advisory Committee and the LCT from the Somerset LMB serves on the Youth Committee.

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

Staff regularly participates in industry advisory groups established by the Chambers of Commerce, Wor-Wic Community College, and Tri-County Council. LSWA will continue to participate in the Business Services Team and existing industry advisory groups.

Business service representatives throughout the Maryland's eastern shore have formed a partnership to focus on the needs of employers from a regional perspective. This partnership is known as the Eastern Shore Business Services Coalition. The members of this group come from the Lower Shore Workforce Alliance (LSWA), Division of Rehabilitation Services (DORS), and the MD Department of Labor (MDOL).

The Eastern Shore Business Summit (ESBS) is an event that brings together members of the regional business community for a day of information and networking. The ESBS is planned and hosted by the Business Services Coalition, in collaboration with Salisbury University, Eastern Shore SHRM and Bay Area Center for Independent Living. It features speakers and breakout sessions with topics such as navigating new labor and wage regulations, dealing with opioids in the workplace, securing incumbent worker training grants, setting up and administering an apprenticeship program and customized training solutions.

Additional development of specific strategies is ongoing.

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

Participation in industry advisory groups is key to success in promoting and cultivating industry-led partnerships. LSWA is an active partner in two EARN grants and would support additional projects. EARN grants are often able to tap into emerging industries in innovative ways. Whether cooperating in projects by acting as fiscal agent, providing participants, allowing the use of the AJC location or in another supportive manner, LSWA continues to encourage alternative workforce training opportunities in the area.

Staff regularly work with Wor-Wic Community College to identify new training opportunities, additional courses, and grant development.

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

While not engaged in formal agreements with faith- and community-based organizations, LSWA is supportive of these efforts. The Mobile AJC regularly visits CBO locations and is available upon request for special events hosted by CBOs or FBOs. Current or past locations include: Diakonia Inc, Atlantic Club, Woodrow Wilson Community Center, Asbury United Methodist Church, Maryland Coalition of Families, Women 2 Women Day, Crisfield Community May Day, and Salisbury Annual Day in the Park.

SECTION 4: AMERICAN JOB CENTER DELIVERY SYSTEM

(A) List the American Job Centers (AJC) 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 local area includes one comprehensive center located at 31901 Tri-County Way, Salisbury MD 21804. Information about the center is available by calling 410-341-6515 or visiting lowershoreajc.org. The CY21 One-Stop Operator is ProjectNow, LLC.

An additional access point is available in Princess Anne at 30397 Mt. Vernon Road, 410-677-4261. Through collaboration between LSWA, MD Labor, and Somerset County Department of Social Services, the office is staffed and computers are available for job search activities.

In May 2020, LSWA took delivery a new Mobile AJC vehicle which allows the AJC to bring services to locations throughout the Lower Shore. Information about the Mobile AJC is available by calling 410-341-6515 or visiting lowershoreajc.org.

(B) A description of the customer flow system and process used in the Local Area. This description should include eligibility assessment, individualized training plans, and case management. DWDAL's policy on assessments can be found here: http://www.labor.maryland.gov/employment/mpi/mpi5-20.pdf

Customer Flow

All individuals entering the Lower Shore American Job Center check in at the Welcome Desk. Visitors are given a brief triage to determine what brought them to the center and to direct them appropriately. Individuals who are not aware of the overall services within the facility will be given a brief overview.

The individual may identify the purpose of their visit and immediately proceed to their destination.

→ Visitor enters the AJC
→ Visitor identifies purpose of visit
→ Visitor directed to proceed to location

The front desk staff direct new job seeking customers to the job service office where they are greeted and welcomed by staff and provided with assistance in registering for MWE.

→ Job-seeker enters the AJC.
→ Job-seeker enrolls in MWE.
→ MWE and Labor Exchange provide access to job listings, assessment, resume services, Labor Market Information, etc.

Individuals who identify a need for services other than job seeking, either at the front desk or while receiving other services, are referred to the appropriate service provider in the AJC.

Eligibility assessment

Individual programs assess eligibility and provide referrals when necessary.

Training Plans

Individuals in need of Title I Adult and Dislocated Worker training services are provided assistance upon request.

→ Individuals expressing an interest in occupation skills training speak with a career counselor at the American Job Center to learn about available programs, eligibility and the enrollment process.
→ The individual meets with the case manager for eligibility determination and development of Individual Employment Plan.
→ The participant enrolls in and completes occupational skills training.

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

In accordance with Section 121(d) WIOA, the WDB issued a Request for Proposal (RFP) to solicit a qualified One Stop Operator (OSO). At a minimum, One Stop Operators are competitively selected every four years, following Tri-County Council's procurement policy and applicable state and federal guidelines.

(D) A description of how the Local Board will ensure the continuous improvement of eligible providers of services through the system and ensure that such providers meet the employment needs of local businesses, and workers and jobseekers. DWDAL's policy on the Eligible Training Provider List can be found here: http://www.labor.maryland.gov/employment/mpi/mpi9-17.pdf

Youth

Service providers for LSWA currently include youth sub-recipients and training providers. Youth sub-grantees are monitored for programmatic and fiscal compliance. They are also responsible for meeting state and local performance requirements.

Eligible Training Provider List

Regarding the Eligible Training Provider List (ETPL) for courses approved for WIOA funding, LSWA monitors the approved providers in accordance with MD Policy Issuance 2021-11. Provider activities are assessed by reviewing the performance outcomes as identified in our negotiated state performance levels. Customer Satisfaction

Customer satisfaction surveys are available on kiosks at the AJC main exit.

Business Customer Satisfaction

The local area will rely on the Primary Indicators of Performance regarding Effectiveness in Serving Employers. These goals have not yet been finalized.

"Continuous improvement"

Per 20 CFR 678.800:

> **"(c)** Evaluations of continuous improvement must include how well the one-stop center supports the achievement of the negotiated local levels of performance for the indicators of performance for the local area described in sec. 116(b)(2) of WIOA and part 677 of this chapter. Other continuous improvement factors may include a regular process for identifying and responding to technical assistance needs, a regular system of continuing professional staff development, and having systems in place to capture and respond to specific customer feedback."

The WDB is projected to establish a minimum standard for measuring continuous improvement prior to the end of calendar year 2021.

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

Through the state online system, any individual may access Maryland Workforce Exchange (MWE) with an internet connection. Our local libraries allow free internet access. Additionally, the American Job Center Mobile Unit maintains a schedule to bring services to more rural areas of our community. The mobile is outfitted with 8 computers at individual workstation areas and a cellular internet connection making it a totally self-contained resource.

The comprehensive center located in Salisbury also houses the hub for the local Shore Transit public transportation system, allowing individuals greater ease in accessing the building. Shore Transit offers public transportation via fixed route and origin-to-destination services. The mission of Shore Transit is to provide safe, reliable, friendly, and efficient community transportation services to the residents and businesses of Somerset, Wicomico, and Worcester counties in Maryland, on clean, well-maintained vehicles, operated by trained, licensed, professionals, with a focus on excellent customer service.

(F) A description of the roles and resource contributions of the American Job Center partners. DWDAL's policy on Memoranda of Understanding and Resource Sharing Agreements can be found here: http://www.labor.maryland.gov/employment/mpi/mpi9-16.pdf

Partner roles and resource contributions are outlined in the separate *Memorandum of Understanding* and *Resource Sharing Agreement* documents, which are updated more frequently than this local plan. The MOUs and RSAs are available on the lswa.org website located here, https://lswa.org/documents/memorandum-of-understanding-resource-sharing-agreement/.

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

ITA's are used to provide tuition assistance for training courses that appear on Maryland's Eligible Training Provider List (ETPL).

Training is provided to eligible adults and dislocated workers through the eligible training provider and program list (ETPL), comprised of entities with demonstrated capabilities of training individuals to enter quality employment. By definition, courses listed on the ETPL in the local area support in-demand positions. The local area works to identify additional courses based on local demand to the ETPL.

Because Maryland's ETPL and the related eligibility procedures ensure the accountability, quality, and labor market relevance of the training programs, those courses support in-demand occupations. Locally, performance metrics are reviewed to ensure that the courses are actually leading to employment. ETPL's requirements for continued eligibility are also used for this purpose.

ITAs must be directly related to the individual goals established between the participant and the case manager.

(H) 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. Per State and Federal Policy, priority of service for the WIOA Title I Adult Program must be provided in the following order:

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

- **Second, to non-covered persons (individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.**
- **Third, to veterans and eligible spouses who are not included in WIOA's priority groups.**
- **Fourth, to any other populations identified by the Governor or Local Board for priority.**
- **Last, to non-covered persons outside the groups given priority under WIOA.**

Federal citations: 38 U.S. Code § 4215 - Priority of service for veterans in Department of Labor job training programs - https://www.gpo.gov/fdsys/pkg/USCODE-2008-title38/pdf/USCODE-2008-title38-partIII-chap42-sec4215.pdf; A Protocol for Implementing Priority of Service For Veterans and

Eligible Spouses: https://wdr.doleta.gov/directives/attach/TEN/ten2010/ten15-10a1.pdf

The local policy for priority of service is:

Local Workforce Development Boards are required to comply with a specified priority of service requirement for Adult career and training services. Multiple regulatory documents address target populations and priority of service requirements; including Federal Employment and Training Guidance Letters (TEGLs), Maryland's WIOA State Plan and Maryland Policy Issuances (MPIs).

In order to comply with these requirements, it is the policy of this Board that Adult priority of service will be delivered in the following order:

First Priority	*Veterans and eligible spouses (as defined in the Jobs for Veterans Act, 38 USC 4215(a)) who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient*
Second Priority	*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*

Third Priority	*Veterans and eligible spouses who are not included in WIOA's priority groups*
Fourth Priority	*priority populations established by the Governor and/or Local WDB.*
Fifth Priority	*non-covered persons outside the groups given priority under WIOA.*

Additionally, priority of service status is established at the time of eligibility determination and does not change during the period of participation. For the purposes of program eligibility, priority of service will be implemented through priority of intake. Out of a group of individuals who have applied for WIOA enrollment, individuals who are eligible for first priority must be served and processed first, followed by individuals who are eligible for second priority, and so forth.

This policy does not interfere with veterans' priority in the event of limited funding. In the event of limited adult training funds, the veteran and/or eligible spouse receives access to the service instead of or before non-veteran enrollees at the point at which an individual is both: a) approved for funding; and b) accepted or enrolled in a training class.

Policy Approval Date: 9/08/2021

Policy Status: Active

On November 24, 2020, the Department of Labor's Employment and Training Administration (ETA) released Training and Employment Guidance Letter No. 7-20 (TEGL 7-20). The TEGL outlines ETA's vision for providing priority of services to the three priority groups that WIOA specifically mandates are entitled to receive priority of service. Those three groups are: 1) recipients of public assistance, 2) individuals who are basic skills deficient, and 3) those identified as being low-income. ETA envisions that giving priority of service to these individuals means ensuring that at least 75 percent of a state's participants receiving individualized career and training services in the Adult program are from at least one of the priority groups mentioned above, and expects this rate will be no lower than 50.1 percent in any state.

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

Incumbent workers are primarily served through career pathways strategies. Individuals who are employed in a particular area may receive training via an ITA for an upgraded skill within the same career pathway so that a wage increase can become available to them. This policy supports the stacking of credentials.

In accordance with WIOA regulations, up to 20% of local workforce funds may be used to subsidize training activities for incumbent workers to obtain the skills necessary to retain employment or avert layoffs. In order to create an industry-driven approach to incumbent worker training and upskilling. One role of LSWA's Business Service Manager is to initiate IWT contracts with local businesses.

Additionally, Maryland Business Works (MBW), an incumbent worker training program funded by MD Labor and in partnership with the Maryland Department of Commerce is available. Businesses that might benefit from the program are referred to the Division of Workforce Development and Adult Learning to apply. MBW training funds can be used to upgrade the skills of current employees while also creating opportunities for new hires in in-demand occupations and skills. Projects are industry-focused and employer-based, targeting small business, particularly at the local level.

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

Professional development is a high priority and is encouraged for all staff. Examples include:

- Staff meetings allow for review of new TEGLs and MPIs.
- Webinars through such venues as Workforce GPS and Geographic Solutions are the most often used form of staff training.
- Attendance at local, regional and national conferences such as Raising the Bar, National Association of Workforce Development Professionals annual conference and National Association of Workforce Development Board annual conference.
- Contact with MD Labor's office of Workforce Development and Adult Education provides the most direct way to clarify any questions regarding compliance.

SECTION 5: TITLE I - ADULT, YOUTH AND DISLOCATED WORKER FUNCTIONS

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

WIOA employment and training activities are primarily provided to job-seeker customers at the comprehensive AJC in Salisbury MD.

Job seeker services are delivered through MD Labor's Labor Exchange. Any individual may utilize the resources available there. These include computer, fax and phone access for job-related activities. The use of MWE for job search, job matching, labor market research, and other employment activities are available onsite Monday through Friday 8am-4pm. Individual consultations may be scheduled for resume writing and other assistance.

WIOA-funded training services are delivered by Lower Shore Workforce Alliance staff. Adults and Dislocated Workers are served via a customer flow process that includes intake, self-directed Labor Market Research, assessment, work readiness exploration, and consultation.

Occupational skills training is provided by institutions approved by and appearing on the eligible training provider list through an Individual Training Account (ITA). ITAs are limited to a total training cost of $8,900 or two years in duration. The primary provider of training programs in the local area is Wor-Wic Community College located in Salisbury. It is the only approved training provider physically located within the Lower Shore Workforce Development Area. Adult and Dislocated Worker participants who receive occupational skills training research the demand for workers with the skills provided in the course prior to being approved for funding and have a wide range of training programs available to reach their occupational goals. Training services will not be the exclusive role of Title I Adult and Dislocated Worker. In some instances, the services are those that one or more partner agencies may be assisting with or providing. Adults and Dislocated Workers may be co-enrolled across partner programs to leverage resources and expand their options.

Additionally, services are available to Adults and Dislocated Workers either directly through a WIOA partner or through a vast network of community partners. The LWDB seeks to make available as many options as possible to allow a tailored unique experience based on client needs.

The assessment of the type and availability of employment and training activities was conducted through a service mapping exercise performed by the AJC partners.

(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).

DWDAL's policy on Rapid Response can be found here: http://www.labor.maryland.gov/employment/mpi/mpi5-18.pdf

Rapid Response is a flexible strategy that is designed to respond to layoffs and plant closings by quickly coordinating services and providing immediate aid to companies and their affected workers. The WDB will meet the requirements of any state rapid response policy and will work collaboratively with MD Labor to provide Rapid Response services to worker groups in need of such services.

Rapid Response activities will be a coordinated effort that includes the employer, affected workers, LSWA, MD Labor, and other partners. On the lower shore, MD Labor's LEA or other representative initiates contact with employers and collaborates RR services. The LEA works with employers and employee representative(s) to reduce the disruptions on businesses, affected workers, and communities that are associated by job loss. The WDB is committed to working with both Worker Adjustment and Retraining Notification (WARN) and non-WARN businesses and employees to maximize resources in times of job loss.

Generally, Rapid Response Teams provide customized services onsite at an affected company, accommodate work schedules, and assist companies and workers through the challenging transitions associated with job loss. LSWA will participate on the Rapid Response Team to conduct an initial business consultation, deliver an information session for affected employees, and customize additional solutions as appropriate under the Dislocation Services Unit's direction.

(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 development activities. DWDAL's policy on the Title I Youth Program can be found here: http://www.labor.maryland.gov/employment/mpi/mpi8-15.pdf

Youth programs funded by WIOA are provided in the local area by sub-grantees. Providers are selected by Request for Proposal (RFP) method annually. It is the responsibility of each sub-recipient to: engage in participant recruitment, conduct an objective assessment, develop individual service strategies, make available all fourteen program elements, meet performance measures, provide case management and maintain appropriate records. LSWA's youth program providers are responsible for providing access to all fourteen programs elements required under WIOA; services may be made available directly by the provider or by a partner via referral.

Multiple programs may be funded to ensure that a wide variety of eligible individuals is being served, including targeted populations such as most in need, youth with disabilities, English Language Learners and individuals with additional barriers. All youth, including youth with disabilities, are provided with an objective assessment to identify barriers to employment. Goals are established in the Individual Service Strategy to develop a pathway for success. Multiple assessment tools may be necessary since there is no standard approach that will work for all youth, including youth with disabilities.

All current sub-grantees are in good standing and provide appropriate services as contracted and outlined in the *Sub-recipient Handbook on Contract Compliance, Program Guidance and Responsibilities.*

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

The secondary education system includes the Boards of Education in all three counties. LSWA has a close working relationship with representatives in all three counties as the previous In-School Youth program providers funded by LSWA have been the Boards of Education for many years. The previous Youth Council under the Workforce Development Board and the new Youth Sub-Committee of the Board welcome representatives to the regular meetings and value the experience and input from these service providers.

The primary provider of post-secondary education and credentialing programs in the area is Wor-Wic Community College. LSWA and Wor-Wic Community College participate in quarterly meetings to discuss service delivery strategies for WIOA participants related to funding ITAs at the college. This close partnership allows staff to recognize trends, discuss career pathways and portable, stackable credentials and better serves participants by communicating with one another. A representative of Wor-Wic Community College sits on the Workforce Development Board.

These close relationships with the secondary and post-secondary education providers already allow for coordinating strategies, enhancing services, and avoiding duplication of services; coordination of services will continue.

(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.

The comprehensive center located in Salisbury houses the hub for the local Shore Transit public transportation system, allowing individuals greater ease in accessing the building. Shore Transit offers public transportation via fixed route and origin-to-destination services. Individuals needing assistance with the public transportation system can speak directly with a customer service representative at the ticket counter or by calling 443-260-2300.

LSWA provides supportive services on a case-by-case basis to participants enrolled in training. LSWA provides supportive services reimbursements for expenses that are necessary to enable an individual to participate in training services. Reimbursements are made to Adult and Dislocated Worker participants based on need.

Costs must be reasonable and be directly associated with supporting the individual to complete a training program. Examples of allowable expenses include: physical examinations, drug screening, equipment, materials or tools, uniforms, licensing fees, test/certification fees, other costs may qualify at the recommendation of the case manager and upon approval by the director or designee.

Whenever possible, linkages will be made to other community services, which may be able to provide financial assistance.

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

Adult participants are served via Individual Training Account (ITA) for Occupational Skills Training. The ITAs are approved for in-demand occupations.

To participate in the WIOA Adult Program, an individual must meet the following eligibility requirements:

1. 18 years of age or older;
2. U.S. citizen or non-citizen authorized to work in the U.S.;
3. Meet Military Selective Service registration, if applicable.

The updated Adult Priority of Service policy was approved on 9/8/2021.

POLICY: PRIORITY OF SERVICE

Local Workforce Development Boards are required to comply with a specified priority of service requirement for Adult career and training services. Multiple regulatory documents address target populations and priority of service requirements; including Federal Employment and Training Guidance Letters (TEGLs), Maryland's WIOA State Plan and Maryland Policy Issuances (MPIs).

In order to comply with these requirements, it is the policy of this Board that Adult priority of service will be delivered in the following order:

First Priority	*Veterans and eligible spouses (as defined in the Jobs for Veterans Act, 38 USC 4215(a)) who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient*
Second Priority	*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*
Third Priority	*Veterans and eligible spouses who are not included in WIOA's priority groups*
Fourth Priority	*priority populations established by the Governor and/or Local WDB.*
Fifth Priority	*non-covered persons outside the groups given priority under WIOA.*

Additionally, priority of service status is established at the time of eligibility determination and does not change during the period of participation. For the purposes of program eligibility, priority of service will be implemented through priority of intake. Out of a group of individuals who have applied for WIOA enrollment, individuals who are eligible for first priority must be served and processed first, followed by individuals who are eligible for second priority, and so forth.

This policy does not interfere with veterans' priority in the event of limited funding. In the event of limited adult training funds, the veteran and/or eligible spouse receives access to the service instead of or before non-veteran enrollees at the point at which an individual is both: a) approved for funding; and b) accepted or enrolled in a training class.

Policy Approval Date: 9/8/2021

Policy Status: Active

On November 24, 2020, the Department of Labor's Employment and Training Administration (ETA) released Training and Employment Guidance Letter No. 7-20 (TEGL 7-20). The TEGL outlines ETA's vision for proving priority of services to the three priority groups that WIOA specifically mandates are entitled to receive priority of service. Those three groups

are: 1) recipients of public assistance, 2) individuals who are basic skills deficient, and 3) those identified as being low-income. ETA envisions that giving priority of service to these individuals means ensuring that at least 75 percent of a state's participants receiving individualized career and training services in the Adult program are from at least one of the priority groups mentioned above, and expects this rate will be no lower than 50.1 percent in any state.

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

To be eligible to receive WIOA services as a dislocated worker, an individual must:

- Be a citizen or noncitizen authorized to work in the United States;
- Meet Military Selective Service registration requirements (males only);
- Meet the definition of dislocated worker at WIOA §3(15).

A dislocated worker is an individual who meets one of the following five sets of criteria:

1. The individual:
    a. Has been terminated or laid off, or has received a notice of termination or layoff, from employment;
    b. Is eligible for or has exhausted entitlement to unemployment compensation, or has been employed for a duration sufficient to demonstrate attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a state's UI law; and
    c. Is unlikely to return to a previous industry or occupation.
2. The individual:
    a. Has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility, or enterprise;

   b. Is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days; or
   c. For purposes of eligibility to receive services other than training services, individualized career services, or support services, is employed at a facility at which the employer has made a general announcement that such facility will close.
3. The individual was self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters. This includes individuals working as independent contractors or consultants but not technically employees of a firm.
4. The individual is a displaced homemaker, as defined in WIOA §3(16).
5. The individual is the spouse of a member of the Armed Forces on active duty who:
   a. Has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member; or
   b. Is unemployed or underemployed and experiencing difficulty finding or upgrading employment.

Dislocated Workers are served via Individual Training Account (ITA) for Occupational Skills Training. The ITAs are approved for in-demand occupations.

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

The self-sufficiency policy was revised and approved on 6/9/21.

POLICY: SELF-SUFFICIENCY

a) WIOA Section 134(c)(3)(A) indicates that a justification for training must be determined for each individual entering a training program.
b)
c) The following criteria must be met in order for training services to be made available to employed or unemployed adults and dislocated workers
d) Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services;
e) In need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
f) Have skills and qualification to participate successfully in training services.
g)
h) It is the responsibility of the Lower Shore Workforce Development Board to define "self-sufficiency" for the workforce area in order to comply with training services criteria. It is the policy of this board that:
i) Self-sufficiency is defined as wages of $12.38 per hour. The correlates to 200% of the 2021 HHS Poverty Guidelines for one individual.
j) Unemployed individuals selected for enrollment must be entering a training program that has the potential to lead to employment or a career pathway with wages either:
k) above the self-sufficiency definition of $12.38 per hour; or
l) wages comparable to or higher than wages in previous employment .
m) Employed individuals earning less than $12.38/hr who are selected for enrollment must be entering a training program that has the potential to lead to employment or a career pathway with wages either:
n) above the self-sufficiency definition of $12.38 per hour; or
o) wages comparable to or higher than wages in current employment .
p) Employed individuals earning more than $12.38/hr must be entering a training program that has the potential to lead to employment or a

career pathway with wages comparable to or higher than wages in current employment.

Policy Approval Date: June 9, 2021
Policy Status: Active

(I) A description of the Local Board's definition of "unlikely to return to previous industry or occupation" when required for eligibility for Dislocated Worker services.

The Dislocated Worker eligibility policy dated 9/13/17 establishes the following definition:

To establish that an individual is "unlikely to return to a previous industry or occupation", one or more of the following must be true:

- *low industry/occupation demand: Labor market data indicates that the industry/occupation is not in-demand in the local area or that the industry/occupation is experiencing a negative growth rate in the local area;*
- *the individual is no longer able to perform in that occupation or industry due to age, ability, illness/injury, disability, or other barriers;*
- *the individual has conducted a dedicated but unsuccessful job search in the previous industry/occupation for over three months as evidenced by employer rejection letters or employer contact logs;*
- *the individual no longer wishes to work in that industry or occupation;*
- *the industry/occupation requires additional training for the job seeker to have the skills the current labor market demands to obtain employment;*
- *the individual lacks appropriate industry and/or national certification or accreditation for re-hire or re-employment in industry/occupation of lay-off.*

(J) A description of how the Local Board will interpret and document eligibility criteria for in-school youth "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). DWDAL's policy on the Title I Youth Program can be found here: http://www.labor.maryland.gov/employment/mpi/mpi8-15.pdf

The local area does not currently serve In-School Youth.

(K) A description of how the Local Board will interpret and document eligibility criteria for out of school youth "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). DWDAL's policy on the Title I Youth Program can be found here: http://www.labor.maryland.gov/employment/mpi/mpi8-15.pdf

It is the policy of the Lower Shore Workforce Development Board that the local definition of "a low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment" is a low income youth:

- with poor work history, no work history, or who has been fired from a job within the last six months prior to application, or who has never held a full-time job for more than 13 consecutive weeks;
- with an incarcerated parent or guardian; or
- who has a family history of substance abuse.

The documentation to substantiate the eligibility criteria will include school records or referrals, court agency or partner referrals, work history, and/or applicant statement, and will be collected at enrollment application, recorded in the Maryland Workforce Exchange, and made part of the participant's case management file.

(L) A description of the documentation required to demonstrate a "need for training."

WIOA Section 134(c)(3)(i) indicates that eligibility for training services includes a determination that the individual "be 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." LSWA staff determines the need for training through interview, evaluation, assessment, and career planning activities. All individuals seeking training services must engage in:

1) self-assessment questionnaire;
2) labor market research;
3) objective assessment, including review of education and employment history; and
4) development of Individual Employment Plan.

These factors are assessed and documented on the Individual Employment Plan form.

(M) A description of how the Local Board will provide access to the 14 required program elements for the WIOA Youth program design, including whether the Local Board has contracted with youth service providers or not:

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

Youth programs are provided by sub-recipients who are chosen by competitive bid. The proposal must include a description of how each of the elements will be provided and can either be provided directly or by referral. Relevant excerpts from the Program Year 2019 Out-of-School Youth RFP are:

Page 6: *"Access to a Range of Services*

All fourteen WIOA youth program elements are required to be made available to enrolled youth as needed or requested. If a program does not directly provide one of the program elements, it must demonstrate the ability to make seamless referrals to appropriate providers of such services. WIOA youth program providers will have primary responsibility for ensuring that each participant receives the full continuum of services. Services accessed by a WIOA youth participant will depend upon the needs and goals identified by the participant and case manager as documented in the participant's ISS."

Page 6: *"Proposed programs must make available the program elements listed on the following page to all WIOA participants based on the individual's needs.* ***Proposals must outline how each program element will be provided.*** *Not all program elements will be appropriate for all participants. Sub-contracting of individual elements is allowable."*

Page 14: *"Describe how your service delivery model includes all WIOA mandated program requirements (10pts)"*

No provider will be selected who cannot provide access to all fourteen elements. Additionally, the programmatic monitoring process includes review of the availability of each element.

(N) 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.

During the competitive bid process, proposals are evaluated on their ability to provide services that include 30% expenditures on work experience. No provider will be selected who cannot provide a program which incorporates

appropriate strategies. Relevant excerpts from the Program Year 2019 Out-of-School Youth RFP are:

Page 14: *"Describe in detail how your program will ensure that its participants receive an adequate amount of work experience in order to meet the goals developed in their ISS. Explain how you will ensure that a minimum of 30% of your funding will be expended on work experience activities. (15pts)"*

A quarterly work experience is required from each sub-recipient reflecting work experience expenditures.

Additionally, both the programmatic and fiscal monitoring processes include review for compliance with the work experience requirement.

(O) A description of the Local Board's plan goal to serve out of school youth and identify specific steps that have been taken to meet this goal. Local Boards whose goal is under 75 percent must include a description of how they will implement the waiver and how they will enhance connections to Youth Apprenticeship programming, increase DORS co-enrollment, and any changes for In-School-Youth (ISY) services.

Steps Taken:

LSWA carefully planned youth services for program year 2015. With the implementation of WIOA and the significant shift in focus to out-of-school youth (OSY), it was difficult to meet the 75% out-of-school youth funding requirement in the first year. A two-year transition period was needed to meet the goal of providing youth services primarily to out-of-school participants. Note that the first year was program year 2015 (7/1/15-6/30/16) and the second year is program year 2016 (7/1/16-6/30/17).

TEGL 23-14 reminded state and local areas that existing in school youth (ISY) must still be served but not be exited prematurely. In order to meet this requirement, LSWA's youth sub-recipients were encouraged to complete participation by finding other resources for their students, exiting students that are ready to continue on their own, and/or providing services to the extent possible to prepare the student for appropriate exit.

TEGL 23-14 also stated that local areas could, in certain circumstances, spend less than 75% of funds on OSY in the first year, therefore local PY15

funds were awarded to sub-recipients under the following percentages: 66.8% OSY and 33.2% ISY. Although the OSY distribution did not reach 75%, it was a significant increase from 39% in the previous year.

Program year 2016 funds were allocated at 75% OSY and 25% ISY.

The Youth Committee created a Strategic Plan which was approved by the board on December 13, 2017. The plan established the following funding guidelines: "The Lower Shore Workforce Alliance will use local WIOA formula funds for Out-of-School Youth programs in the tri-county area. In-School Youth programs will continue to be funded through alternative funding sources when available such as the Rural Maryland Prosperity Investment Fund and the Summer Youth Connections." Thereafter, Out-of-School Youth programs were allocated at 100%.

The local area continues to allocate 100% of WIOA Youth funds to OSY programming.

(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 AJCs, including Vocational Rehabilitation, Temporary Assistance for Needy Families (TANF), Community Action Agencies, 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 and individualized career services are delivered primarily through MD Labor's Labor Exchange. Individuals seeking services in the AJC benefit from co-location of partners, which allows for "warm handoff" referrals. This allows for a better connection between agencies on behalf of the job-seeker in order to prevent duplication of services.

The AJC Partners' Group meets quarterly with the goal of identifying ways to improve coordination and collaboration. Staff cross-training is the best method to ensure that frontline staff provide the most effective customer service.

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

Case Managers are responsible for providing follow-up services to WIOA participants for 4 quarters following exit by contacting the participant and entering services and/or outcomes into the Maryland Workforce Exchange.

The follow up policy was approved on 3/14/18.

POLICY: FOLLOW UP PROCEDURES

Purpose

To summarize follow-up strategies to assist Adult and Dislocated Worker participants with their long-term success.

Policy

Local areas must provide follow-up services for adults and dislocated worker participants who obtain employment for up to 12 months after the first day of employment.

Follow up services are intended to provide assistance and guidance after entering employment such as supporting progress on the job, referrals for additional services, and other assistance that may increase employment success. Case managers will contact participants on a quarterly basis for one year following exit. The contact may be accomplished by a variety of means that will include telephone, email, mailings, personal contact and contact initiated by a WIOA partner. Follow-up efforts will be documented via electronic case notes in MWE. If there is an indication that additional services may be beneficial, the customer will be referred to the appropriate contact.

There are several situations in which monthly contact is not necessary. These include:

1) *The participant requests not to be contacted anymore.*
2) *The case manager is unable to make contact with the participant. When no response has been received from the participant for two consecutive quarters, the case manager may choose to place the individual in an "inactive follow up status" and make a final follow up*

attempt at the twelfth month. Documentation that reasonable attempts have been made by a minimum of two methods should be included in MWE case notes to reflect the unsuccessful contact.

3) *At the recommendation of the case manager and with approval of the director or designee.*

Follow up is a service separate from measuring performance. However, effective follow up strategies will contribute to gaining information from the individual that can be captured positively in performance.

SECTION 6: TITLE II - ADULT EDUCATION AND FAMILY LITERACY FUNCTIONS

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

Local WIOA Title II Adult Education and Family Literacy Act Providers:

Adult Education of Worcester County Public Schools, 410-632-5071

Worcester County Public Schools Adult Education Program provides adult education, literacy activities and employment programming to the adult learners of their community. Across the county, there are sites for both face-to-face and virtual formats. Classes are available for daytime and evening sessions. The following services are provided to adult learners:

- Intake, assessment and referral based on an individual student's needs and academic ability.
- Instruction through one or a combination of English as a Second Language, Adult Basic Education and Adult Secondary Education Classes.
- Workforce and career development services including: resume, cover letter, mock interviews, job fairs, Mobile AJC visits, Maryland Workforce Exchange and American Job Center referrals and visits.

Adult Education, Somerset County Public Schools, 410-632-3328

Somerset County Public Schools provides adult education services out of the Somerset County Technical High School. The following services are provided to all adult learners enrolled:

- Intake, comprehensive assessments and referrals based in an individual's needs and academic abilities.
- Instruction for all learners in Adult Basic Educational functioning levels 1 through 6. Instructional services for English as a Second language adult learners. Instruction is offered at multiple locations and is a combination of face to face instruction and virtual blended learning. Academic online self-paced educational programs are offered free of charge to students to use at their own pace outside of instructor coordinated learning.
- Workforce and career development services including pre-employment planning and preparation and goal planning for career development and post-secondary educational programs. Referrals to area employment services and agencies and guidance using the Maryland Workforce Exchange.

Adult Education, Wor-Wic Community College, 443-669-6373

Wor-Wic Community College's Adult Education Program provides adult education, literacy activities and employment programming to the adult learners of their community. The following services are provided to adult learners:

- Intake, assessment and referral based on an individual student's needs and academic ability.
- Hybrid instruction (virtual/online or in-person/online) is offered in the English as a Second Language, Adult Basic Education and Adult Secondary Education courses.
- The National External Diploma Program is an online self-paced portfolio-based program for eligible adults and out-of-school youth that obtain qualifying scores on the Adult Secondary Education literacy level. The requirement to obtain the Maryland High School diploma is to complete the portfolio that comprises of life skills and academic tasks.
- Access to college services (i.e. Office of Counseling and Disability Services, Career Services and Campus Food Pantry).

- Networking and collaboration with community partners to promote adult education course offerings to special populations (i.e. homeless, food insecure, returning citizens, at-risk youth, disabled individuals, seniors, persons in recovery and veterans).
- Workforce and career development services include: resume, cover letter, mock interviews, job fairs, Mobile AJC visits, Maryland Workforce Exchange and American Job Center referrals and visits.

The Workforce Development Board will comply with instructions issued by the Division of Workforce Development's Office of Adult Education and Literacy Services regarding reviewing local applications submitted under Title II. Understanding that the review process is to ensure that the proposed Adult Education services are aligned with the local workforce plan, the proposals were forwarded to board members for comment. Due to the time constraints of the review period and with the approval of the WDB, the Steering Committee will provide the required response for each proposal, indicating either that it 1) aligns or 2) does not align with the conditionally approved local 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;**

  Currently, all three AEPs use CASAS Reading Life and Work Series for ESL learners and CASAS GOALS for Math and Reading for ABE/ASE learners. The AJC uses CASAS GOALS for Math and Reading. With all agencies using the same assessment, alignment is complete.

- **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));**

Title I and Title II staff will supply the name and contact information for the point of contact responsible for sharing scores. AEPs will share and accept assessment scores after a signed release of records document is provided. This document must be signed by both the student and the requesting agency. For the AEP, only the Administrator, Coordinator, or Intake Assessment Specialist can make this request and exchange. Appropriate policies regarding protection of Personally Identifiable Information will be followed.

- **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;**

  Intake Assessment Specialists for AEPs administer the appropriate CASAS pre and post-test to all applicants, including Trade participants. This aligns with both MD Labor's Adult Education policy and the local educational agency policy. CASAS pre-testing is administered during the managed enrollment/orientation schedule. Students are then post-tested based on MD Labor guidelines.

  LSWA's Deputy Director provides oversight of testing at the AJC. Staff approved to conduct CASAS eTests at the AJC must first complete the required certification process through the testing organization.

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

  All three AEPs and the AJC utilize the same pre and post-test: CASAS GOALS for Math and Reading. When an adult learner co-enrolls with the AJC, the AEP will provide pre and/or post-test scores upon receipt of a release of records.

- **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.**

  CASAS eTests are currently available in the AJC and can be utilized by partners. No AJC staff member may administer an assessment without completing the required certification process through the testing organization and providing a copy of their test administrator certification to the LSWA Deputy Director before providing assessments.

In compliance with MD Labor's and CASAS Test Assessment Policy, only CASAS Certified staff may administer the CASAS pre- and post-tests. For AEPs, the Intake Assessment Specialist is the responsible staff for administration. CASAS Certification of staff can be found in MD Labor's Adult Education and Literacy Services database and in the appropriate adult education offices. In both agencies, all testing staff maintains their CASAS Certifications to keep abreast of assessment policy and CASAS competencies.

DWDAL's policy on assessments can be found here:
http://www.labor.maryland.gov/employment/mpi/mpi5-20.pdf

(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 Workforce Development Board is in compliance with the requirement that an Adult Education representative serve on the board. In general, non-business members of the Workforce Development Board are appointed for four-year terms. Since there are three Adult Education providers in the area, only one director will be a voting member of the board at a time with rotation of representatives every two years. The appointed adult education representative will be provided with time on the quarterly WDB agenda to provide updates upon request. Through outreach to the other directors in the region, the representative will be able to speak for all three programs.

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

Adult Education services for Wicomico County are available at the American Job Center. Classroom space is used in the AJC during hours as determined necessary for the population. Adult education program participants complete goal setting excersises as part of their intake. Goals include employment and post-secondary education. Based on the goals identified, participants are referred to the Maryland Workforce Exchange

for registration and the open computer lab for assistance with keyboarding and other necessary computer skills. If a participant identifies barriers, referrals are made to Telamon, Department of Social Services and other agencies that specialize in local resources.

Adult education program participants are served in the location that is most convenient to that individual. Due to the location of the AJC, Worcester and Somerset do not provide classes in the AJC. To ensure access to providers in the other counties, AJC staff provides contact information to individuals inquiring about Adult Education who identify themselves as residents of another county.

Worcester County Adult Education office: 410-632-5071; Somerset County Adult Education: 410-632-3328. Information for all three providers is also available on the Mobile AJC.

(E) A description of how adult education providers in the Local Area will use the Integrated English Literacy and Civics Education (IELCE) program under section 243(a) of WIOA to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency. Note: Local Areas should check with all Title II-funded providers in their area; not all adult education providers receive IELCE funds.

Local Adult Education partners do not provide IELCE services.

SECTION 7: TITLE III - WAGNER-PEYSER FUNCTIONS

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

Wagner-Peyser staff at the AJC offers employment services through MD Labor's Maryland Workforce Exchange office. Wagner-Peyser has been co-located in the AJC since 2002. The local Labor Exchange Administrator actively participates as a voting member of the Workforce Development Board.

Wagner –Peyser services provided at the American Job Center include:

Job Applicant Services

- Provide applicant services including job matching, referral to job openings, one on one job search and career exploration conferences and follow-up
- Supportive services including career assessment, labor market information, reemployment services, job search workshops, résumé builder
- résumé reviews, resource area which provides computers, copiers and fax machines, job search resource literature, federal bonding

Online Services

- The Maryland Workforce Exchange (MWE) is online available 24/7 for job/training services, and for business services. For job and training seekers, job openings, virtual recruiter, labor market information, training providers, occupational skills and interest assessments, and more. For businesses recruitment, labor market information, labor law information, equal employment opportunity information, government resources, and businesses incentives, labor relations and more.

Business Services

- Provide business services to include talent recruitment, networking activities, provision of labor market information, tax credit information, labor law information, pre-screening applicant skills, facilitating online testing of applicants, online advertising of recruitments, applicant interview space including full workstations
- Maryland Business Works which provides training funds to increase incumbent workers' productivity, upgrading skills, and creating opportunities for expanding businesses' existing workforce
- Talent acquisition of transitioning ex-offenders

Unemployment Insurance Services

- Provide basic instruction on how to apply for unemployment insurance online or by telephone for an initial claim. Job Seeker and business services are provided to unemployment insurance claimants as their agent.

Partner Services

- Ongoing partner cross training on the Maryland Workforce Exchange. Job Seeker and business services are provided to our partner customers. Partners are trained on MWE Activity History/Service Plan page to allow them to follow up on their customers' activity history and service plan with MD Labor.

Trade Act of 1974, Title II, Chapter 2, as amended

- Advise each worker who applies for unemployment insurance of all the benefits available under Trade and the procedures and deadlines for applying for such benefits
- Facilitate the early filing of petitions for any workers that are likely to be eligible for benefits under the Trade Act
- Advise each adversely affected worker to apply for training before, or at the same time, the worker applies for trade readjustment allowances
- Perform outreach to affected workers, intake of, and orientation for adversely affected workers and adversely affected incumbent workers covered by a certification

- Employment and case management services (To include: Trade application in the Maryland Workforce Exchange, individual employment plan, labor market information, follow up activities, bench marks, etc.)
- Rapid Response activities

WIOA Title 1 staff offer informal referrals to customers with information about the agency to which they are being referred. Cross-training efforts have concentrated on strengthening front-line staff knowledge of other agency's services. Individual agency representatives may track, follow up or document the referral; however, no formal process currently exists for the system. The most restrictive hurdles to finalizing a system-wide referral process (including documentation for the result) are 1) protection of PII and allowability of data sharing and 2) technology. An AJC Navigator position was created to not only assist customers in identifying their needs but also by providing a "warm" handoff referral.

(B) A description of how the Local Board will ensure that migrant and seasonal farm workers in its Local Area will be provided employment services. DWDAL's policy on migrant and seasonal farmworker services can be found here: http://www.labor.maryland.gov/employment/mpi/mpi4-18.pdf

Migrant and seasonal farm workers are served by two programs in the local area.

The Title I MSFW Program (WIOA Section 167) authorizes the National Farmworker Jobs Program, which is currently operated by Telamon Corporation.

- Provides all WIOA Title I Basic Career Services, Individualized Career Services and Training Services as well as post-exit follow-up services to eligible Adult and Youth Migrant and Seasonal Farmworkers and/or dependents of eligible Migrant and Seasonal Farmworkers in a culturally and linguistically-sensitive client-centered approach.
- Outreaches throughout the negotiated service area to identify potentially eligible MSFW's or their dependents.
- Provides Business Services aligned with meeting the needs of WIOA Section 167.

- Provides allowable related assistance including emergency assistance, English as a Second Language, and Workplace Safety Training to eligible Migrant and Seasonal Farmworkers and/or dependents of eligible Migrant and Seasonal Farmworkers.

Title III Wagner-Peyser staff works closely with Telamon to outreach to migrant seasonal farmworkers on location. Staff and collateral materials are made available at the outreach activities to assist with employment services.

Title III MSFW services through Wagner-Peyser are:

- Ensure that the services provided to Migrant Seasonal Farmworkers (MSFWs) are "qualitatively equivalent and quantitatively proportionate" to the services provided to other jobseekers. This means that MSFWs should receive all workforce development services, benefits and protections on an equitable and non-discriminatory basis (i.e. career guidance, testing, job development, training, and job referral). Ensuring equitable services for farmworkers. Managing the Employment Service (ES) and Employment-related Law Complaint System (Complaint System)
- Implementing and sustaining a Farmworker Outreach Program
- Providing Farmworkers notification of available ES services and workers' rights
- Facilitating the Agricultural Job Order Clearance Process
- Sustaining the Monitor Advocate System
- Collecting information about farmworker needs, characteristics, and concerns to improve the provision of services to farmworkers;
- Collaborating with a broad range of stakeholders, including community- and employer-based organizations;
- Ensuring that farmworkers are serviced equitably through the American Job Centers;
- Producing annual service assessments and analyses to promote a better understanding of services to farmworkers and to highlight special efforts and accomplishments by states in serving them; and,
- Ensuring that all legal protections are afforded to farmworkers and that their complaints are promptly resolved.

(C) A description of who is responsible for conducting migrant and seasonal farmworker housing inspections. DWDAL's policy on migrant and seasonal farmworker services can be found here: http://www.labor.maryland.gov/employment/mpi/mpi4-18.pdf

MD Labor conducts housing inspections for Migrant and Seasonal Farmworkers in accordance with MPI 2018-04. A Wagner-Peyser staff person is identified as the individual responsible for inspections. Those farmers/labor contractors that complete ETA 790 and are awarded a contract by US-DOL to work in Maryland must provide housing for the MSFW status workers [i.e. those that cannot reasonably return to their permanent residence after the workday is complete]. On the lower shore, these facilities include motels, rental properties, farm owned housing, and the labor camp in Westover, MD. When the WP designee receives ETA 790 form and associated documents, and determines that inspections are required, s/he contacts the farmer/labor contractor/property owner and schedules the inspection. Notification is provided that a water test must be performed, the fire marshal's office needs to inspect the property, and a first aid certification needs to be obtained. Once the WP designated staff person has inspected the facility the ETA 338 housing inspection form is completed, a copy provided to the responsible individual, and all material to submitted to MSFW administration.

SECTION 8: TITLE IV - VOCATIONAL REHABILITATION FUNCTIONS

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

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

- Provide intake, orientation, and assessments for disabled job-seekers;
- 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 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 services 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 Services Representatives;
- Work in a collaborative manner to coordinate services among the Workforce Partners for youth and adults with disabilities.

(B) A description of how individuals with disabilities will be served through the American Job Center system in the Local Area. MD Labor's Nondiscrimination Plan can be found here: http://www.labor.maryland.gov/employment/ndp/

The Lower Shore AJC strives to ensure that all information and services provided are accessible, regardless of the individual's disability.

- An ADA-compliant computer station is available in the American Job Center. The station is centrally located and includes equipment and software designed to assist users who have mobility impairment or limited vision. Equipment includes an adjustable table, large print keyboard, Trackball, and noise cancelling headphones. Software includes two screen magnifier applications as well as two screen reader applications.
- An iPad is equipped with a sign-language interpretation app which connects to a live interpreter. It is located at the front desk and front desk staff have been trained how to use the device to assist those visitors who communicate using sign language.

SECTION 9: TEMPORARY ASSISTANCE FOR NEEDY FAMILIES FUNCTIONS

(A) A description of how TANF is integrated in the AJC system (e.g., customer intake, service coordination, client monitoring and tracking, targeting employment services to low-skill, low-wage workers, etc.).

Temporary Assistance for Needy Families (TANF) in the state of Maryland is provided through the Temporary Cash Assistance (TCA) benefit by local Departments of Social Services (DSS). There are three local Departments of Social Services in the Local Workforce Development Area: Somerset County DSS in Princess Anne, Wicomico County DSS in Salisbury, and Worcester County DSS in Snow Hill.

The Wicomico County DSS TANF office is co-located at the comprehensive AJC. A benefit of co-location is that it allows for greater ease in referring clients to partner agencies. TANF customers are referred to all AJC opportunities. Customers complete the Online Work Readiness Assessment (OWRA) which identifies barriers, interests and skills. This assessment is used to create the employment development plans with each customer to resolve barriers to employment and engage in work program activities. TANF customer must register with MWE and are instructed to utilize MD Labor services such as resume writing, O'NET and targeted job searching. Customers interested in training are referred to Title I. All TANF recipients are monitored and tracked weekly to ensure they meet their work participation requirement and follow through with referrals.

(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;**

  While there are three counties in the Local Workforce Development Area, the Comprehensive American Job Center is located in Wicomico County. Wicomico County Department of Social Services is co-located at the AJC and has been since 2002. Wicomico DSS staff may provide intake to a resident of any county in Maryland.

  DSS staff in all three counties participate in the AJC Partners' Group which meets quarterly and regularly attend Workforce Development Board meetings. Currently, the Director of Wicomico County DSS serves as a member.

- **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;**

  Wicomico County funds and staffs a drop-in daycare at the American Job Center which provides child care for all AJC customers participating in any on-site activity.

  Somerset County provides in-kind space at the Princess Anne location for the affiliate AJC site. Also in this partnership, MD Labor provides equipment and staff oversite and LSWA provides wages for two part time employees.

  All three departments participate in the MOU and RSA.

- **Cross train and provide technical assistance to all WIOA Partners about TANF;**

  Cross-training and technical assistance strategies amongst all partners is a priority of the AJC Partners' Group. The goal is to engage in a minimum of two cross-training events per year. This allows for staff to be well-educated on partner services so that meaningful referrals can be made. DSS staff always participate in these events.

- **Ensure that activities are countable and tracked for the TANF Work Participation Rate (WPR);**
  As a part of the cross-training outlined above, an understanding of the performance measures for each partner will be established. Strategies will be developed to align WIOA activities with TANF performance measures.

  DSS staff will ensure customers are enrolled in meaningful and countable activities. All TCA recipients will be engaged in activity/activities during the application process. Customers must remain in a countable activity until they become employed or no longer receive TCA. All customer activities and job placements are entered and tracked in WORKS. Compliance is monitored weekly.

- **Access to business services and employer initiatives to attract and better serve employers by marketing joint services, minimizing the burden on employers who use the centers, and provide employer-focused services through a single point of entry rather than through all partnering programs; and**
  TANF staff actively participates on the Business Services Team. In addition, Wicomico DSS's Regional Job Developer has created a weekly newsletter which shares employment and training opportunities with internal and external partners.

- **Contribute and provide outcomes data to the WIOA system through strategies for collecting and reporting varied program reporting requirements.**
  Maryland Workforce Exchange (MWE) is the current WIOA tracking database. TANF does not use MWE for case management/tracking. Read only access is available to partner staff. Access allows case managers to track and monitor individual customers who enroll in WIOA activities and review employment placements.

  Data sharing continues to be a challenge in working across funding sources/programs.

(C) A description of the LDSS representation on the Local Board to ensure that TANF expectations, roles, and responsibilities are addresses in the Local Area.

The Wicomico County DSS Director serves on the LWDB. In general, non-business members of the Workforce Development Board are appointed for four-year terms. While there are three departments in the local area, only one director will be a voting member of the board at a time. Non-member directors are invited to attend the quarterly meetings.

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

TANF recipients are made aware of and have access to AJC partner programs throughout the duration of their involvement with DSS. Examples included being required to register in MWE, providing referrals, and discussing AJC services during orientations and workshops.

SECTION 10: COMMUNITY SERVICES BLOCK GRANT FUNCTIONS

(A) A list of Community Services Block Grant (CSBG) providers in the Local Area and whether they provide employment and training activities. Community Action Agencies are a partner in the local workforce development system, irrespective of whether they spend money on employment and training. A map of Maryland's Community Action Agencies (CAAs) can be found here: http://www.maryland-cap.org/member-map.aspx

The Community Services Block Grant agency in the local area provides employment and training services.

SHORE UP! Inc.

520 Snow Hill Road

Salisbury, MD 21804

Local Phone: 410-749-1142

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

- **Potential co-location of Community Action Agencies (CAAs) and/or WIOA Partners at American Job Centers or CAAs depending on the nature of local partnerships and operations;**
  The AJC and SHORE UP! are not co-located. Informal referrals are made between the AJC and SHORE UP!. Information about SHORE UP! services is available in the AJC welcome center, on the video screen, on the website and at the front desk.
- **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;**
  SHORE UP! is a participant in the lower shore MOU and RSA.

- **Cross train and provide technical assistance to all WIOA Partners about CSBG;**
  SHORE UP! is invited to participate in all AJC partnership cross-training events.
- **Ensure that activities are countable and tracked for CSBG performance metrics;**
  The topic of partner performance metrics is the next cross-training subject. As with all partner events, SHORE UP! will be invited to participate.
- **Access to business services and employer initiatives to attract and better serve employers by marketing joint services, minimizing the burden on employers who use the centers, and provide employer-focused services through a single point of entry rather than through all partnering programs; and**
  SHORE UP! is invited to attend quarterly partners' and business services meeting where these topics are addressed.
- **Contribute and provide baseline outcomes data to the WIOA system through strategies for collecting and reporting varied program reporting requirements.**
  Data sharing concerns continue to be a barrier for all partners.

(C) A description of the CAA representation on the Local Board to ensure that CSBG expectations, roles, and responsibilities are addressed in the Local Area. A representative from a CAA is a required partner on the Local Board. The GWDB's Local Board certification policy can be found here: http://www.gwdb.maryland.gov/policy/lwdbcert.doc

The Executive Director of SHORE UP!, Inc. is a member of the local board.

SECTION 11: JOBS FOR VETERANS STATE GRANTS FUNCTIONS

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

The American Job Center (AJC) provides "Priority of Service" to veterans and their eligible spouses in accordance with the Jobs for Veterans Act of 2002 and the Veterans Benefits, Health Care, and Information Technology Act of 2006. The purpose of 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 federal Department of Labor training, employment, or placement service in any workforce preparation program. Local Workforce Development Areas will ensure all vendors follow Priority of Service provisions.

To receive Veterans Priority of Service for a specific program, a Veteran or eligible spouse must meet the statutory definition of a "covered person" and also must meet any other statutory eligibility requirement applicable to the program. For all USDOL funded programs, Priority of Service means access to services or resources earlier than others, or if resources are limited, it may mean access to services and resources instead of general service individuals.

Veterans Priority of Service will take precedence before applying WIOA Priority of Service for recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. Programs with specific eligibility criteria, such as the WIOA Title I Adult program, will ensure covered persons meet all statutory eligibility requirements for the program before receiving Priority of Service.

Note: All criteria for veteran and spouse eligibility will be applied as written in Maryland's WIOA State Plan, Section 9.

In accordance with Maryland's State Plan, veterans and eligible spouses will continue to receive priority of service for all USDOL-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:

First Priority	*Veterans and eligible spouses (as defined in the Jobs for Veterans Act, 38 USC 4215(a)) who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient*
Second Priority	*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*
Third Priority	*Veterans and eligible spouses who are not included in WIOA's priority groups*
Fourth Priority	*priority populations established by the Governor and/or Local WDB.*
Fifth Priority	*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 AJC staff who work at the front desks are trained to determine whether any customers are veterans. Information can also be gathered on veteran status when the AJC front desk has customers complete their county's "Customer Activity Sheet". 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 MD Labor's Significant Barrier to Employment (SBE) Checklist to determine whether the veteran qualifies as having one or more 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 them to meet with a Disabled Veteran Outreach Program (DVOP) Specialist.

2. If the customer does *not* require intensive services, they are 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.

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 their 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 quality 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 they 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.

Jobs for Veterans State Grant (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 USDOL 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.

Local Veterans Employment Representatives (LVER) conduct outreach to employers and engage in advocacy efforts with hiring executives to increase employment opportunities for veterans and encourage the hiring of veterans.

The Lower Shore has one Local Veterans' Employment Representative (LVER) located within the Comprehensive AJC and who serves the tri-county area. The LVER actively participates in the Lower Shore Business Services Team by attending meetings, sharing information and resources, and updating the group on local veteran's employment activities. Lower Shore Business Services Team meetings are the primary means of sharing information about serving employers in the area; the LVER is an integral part of the group.

SECTION 12: TRADE ADJUSTMENT ASSISTANCE FOR WORKERS PROGRAM FUNCTIONS

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

State merit staff provide the following TAA services:

- Advise each worker who applies for unemployment insurance of all the benefits available under Trade and the procedures and deadlines for applying for such benefits;
- Facilitate the early filing of petitions for any workers that are likely to be eligible for benefits under the Trade Act;
- Advise each adversely affected worker to apply for Trade Readjustment Allowances (TRA) prior to applying for training, unless they have no intention of receiving TRA benefits while in training
- Perform outreach to affected workers, intake of, and orientation for adversely affected workers and adversely affected incumbent workers covered by a certification;
- Employment and case management services (To include: Trade application in the Maryland Workforce Exchange, individual employment plan, labor market information, follow up activities, bench marks, etc.);
- Rapid Response activities. AJC Partners participate as appropriate during Trade Rapid Response events.

(B) A description of how Title I staff will provide the TAA services listed above in an integrated manner. (Note: Services such as initial assessments, access to information on workshops, job search activities, inform participant of all the services and allowances available under TAA, Rapid Response, LMI, assist in securing appropriate training, monitor training progress and benchmarks, IEP, obtain credentials, follow-up, etc. may be provided by a partner program. Decisions such as the affected worker's TAA training program and training contracts need approval by state merit staff). Describe what your process/flow will look like.

Partner staff in the American Job Center will be responsible for providing the initial meeting and assessments, ensure enrollment in MWE, labor market information and delivering Rapid Response service, if not already provided and to make the participants aware of all the available services and allowances that the Trade Adjustment Assistance Program can provide. Trade staff will work with the trade affected worker on training options, completing TAA application MWE and to ensure the six criteria for training have been met, as well as create or review participants' IEP. Trade staff will also provide approval of all TAA training programs, training contracts and training waivers. Efforts will be coordinated to monitor progress, provide Bench marks every 60 days and ensure a service is provided every 90 days for the Trade affected worker, as well as ensure any needs and barriers are addressed. Staff will coordinate on all employment, case management and follow-up activities.

(C) A description of how Trade participants will be co-enrolled in other programs. Note: co-enrollment with WIOA Title I Dislocated Worker program is a requirement under the TAA Final Rule.

Through the strong partnership in the local area, participants must be co-enrolled with other programs after referral. Co-enrollment in the Dislocated Worker program occurs when it directly benefits the individual. TAA Final Rule at 20 CFR 618.325(a)(1) requires states to co- enroll trade-affected workers with the WIOA DW program, if the worker is eligible. However, states cannot deny such workers benefits or services under the TAA Program solely because such worker declined to be co-enrolled.

SECTION 13: UNEMPLOYMENT INSURANCE FUNCTIONS

(A) A description of how WIOA Title I and Title III partners will support Unemployment Insurance claimants and provide meaningful assistance to Unemployment Insurance claimants, as required by WIOA.

Unemployment Insurance Program Letter (UIPL) No. 14-18 states that:

> *In the context of providing assistance to UI claimants, "meaningful assistance" means having staff that are well-trained in UI claims filing and claimant rights and responsibilities, available in American Job Centers. These staff members provide UI claim-filing assistance, if requested or if the individual is identified as needing services due to barriers such as limited English proficiency, disabilities, or other barriers. The staff providing this assistance may be UI, Wagner-Peyser, or other American Job Center staff that have been properly trained to provide this type of assistance and service to assist in claims taking by facilitating routine acceptance of information.*

In order to ensure that UI claimants receive "meaningful assistance" in the AJC, AJC staff provides an informational flyer with basic instruction on how to apply for unemployment insurance online or by telephone for an initial claim. Job Seeker and business services are provided to unemployment insurance claimants through the RESEA and ROW workshops.

Additionally, Wagner-Peyser staff regularly administers two separate workshops for Unemployment Insurance recipients.

1. The Reemployment Services and Eligibility Assessment (RESEA) Program was developed by the US Department of Labor in an effort to reduce the number of weeks that UI claimants receive benefits, by assisting them in quickly returning to the workforce. The RESEA Program is designed to help claimants to identify potential barriers to employment and assesses work search progress. It also includes an eligibility review, which in turn helps the MD Labor Division of Unemployment Insurance to identify claimants that may be out of compliance with basic UI laws and policies regarding ability and availability to work, school attendance, and active work search.

2. The Reemployment Opportunities Workshop (ROW) Program is a full-day workshop offered to certain UI claimants to shorten the duration of UI benefits received through reemployment efforts.

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

Participants of both RESEA and ROW workshops receive information about AJC services, including Title I Adult and Dislocated Worker training services during the workshops.

SECTION 14: SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM FUNCTIONS

(A) A list of Senior Community Service Employment Program providers in the Local Area. Explain how SCSEP is administered in the Local Area, including grantee and sub-grantee information, if applicable.

Funding for the Senior Community Service Employment Program is provided by the Center for Workforce Inclusion
8403 Colesville Rd.
Silver Spring, MD 20910
Phone: 301-578-8932
Website: www.seniorserviceamerica.org

Senior Community Service Employment Program is provided in Somerset, Wicomico, and Worcester Counties by:
MAC, Inc., Area Agency on Aging
909 Progress Circle, Suite 100
Salisbury, MD 21804
Phone: 410-742-0505
Website: www.macinc.org

(B) A description of how Senior Community Service Employment Program services will be provided in the American Job Center system within the Local Area. Include the components of the SCSEP program that are offered in the Local Area.

As with all local partners, the AJC provides a technological access point to MAC services. Information is available at the comprehensive center and applicants may be connected to and from MAC via referral. MAC does not directly provide services within the physical AJC.

MAC, Inc., Area Agency on Aging

- Provides Employment and Training Programs for the older Most In Need job seeker
- Provides Outreach, Intake, and Orientation

- Provides Opportunities for eligible participants to learn, work, and serve others
- Provides Case Management and Supportive Services to participants in training programs
- Refers Participants to the WIOA system partners as appropriate

SECTION 15: WIOA SECTION 188 AND EQUAL OPPORTUNITY FUNCTIONS

MD Labor's Nondiscrimination Plan can be found here: http://www.labor.maryland.gov/employment/ndp/. MD Labor's Language Access Plan can be found here: http://www.labor.maryland.gov/employment/wioa-access.pdf

It is against the law for this recipient of federal financial assistance to discriminate on the following bases: Against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I-financially assisted program or activity.

(A) A designation of the local Equal Opportunity Officer, including their name, location, email, telephone number and TTY or equivalent.

The local Equal Opportunity Officer is:

Ms. Dione Shaw, Operations Coordinator
Lower Shore Workforce Alliance
31901 Tri-County Way Suite 215
Salisbury, MD 21804
Phone: 410-341-3835
TTY: Users call via Maryland Relay Service 7-1-1
Email: dshaw@lswa.org

(B) A description of how entities within the American Job Center delivery system, including American Job Center operators and the American Job Center partners, will comply with Section 188 of WIOA and 29CFR Part 39 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 and individuals with Limited English Proficiency, including providing staff training and support for addressing the needs of individuals with disabilities and for individuals with Limited English Proficiency.

The building is fully accessible as it was renovated in 2012 with accessibility as a priority.

DORS has generously provided an ADA-compliant computer station for use in the American Job Center. The station is centrally located and includes equipment and software designed to assist users who have mobility impairment or limited vision. Equipment includes an adjustable table, large print keyboard, Trackball, and noise cancelling headphones. Software includes two screen magnifier applications as well as two screen reader applications. Designated staff have been trained by a DORS representative.

An iPad is equipped with a sign-language interpretation application, which connects to a live interpreter. It is located at the front desk and front desk staff have been trained how to use the device to assist those visitors who communicate using sign language.

Telamon Corporation, a strong partner co-located in the Comprehensive AJC, employs a number of multi-lingual staff who are available to assist limited-English speakers with their needs in the AJC. Interpretation is generally available in Spanish and Haitian-Creole. Telamon staff also routinely translates printed collateral. Posters for Language Line Solutions are visible in the AJC reception area. The Lower Shore Workforce Alliance maintains an account with Language Line Solutions for use of front desk staff.

(C) An acknowledgment that the Local Board understands that, while Section 188 of WIOA and 29 CFR Part 39 ensure equal opportunity for individuals with disabilities, sub-recipients may also be subject to the requirements of-

- **Section 504 of the Rehabilitation Act, which prohibits discrimination against individuals with disabilities by recipients of Federal financial assistance;**
- **Title I of the ADA, which prohibits discrimination in employment based on disability;**
- **Title II of the ADA, which prohibits State and local governments from discriminating on the basis of disability;**
- **Section 427 of the General Education Provisions Act; and**
- **Maryland Anti-Discrimination laws including 5 Md. STATE GOVERNMENT Code Ann. §10-1101, whch stipulates that oral language services must be delivered on-site for those in frequent contact with a service provider.**

The Workforce Development Board acknowledges that, while Section 188 of WIOA and 29 CFR Part 38 ensure equal opportunity for individuals with disabilities, sub-recipients may also be subject to the requirements of: Section 504 of the Rehabilitation Act, which prohibits discrimination against individuals with disabilities by recipients of Federal financial assistance; Title I of the ADA, which prohibits discrimination in employment based on disability; Title II of the ADA, which prohibits State and local governments from discriminating on the basis of disability; Section 427 of the General Education Provisions Act; and Maryland Anti-Discrimination laws.

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

To ensure that AJC services are accessible to all individuals including those with limited English proficiency (LEP), the following steps have been taken:

- The LSWA Operations Coordinator and AJC Facility Coordinator attended LEP training hosted by MD Labor on March 4, 2016 regarding compliance with meaningful access requirements. Staff will continue to participate in training made available through MD Labor.
- Telamon Corporation, a strong partner co-located in the Comprehensive AJC, employs a number of multi-lingual staff who are available to assist limited-English speakers with their needs in the AJC. Interpretation is generally available in Spanish and Haitian-Creole. Telamon staff also routinely translates printed collateral.
- Front Desk staff have access to an iPad containing Google Translate translation software
- Posters for Language Line Solutions are visible in the AJC reception area. The Lower Shore Workforce Alliance maintains an account with Language Line Solutions for use of front desk staff.
- Other accounts available through Maryland state agencies are:
    - Telephone Interpretation: Language Line Services, 1-800-752-6096 , BPO 050B2400001
    - On-Site Interpretation: Ad Astra, 1-800-308-4807, BPO 050B3400003
    - Written Translation: Schreiber Translations, Inc, BPO 050B3400002

Individuals with disabilities visiting the AJC enter a fully accessible building with accommodations available ensuring access to services.

(E) A description of the Local Board's procedures for handling grievances and complaints from participants and other interested parties affected by the local American Job Center system, including partners and service providers. Federal regulation on grievances and complaints can be found at: 29 CFR 38.69-97. 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;**
  LSWA's complaint procedure is attached (Attachment B).
- **Complaints and grievances not alleging illegal forms of discrimination. This includes grievances from individuals alleging labor standards violations.**
  Complaints will be investigated and appropriate action taken.
- **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.**

  Until the partnership drafts a process, Tri-County Council, Lower Shore Workforce Alliance and the Workforce Development Board will follow all the guidelines established in the TCC Policy and Procedures Manual.

(F) A description of how an individual can request an accommodation.

An individual in need of an accommodation to access Title I services may make a request of any LSWA team member. The team member will immediately contact the EO officer or Deputy Director to process the request.

a. The request can be in writing or verbal.
b. A Reasonable Accommodation Request Form will be completed with the assistance of the staff designee (for record keeping purposes).
c. Although the reasonable accommodation requested by the participant may not be granted, the chosen accommodation must be effective.
d. Undue hardships are reviewed on a case-by-case basis as listed in 29 CFR 38.4 (rrr) (1)(ii).
e. All reasonable accommodation decisions will be communicated in writing to the requestor. If an individual's reasonable accommodation is denied but offered a different accommodation in its place, LSWA will explain the reason for the denial of the requested accommodation and the reason that it believes that the chosen accommodation will be effective.
f. LSWA will communicate in writing to the individual that he/she has a right to file an Equal Employment Opportunity Complaint with the Civil Rights Center (CRC), U.S. Department of Labor 200 Constitution Avenue, NW, Room N-4123, Washington, DC 20210.

(G) A description of the Local Board's policy and procedures with regard to aid, benefits, services, training, and employment, include a statement of assurance that you will provide reasonable accommodation to qualified individuals with disabilities unless providing the accommodation would cause undue hardship.

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

(H) A description of how the Local Board will comply with the Americans with Disabilities Act. The description should include how the Local Board will provide reasonable accommodations regarding materials, technology, and physical and programmatic accessibility of facilities. The description should also include how the Local Board will provide staff training and support for addressing the needs of individuals with disabilities. The Americans with Disabilities Act Checklist for Existing Facilities can be found here: http://www.labor.maryland.gov/employment/ndp/nbp9-AADAChecklist.pdf

The building is fully accessible as it was renovated in 2012 with accessibility as a priority.

DORS has generously provided an ADA-compliant computer station for use in the American Job Center. The new station is centrally located and includes equipment and software designed to assist users who have mobility impairment or limited vision. Equipment includes an adjustable table, large print keyboard, Trackball, and noise cancelling headphones. Software includes two screen magnifier applications as well as two screen reader applications.

An iPad is equipped with a sign-language interpretation app which connects to a live interpreter. It is located at the front desk and front desk staff have been trained how to use the device to assist those visitors who communicate using sign language.

Staff have attended multiple training sessions regarding providing services to individuals with disabilities and will continue to do so as available.

(I) 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.

WIOA Title I is an equal opportunity program. It is the policy of the Lower Shore Workforce Alliance that no person shall be subjected to discrimination on the grounds of race, color, gender, religion, national origin, sexual orientation, age, marital or parental status, or disability.

Auxiliary aids and services are available upon request to individuals with disabilities. If you need special accommodations to participate in the program, please call 410-341-6515. TTY Users call via Maryland Relay Service 7-1-1

The AJC Assistive Technology Procedure is included as Attachment D.

(J) 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, including using oral interpretation and written translation services in accordance with Maryland Anti-Discrimination laws, including 5 Md. STATE GOVERNMENT Code Ann. §10-1101, which stipulates that oral language services must be delivered on-site for those in frequent contact with a service provider.

- Telamon Corporation, a strong partner co-located in the Comprehensive AJC, employs a number of multi-lingual staff who are available to assist non-English speakers with their needs in the AJC. Interpretation is generally available in Spanish and Haitian-Creole. Telamon staff also routinely translate printed collateral.
- Posters for Language Line Solutions are visible in the AJC reception area. The Lower Shore Workforce Alliance maintains an account with Language Line Solutions for use of front desk staff.
- Other accounts available through Maryland state agencies are:
    - Telephone Interpretation: Language Line Services, 1-800-752-6096, BPO 050B2400001
    - On-Site Interpretation: Ad Astra, 1-800-308-4807, BPO 050B3400003
    - Written Translation: Schreiber Translations, Inc, BPO 050B3400002

SECTION 16: FISCAL, PERFORMANCE AND OTHER FUNCTIONS

(A) An identification of the entity responsible for the disbursal 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).

The Tri-County Council for the Lower Eastern Shore of Maryland (TCC) serves as the grant recipient, fiscal agent and administrative entity for local WIOA funds.

(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 dependence of all WIOA Partners on the federal budget process, federal budget funding levels and allocation methodologies results in a level of risk for the sustainability of the American Job Center. The Tri-County Council is leveraging funds towards the AJC operations costs and AJC partners are contributing in-kind resources.

The allocation formula(s), implemented by the Governor, is a driving factor in the sustainability of the American Job Center(s) in that the formula allocates funding based on local economic conditions.

LSWA will evaluate the sustainability of the AJC (s) on an annual basis and determine if adjustments need to be made. The evaluation will include an analysis of factors including but not limited to: reduction in days of services, reduction in lease costs, reallocation of costs among AJC Partners and collocation with other entities to reduce costs, closing satellite locations and soliciting funds from state, local or private sources.

(C) A description of the competitive process to be used to award the sub-grants and contracts in the Local Area for activities carried out under this title, including risk assessment of potential sub-grantees and contractors.

Competitive Process

Tri-County Council procurement procedures comply with Federal and Maryland regulations. In general, the amount of sub-grant awards are procured by Request for Proposal (RFP) method. More information may be found in Section 16(J)

Risk assessment

Risk assessment procedures include:

- Conduct onsite visit (fiscal and program staff);
- Complete internal questionnaire during visit;
- Review independent audit reports and check the Federal Audit Clearinghouse for each potential vendor;
- Check epls.gov for suspension and/or debarment;
- A risk report is written, and a risk matrix completed.

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

The Workforce Development Board will begin by reviewing membership and existing goals. After identification of any changes needed, the board will decide on a plan of action to continue its capacity as a high-performing board.

Customer satisfaction surveys regarding the AJC are conducted on a regular basis. Additionally, individual agencies conduct their own surveys. Customer satisfaction surveys are also available on kiosks at the AJC main exits.

The One-Stop Operator will be monitored in the fall of 2021 by the LSWA Director, who will report to the WDB as directed by the WDB. The review will be taken as per standard monitoring procedures if necessary.

(E) A description, including a copy of, of the Local Area's Individual Training Account policy. The description should include information such as selection process, dollar limits, duration, etc and must be in accordance with the State's WIOA Title I Training and the Eligible Training Provider List policy found at: http://www.labor.maryland.gov/employment/mpi/mpi9-17.pdf

The ITA Policy was approved at the March 14, 2018 WDB meeting:

Purpose

To outline the policy for the use of Individual Training Accounts for Adult and Dislocated Worker training services.

Policy

The primary method by which Adult and Dislocated Workers enter occupational skills training programs is through an Individual Training Account (ITA), which is used to arrange payment for the training services. ITAs must be directly related to the individual goals established between the participant and the case manager.

Training Availability

ITAs will be funded only for training programs which appear on the Eligible Training Provider List (ETPL). This list is maintained by the MD Labor and can be found online.

Limitations

The maximum dollar amount of training funded through an ITA is $8,900.

The maximum time period for an ITA cannot exceed the period of the selected training program. In particular, credit students must attend full time and follow the course catalog for their program of study. Satisfactory academic progress as defined by the training institution is required for continued funding.

Items not eligible for funding include:

- *Individual classes that are not required for completion of the program;*
- *The cost of repeating a failed class without prior written approval;*
- *Classes taken "out of order" without prior written approval.*

Customer Choice

Individuals may select any provider approved on the Eligible Training Provider List (ETPL). In order to maximize the benefit to the individual and to control costs, any requests for funding a program of study outside of the lower shore geographical area must be made in writing and be approved by the director or designee. Costs of attending a school outside of the geographic area (ie mileage, lodging, meals, etc) will not be covered.

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

Training services are provided by ITA; no "contract for services" method is currently in use. ITAs are approved for in-demand occupations and for courses which appear on the ETPL.

In order to ensure informed consumer choice, the training information flyer includes statements regarding 1) searching the ETPL for additional trainings and 2) contacting each school for course information.

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

Self-registration: All jobseekers register in MWE prior to receiving employment or training services.
Case Management: Wagner-Peyser, TAA, and Title I Adult, Dislocated Worker and Youth case management is required to be recorded in MWE.
Partner Access: WIOA partners not using MWE as their primary data management system can request read-only access to MWE. Until such time that the state agencies can execute an agreement on a single data system, the fact that all partners do not use one system will continue to be a barrier to full collaboration.

(H) A description of the Local Board's procedures for conducting oversight and monitoring of its WIOA activities and those of its sub-grantee and contractors. DWDAL's policy on monitoring can be found here:
http://www.labor.maryland.gov/employment/mpi/mpi7-19.pdf
The monitoring plan shall address the monitoring scope and frequency and shall include the following-

LSWA staff conducts programmatic monitoring of sub-grantees. At this time, only Youth programs are sub-granted.

- **The roles and responsibility of staff in facilitating this procedure;**
  The Youth Program Manager schedules and conducts program monitoring. The Staff Accountant schedules and conducts fiscal monitoring.
- **A requirement that all sub-grantee agreements and contracts be monitored at least annually;**
  Program monitoring: Youth programs are formally monitored once per program year, however additional informal reviews are conducted as needed.

Fiscal monitoring: 1) on-site visit to prepare risk assessment; 2) monitoring and review throughout the grant of requisitions for reimbursement; 3) close-out site visit for end of grant review of accounting practices and review source documentation.

- **Procedures for determining that expenditures have been made against the cost categories and within the cost limitations specified in the Act and WIOA regulations;**
  Each requisition for payment is reviewed for allowance of the expenditures by the Youth Program Manager before the request for payment is submitted. The Workforce Director reviews the expenditures a second time before approving the request for submission to the fiscal department for payment.

  Once submitted to the fiscal department, the Staff Accountant reviews requisition and backup documentation for the allowance of the expenditures and approves the request for payment.

- **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 sub-grantees and contractors;**
  Compliance with WIOA, Department of Labor Training and Employment Guidance Letters, and Maryland Policy Issuances is reviewed during the programmatic monitoring visit.

  Fiscal monitoring of sub-grantee programs relies on regulations provided in 2 CFR 200.

- **Monitoring risk factors and risk assessments;**
  A risk assessment is completed with an emphasis on internal controls (separation of duties), an examination of financial statements/the most recent audit, and an accounting systems review to ensure that awarded grant funds are properly managed and separated from other funding sources. From this, a written report is generated indicating where gaps or deficiencies exist as well as recommendations for improvement.

- **Provisions for the recording of findings made by the recipients' monitor(s), the forwarding of such findings to the sub-grantee or contractor for response and the recording of all corrective actions;**

A written report is submitted to the sub-recipient, usually within thirty days of the visit. Findings are taken seriously and corrective action parameters given for resolution. Required steps and a timeline are provided in the report.

Fiscal monitoring findings are forwarded in writing to program staff for resolution.

- **Provisions of technical assistance as necessary and appropriate; and**
  Technical assistance is available upon request or upon determination by LSWA staff that the sub-recipient is in need of assistance.
- **Specific local policies developed by the Local Board for oversight of the American Job Center system, youth activities and employment and training activities under Title I of WIOA.**
  The following polices have been developed and approved as part of the implementation of WIOA.

Assessment	March 14, 2018
Dislocated Worker Eligibility	September 13, 2017
Follow Up Procedures	March 14, 2018
ITAs	March 14, 2018
Out-of-School Youth Who Require Additional Assistance	December 13, 2017
Priority of Service	September 8, 2021
Selective Service	March 14, 2018
Self-Sufficiency	June 9, 2021
Supportive Services	March 14, 2018
Work Based Learning	June 9, 2021
Electronic Signature and Virtual Enrollment	September 9, 2020

(I) A description of the Local Board's policy and procedures regarding the safeguarding and handling of personally identifiable and confidential information (ex., physical and electronic files), including the incident response plan for loss of records. DWDAL's policy on privacy and data security can be found here: http://www.labor.maryland.gov/employment/mpi/mpi4-19.pdf

Federal law, OMB Guidance, DOL polices, and MD Labor policies require that personally identifiable information (PII) and other sensitive information be protected.

Tri-County Council's PII policy is attached (Attachment C).

(J) A description of the Local Board's procurement system, including a statement of assurance that the procedures conform to the standards in DOL regulations set forth in 29 CFR Part 95, Part 97 and 2 CFR 200. Note that this should include details on how the Local Board would award emergency contracts when current contracts have been eliminated for just cause, in accordance with the Local Board's procurement system.

As a division of TCC, LSWA follows TCC's procurement policy. The document sets forth the policies used by The Tri-County Council for the Lower Eastern Shore of Maryland (TCC) and the Tri-County Council Foundation (TCCF) to administer federal funds pursuant to *Title 2 of the Code of Federal Regulations (2CFR) Part 200*, which took effect on December 26, 2014. It also includes requirements and references from certain policies and laws pertaining to specific grantee rules and regulations.

The policy contains the internal controls and procurement standards used by the TCC to ensure that all funds are lawfully expended and meet the requirements of federal and state agencies that may assist in the financing activities of TCC.

All TCC procurements will comply with Federal and Maryland state law and the rules and regulations of our supported counties.

The policy reads in part:

OWER SHORE WORKFORCE ALLIANCE (LSWA) / EXECUTIVE DEPARTMENT/ MULTI-PURPOSE CENTER (MPC) / ADMINISTRATION DEPARTMENT / TRI-COUNTY COUNCIL FOUNDATION (TCCF)

The Lower Shore Workforce Alliance (TCC-LSWA), a division of the Tri-County Council, is a sub-recipient of funding from the Maryland Department of Labor (Labor). Tri-County Council's Executive Department is a sub-recipient of funding from the US Department of Commerce and the Maryland Department of Commerce. As such, TCC-LSWA and the Executive Department adhere to the contracting guidance for recipients of Federal funding awarded by the Department of Labor and the Department of Commerce, both of which adopted 2 CFR §200. (2 CFR § 2900.4 and 2 CFR § 1327.101) The Multi-Purpose Center, Administration Department, and TCCF entities (i.e. Project Opportunity, MWA) also conduct procurements under the guidance of 2 CFR §200.

The amount and type of a purchase determines how the purchase will be handled. Divisions of TCC must comply with the most restrictive guidelines of the state and federal agencies that provide funding for the purchase which for TCC-LSWA and the Executive Department, is 2 CFR §200. The policy below is excerpted from 2 CFR §200.

The following procurement thresholds are current as of June 20, 2018 when the OMB issued Memorandum M-18-18. The monetary thresholds are periodically adjusted for inflation.

A. PROCUREMENT THRESHOLDS (2 CFR §200.320)

AMOUNT	***REQUIREMENTS***
Up to $10,000	*Also known as micro-purchases. These may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable. To the extent possible, these must be distributed equitably among qualified suppliers.* *For purchases over $1,000, quotes must be reviewed by the Procurement Officer prior to purchasing. If applicable, these purchases must be recorded as fixed assets by the Finance Department.*

$10,001 to $250,000	*Relatively simple and informal method for securing services, supplies, or other property that do not cost more than the simplified acquisition threshold. Price or rate quotations must be obtained from at least three (3) qualified sources. No price or cost analysis must be done.*
$250,001 +	*Purchases above the Simplified Acquisition Threshold must be procured through the Finance/Procurement department through one of the methods listed below under 'Large Procurements'. TCC's preferred method is via RFP.*

B. LARGE PROCUREMENTS

One of the following purchase methods must be used on purchases greater than the Simplified Acquisition Threshold (currently $250,000) or greater. A cost or price analysis must be performed in connection with any of the procurement methods below.

1. ***Sealed Bids** – Bids are publicly solicited and a firm fixed price contract is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bid, is the lowest in price. This is the preferred method for procuring construction. With this procurement method, price is a major factor. (2 CFR §200.320(c))*
2. ***Competitive Proposals** – Also known as Requests for Proposals (RFPs). With this method, typically, more than one source submits an offer, and either a fixed price or cost-reimbursement type contract is awarded. (2 CFR §200.320(d)) For a more detailed explanation of the RFP process, please see the Procurement Procedure Manual. If this method is used, the following requirements apply:*
    a. *RFPs must be publicized and identify all evaluation factors and their relative importance;*
    b. *Proposals must be solicited from an adequate number of qualified sources;*

c. *TCC must have a written method for conducting technical evaluations of the proposals received and for selecting recipients;*
d. *Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program with price and other factors considered; and*
e. *TCC may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services.*

3. ***Noncompetitive Proposals/Sole Source*** *– Procurement through solicitation of a proposal from only one source (2 CFR §200.320(f)) and may be used only when one or more of the following circumstances apply:*
   a. *The item is available only from a single source;*
   b. *The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;*
   c. *The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or*
   d. *After solicitation of a number of sources, competition is determined inadequate.*

(K) A description of any documentation to demonstrate that the acquisition, management, and disposition of property adhere to the Property Management Procedures taken from DOL regulations 29 CFR Part 97 and 29 CFR Part 95.

TCC has an implemented procurement policy and procedure based on the appropriate federal regulations and guidelines. The policy and procedures are audited annually for compliance with both the federal regulations and the organization's adherence to the policy and procedures.

The Lower Shore Workforce Alliance (LSWA) adheres to the uniform standards governing management and disposition of property furnished by the Federal Government whose cost was charged to a project supported by a Federal award (29 CFR §95.30).

Federally-owned property will be insured if required by the terms and conditions of the award (29 CFR §95.31). LSWA will use the real property for the authorized purpose of the project as long as it is needed and shall not encumber the property without approval of the DOL. If the property is no longer needed, LSWA shall obtain prior written approval from the grant officer for its use in other federally-sponsored projects. When the property is no longer needed, the recipient shall request disposition instructions from the grant officer and will then follow disposition instructions (29 CFR §95.32)

The title to Federally-owned property remains with the Federal Government and recipients shall submit an annual inventory listing any federally owned property in their custody to DOL. If DOL has no further need for the property, it shall be declared excess and reported to the GSA (29 CFR §95.33)

The title to equipment acquired by LSWA with Federal funds shall remain with LSWA. As the recipient, LSWA complies with the equipment use and disposition standards set forth in section 29 CFR §95.34.

The title to supplies and other expendable property shall remain with the LSWA upon acquisition. If there is extra inventory of unused supplies exceeding $5,000 in total upon termination or completion of the project, and the supplies are not needed for any other federally-sponsored program, LSWA shall retain the supplies for use on non-Federal sponsored activities or sell them, but in either case, compensate the Federal Government for its share. Compensation for this is determined in the same manner as for equipment. LSWA shall not use Federally-acquired supplies to provide services to non-Federal organization for a fee that is

less than what private companies charge for equivalent services. (29 CFR §95.35)

LSWA adheres to all intangible property standards as set forth in 29 CFR §95.36 and also complies with the property trust relationship as outlined in 29 CFR §95.37.

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

Each member of the Workforce Development Board is made aware of and signs an acknowledgment of the following policy:

Workforce Development Board – Conflict of Interest

member of the Workforce Development Board (WDB) cannot participate in any board proceeding in which the result would provide direct or indirect benefit of the board member of his or her family. When a board member has a personal or legal status that may be in conflict with the interests of the Lower Shore Workforce Alliance, the WDB Chairperson may ask the board member to leave the room during the discussion and subsequent vote.

Examples of conflict of interest are:

- *Misuse of the prestige of their office for their own economic benefit.*
- *Misuse of confidential information acquired in their official position for their economic benefit or that of another.*
- *Representation of any party for a contingent fee or gift before the WDB.*
- *Participation as an agent on behalf of the WDB in any matter which, to their knowledge, would have a direct financial impact on them, their spouses or dependent children, or any entity with which they are affiliated, as distinguished from financial impact on the public generally.*
- *Holding or acquiring of any substantial interest in an entity that has or is negotiating a contract with the WDB.*

- *Employment by an entity that has or is negotiating a contract under discussion with the WDB.*
- *Solicitation of any gifts or acceptance of any gifts of a value greater than $25 from any person or firm that has or is negotiating a contract with the WDB. For purposes of this section, "gift" includes the transfer of anything of economic value, regardless of form, without adequate and lawful consideration.*

When the board is involved in awarding a contract, a board member declares when he or she has a possible conflict of interest and abstains from voting. The minutes reflect this abstention and the reason for it. If a question arises concerning the existence of a conflict of interest, the matter may be referred to the legal counsel for the Tri-County Council for the Lower Eastern Shore of Maryland for a decision.

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

- **tracks funding types, funding amounts, obligations, expenditures and assets.**
- **permits the tracking of program income, stand-in costs, and leveraged funds.**
- **is adequate to prepare financial reports required by the State**

TCC's Administration department's financial division utilizes QuickBooks Enterprise for its accounting software. Each division within TCC has its own isolated set of books to ensure that there is no co-mingling of funds or expenses between grants and divisions. Within LSWA's books individual grant income and expense is tracked separately by the use of classes. The class structure and chart of account structure are designed to properly track incomes, expenditures, assets and liabilities according to federal accounting principles and in a manner to properly generate the reports required by the state. TCC has created a semi-automated system for cost

allocation and grant tracking. This system is fully documented. Finance staff perform a monthly close which is reviewed by the Admin Svcs. Dir. prior to processing. Reports are generated monthly for the director to review and MD Labor fiscal staff have reviewed the process on-site.

TCC contracts annually with an independent certified public accounting firm to complete our financial statement audit. Said auditors' methodology is in compliance with federal regulations and is GAAP compliant.

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

Tri-County Council staff engaged in the management of WIOA funds are listed by title.

Tri-County Council

- TCC Executive Director
- TCC Administrative Services Director
- Staff Accountant AR/Billing/Grants Management
- Staff Accountant Payroll/Procurement Management
- Staff Accountant Banking/AP/Revolving Loan Fund
- Staff Accountant AP/Data Entry/Document Management/Fixed Assets

LSWA

- Director
- Deputy Director
- Operations Coordinator
- Youth Program Manager

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

TCC uses QuickBooks accounting system. Chart of Account setup and expense/procurement policies ensure that all expenses are tracked in a granular manner according to their type. I.e. all phone expenses are entered into Chart of Account 005 Phone. Each grant has its own Class. A Class is a way to group income and expenses together. This allows for the

tracking of income and expenses by grant and ensures that income and expenses are not co-mingled between grants/programs inappropriately. Some costs are allocated to the grants from Cost Pools using a documented Cost Pool Allocation Plan.

(P) Provide a brief description of the following

- **Fiscal reporting system**
  TCC uses Intuit QuickBooks for accounting of all grant funds. Additional reporting information is kept electronically in structured spreadsheets using Microsoft Excel 2010. All systems and information are secured directly by login access limitations or by file system access controls.
- **Obligation control system**

  Obligations are recorded as expenses are incurred. This allows for the appropriate level of control over expenses and requisitioning of funds.
- **ITA payment system**
  ITA's are signed by the participant, the Workforce Director and the training institution. Payment related to the ITA is made by check directly to the training institution after receipt of an invoice.
- **Chart of account system**
  The chart of account structure is designed to properly track incomes, expenditures, assets and liabilities according to federal accounting principles and in a manner to properly generate the reports required by the state.
- **Accounts payable system**
  Invoices received require a statement sheet to be submitted with the invoice before payment is made. Statement sheets serve as the department's request for the Finance Department to process payment; the form must reflect the class, amount, funding stream and include the designated department signature along with the invoice. Checks are created using Quickbooks; the Executive Department is responsible for review and signature.

- **Staff payroll system**
  Electronic timesheets are submitted by the employee and approved by the supervisor. TCC's Payroll Specialist electronically transfers the timesheets to the third-party payroll administrator. The Payroll Specialist reviews each individual paycheck for accuracy and approves payment. Paychecks or direct deposit payments are created and delivered to the Payroll Specialist for distribution.
- **Participant payroll system**
  Participants do not currently participate in activities requiring TCC payroll payments.
- **Participant stipend payment system**

  Participants do not currently receive stipends. However, supportive services are provided by reimbursement directly to the individual with a verifiable receipt for payment and approval by the Workforce Director.

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

TCC will follow federal regulations related to cash management requirements. TCC will requisition cash from MD Labor at least a monthly basis to ascertain that sufficient cash is on hand to meet immediate needs for grants administered. The review and processing of requesting cash on a routine basis will also allow TCC to time cash receipts and disbursements to minimize the time between receipt of funds and disbursement. The Senior Accountant will be in charge of cash management.

(R) A description of the Local Board's cost allocation procedures including-

- **Identification of different cost pools.**
- **Procedures used for distribution of funds from each cost pool.**
- **Description of funds included in each cost pool**
  There are currently two cost pools.

1. Adult/Dislocated Worker Cost Pool, allocated to Adult and Dislocated Worker funding
2. WIOA Cost Pool, allocated to Adult, Dislocated Worker, and Youth funding

The allocation percentages determined for each cost pool are based on participant counts.

- **Procedures for distribution of staff costs between cost categories (Administrative cost, program cost and indirect cost).**
  TCC/LSWA uses an audited Cost Allocation Plan that takes non-grant specific expenses inside the programs and allocates them using two cost pools. TCC uses an Indirect Cost Rate (ICR) approved by its cognizant agency to charge support service costs from the TCC administration department for HR, Finance/Accounting, IT and Risk Management services administration.
- **Description of cost allocation plans for American Job Centers.**
  The cost allocation plan for the AJC is described in the Resource Sharing Agreement each year. Each agreement describes 1) in-kind contributions, and 2) a shared "cash" contribution.

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

Grant award agreements have the following language that allows for the collection of debts if/when needed:

- *Disallowed costs: Disallowed costs are those charges to a grant which the grantor agency or its representative determines to be unallowable in accordance with the applicable Federal Cost Principals or other conditions contained in the grant.*
- *In the event a final audit has been performed prior to the closeout of the grant, the grantor shall retain the right to recover an appropriate amount after fully considering the recommendation on disallowed costs from the final audit.*

TCC has attorneys on retainer to obtain judgments and perform collections in the event these services are necessary.

JOBSEQ

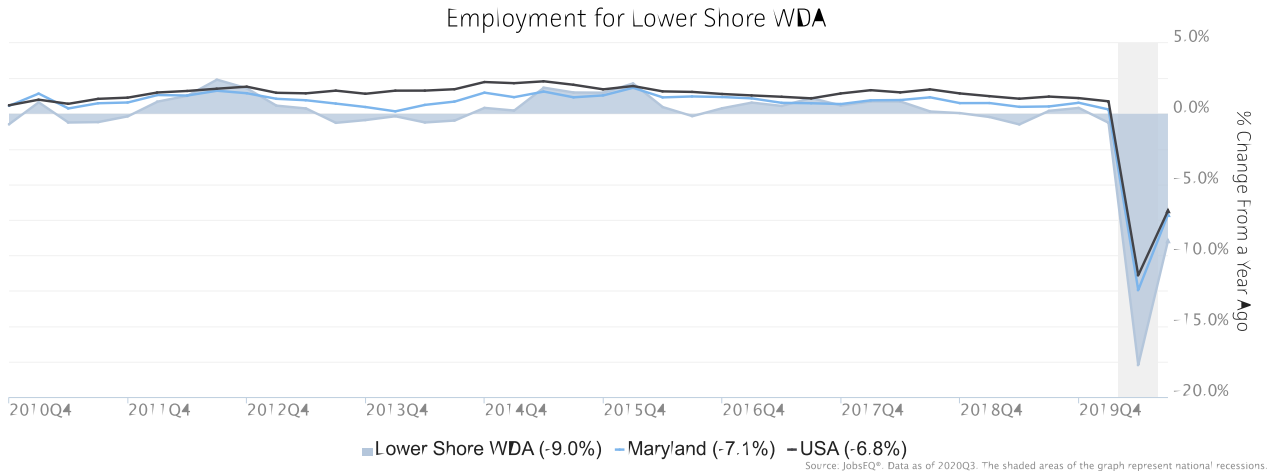
ATTACHMENT A: ECONOMIC OVERVIEW

Economic Overview

Lower Shore WDA

Employment Trends

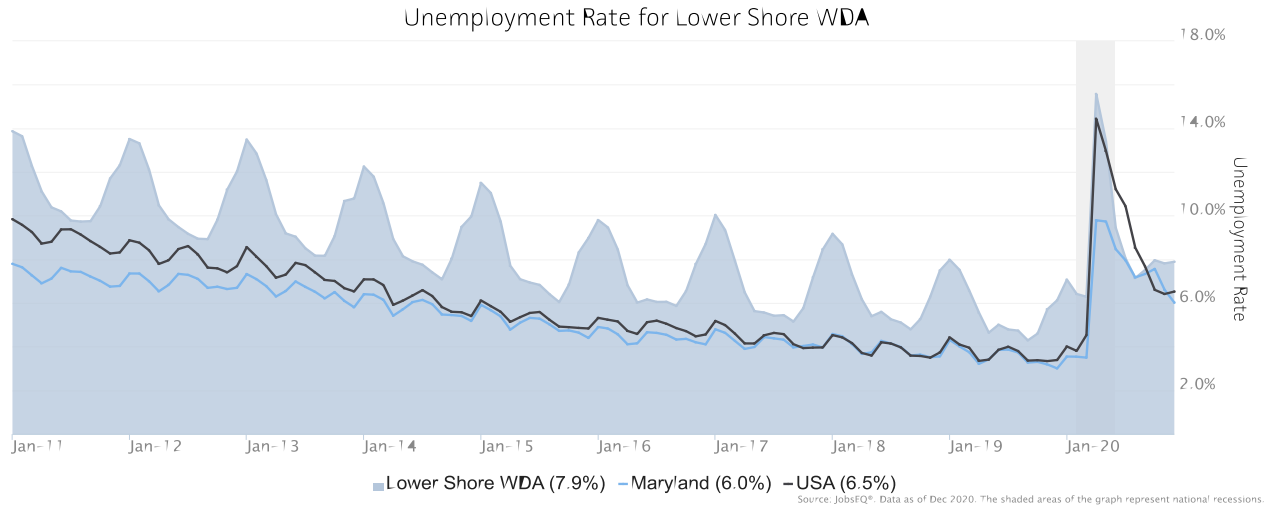
As of 2020Q3, total employment for the Lower Shore WDA was 76,921 (based on a four-quarter moving average). Over the year ending 2020Q3, employment declined 9.0% in the region.



Employment data are derived from the Quarterly Census of Employment and Wages, provided by the Bureau of Labor Statistics and imputed where necessary. Data are updated through 2020Q2 with preliminary estimates updated to 2020Q3.

Unemployment Rate

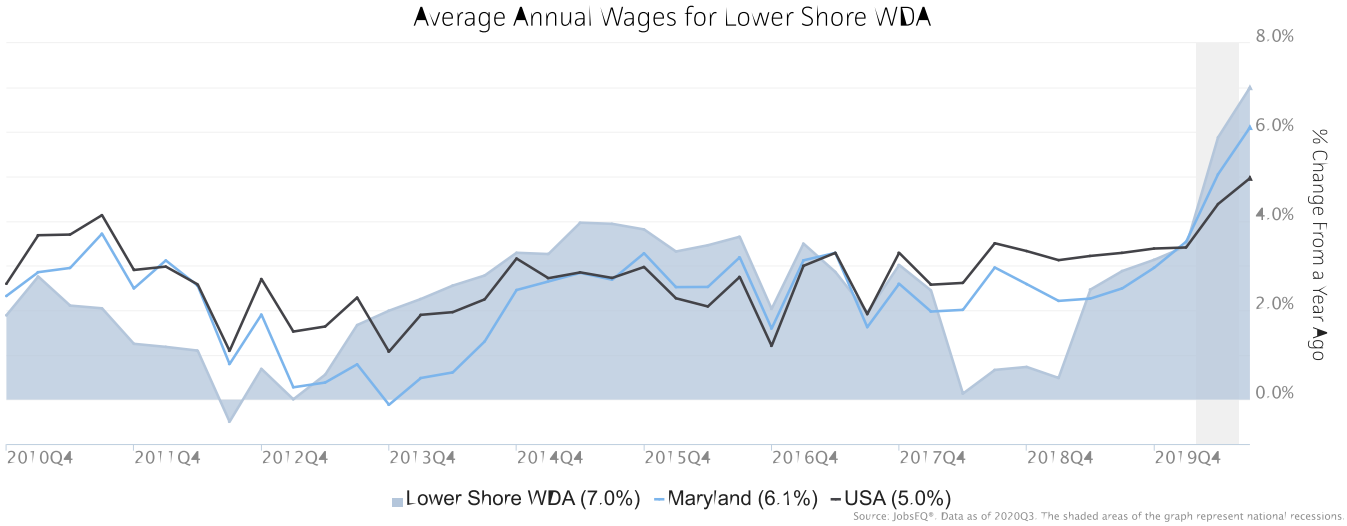
The unemployment rate for the Lower Shore WDA was 7.9% as of December 2020. The regional unemployment rate was higher than the national rate of 6.5%. One year earlier, in December 2019, the unemployment rate in the Lower Shore WDA was 6.1%.



Unemployment rate data are from the Local Area Unemployment Statistics, provided by the Bureau of Labor Statistics and updated through December 2020.

Wage Trends

The average worker in the Lower Shore WDA earned annual wages of $44,299 as of 2020Q3. Average annual wages per worker increased 7.0% in the region over the preceding four quarters. For comparison purposes, annual average wages were $60,042 in the nation as of 2020Q3.



Annual average wages per worker data are derived from the Quarterly Census of Employment and Wages, provided by the Bureau of Labor Statistics and imputed where necessary. Data are updated through 2020Q2 with preliminary estimates updated to 2020Q3.

Cost of Living Index

The Cost of Living Index estimates the relative price levels for consumer goods and services. When applied to wages and salaries, the result is a measure of relative purchasing power. The cost of living is 3.0% higher in Lower Shore WDA than the U.S. average.

Cost of Living Information

	Annual Average Salary	Cost of Living Index (Base US)	US Purchasing Power
Lower Shore WDA	$44,299	103.0	$42,995
Maryland	$64,347	124.5	$51,684
USA	$60,042	100.0	$60,042

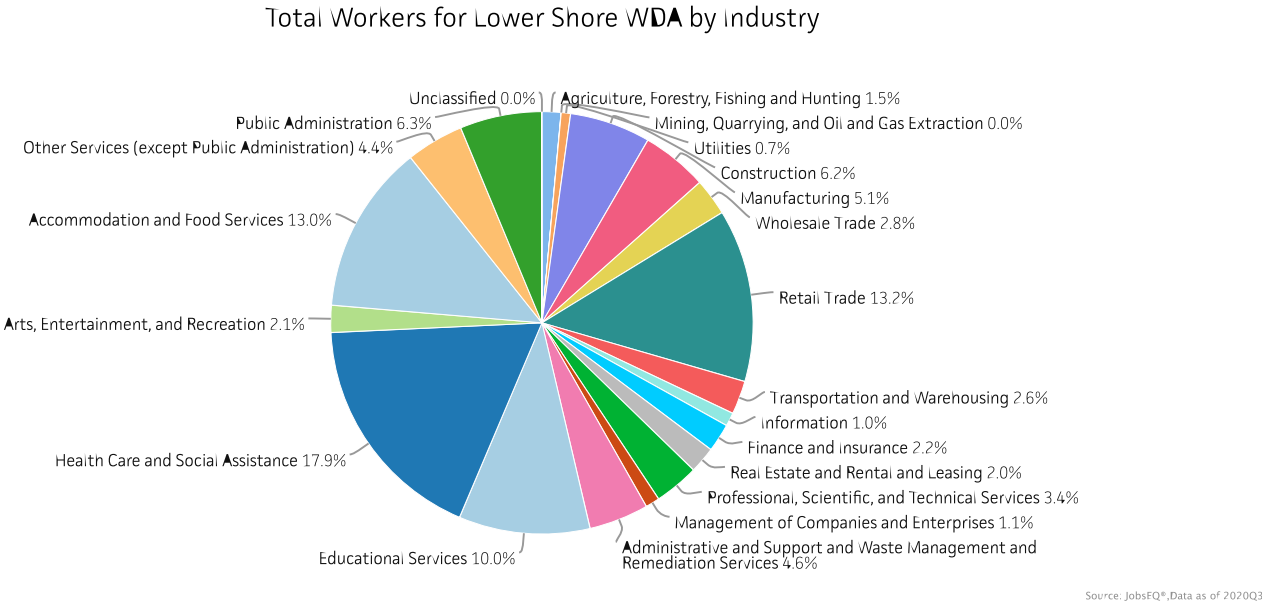
Source: JobsEQ®

Data as of 2020Q3

Cost of Living per C2ER, data as of 2020q3, imputed by Chmura where necessary.

Industry Snapshot

The largest sector in the Lower Shore WDA is Health Care and Social Assistance, employing 13,759 workers. The next-largest sectors in the region are Retail Trade (10,176 workers) and Accommodation and Food Services (9,972). High location quotients (LQs) indicate sectors in which a region has high concentrations of employment compared to the national average. The sectors with the largest LQs in the region are Accommodation and Food Services (LQ = 1.61), Utilities (1.35), and Retail Trade (1.29).



Employment data are derived from the Quarterly Census of Employment and Wages, provided by the Bureau of Labor Statistics and imputed where necessary. Data are updated through 2020Q2 with preliminary estimates updated to 2020Q3.

Sectors in the Lower Shore WDA with the highest average wages per worker are Management of Companies and Enterprises ($125,206), Utilities ($107,113), and Agriculture, Forestry, Fishing and Hunting ($68,823). Regional sectors with the best job growth (or most moderate job losses) over the last 5 years are Health Care and Social Assistance (+662 jobs), Administrative and Support and Waste Management and Remediation Services (+383), and Construction (+330).

Over the next 5 years, employment in the Lower Shore WDA is projected to contract by 846 jobs. The fastest growing sector in the region is expected to be Health Care and Social Assistance with a +0.7% year-over-year rate of growth. The strongest forecast by number of jobs over this period is expected for Health Care and Social Assistance (+502 jobs), Arts, Entertainment, and Recreation (+33), and Administrative and Support and Waste Management and Remediation Services (+26).

			Current		5-Year History			5-Year Forecast			
NAICS	Industry	Empl	Avg Ann Wages	LQ	Empl Change	Ann %	Total Demand	Exits	Transfers	Empl Growth	Ann % Growth
62	Health Care and Social Assistance	13,759	$53,350	1.21	662	1.0%	7,082	3,235	3,345	502	0.7%
44	Retail Trade	10,176	$30,309	1.29	-630	-1.2%	6,130	2,929	3,700	-499	-1.0%
72	Accommodation and Food Services	9,972	$24,123	1.61	-2,462	-4.3%	8,064	3,565	4,490	8	0.0%
61	Educational Services	7,724	$53,557	1.22	-108	-0.3%	3,394	1,701	1,835	-141	-0.4%
92	Public Administration	4,831	$49,098	1.28	-320	-1.3%	2,076	927	1,261	-112	-0.5%
23	Construction	4,753	$47,045	1.06	330	1.5%	2,221	827	1,480	-86	-0.4%
31	Manufacturing	3,899	$46,916	0.62	-568	-2.7%	1,838	734	1,257	-153	-0.8%
56	Administrative and Support and Waste Management and Remediation Services	3,517	$34,301	0.73	383	2.3%	2,059	860	1,173	26	0.1%
81	Other Services (except Public Administration)	3,393	$30,541	1.01	-215	-1.2%	1,920	879	1,050	-9	-0.1%
54	Professional, Scientific, and Technical Services	2,634	$55,737	0.49	53	0.4%	1,076	414	701	-40	-0.3%
42	Wholesale Trade	2,177	$53,433	0.74	-191	-1.7%	1,019	420	697	-98	-0.9%
48	Transportation and Warehousing	1,966	$46,335	0.54	12	0.1%	975	438	593	-56	-0.6%
52	Finance and Insurance	1,662	$62,638	0.52	-182	-2.1%	716	289	474	-48	-0.6%
71	Arts, Entertainment, and Recreation	1,596	$27,155	1.20	-247	-2.8%	1,164	506	625	33	0.4%
53	Real Estate and Rental and Leasing	1,558	$41,077	1.16	-82	-1.0%	723	352	422	-51	-0.7%
11	Agriculture, Forestry, Fishing and Hunting	1,119	$68,823	1.06	-135	-2.3%	528	251	338	-62	-1.1%
55	Management of Companies and Enterprises	823	$125,206	0.70	-188	-4.0%	367	137	233	-3	-0.1%
51	Information	802	$52,183	0.53	-109	-2.5%	327	135	240	-48	-1.2%
22	Utilities	550	$107,113	1.35	-51	-1.8%	195	86	152	-43	-1.6%
21	Mining, Quarrying, and Oil and Gas Extraction	10	$46,006	0.03	-17	-17.8%	5	2	4	0	-0.1%
99	Unclassified	1	$124,340	0.01	1	n/a	0	0	0	0	-0.2%

		Current			5-Year History		5-Year Forecast				
NAICS	Industry	Empl	Avg Ann Wages	LQ	Empl Change	Ann %	Total Demand	Exits	Transfers	Empl Growth	Ann % Growth
	Total - All Industries	**76,921**	**$44,299**	**1.00**	**-4,064**	**-1.0%**	**40,794**	**17,797**	**23,843**	**-846**	**-0.2%**

Source: JobsEQ®

Employment data are derived from the Quarterly Census of Employment and Wages, provided by the Bureau of Labor Statistics and imputed where necessary. Data are updated through 2020Q2 with preliminary estimates updated to 2020Q3. Forecast employment growth uses national projections adapted for regional growth patterns.

Occupation Snapshot

The largest major occupation group in the Lower Shore WDA is Office and Administrative Support Occupations, employing 9,070 workers. The next-largest occupation groups in the region are Sales and Related Occupations (8,552 workers) and Food Preparation and Serving Related Occupations (8,274). High location quotients (LQs) indicate occupation groups in which a region has high concentrations of employment compared to the national average. The major groups with the largest LQs in the region are Food Preparation and Serving Related Occupations (LQ = 1.38), Personal Care and Service Occupations (1.27), and Building and Grounds Cleaning and Maintenance Occupations (1.25).

Occupation groups in the Lower Shore WDA with the highest average wages per worker are Management Occupations ($104,600), Legal Occupations ($95,000), and Healthcare Practitioners and Technical Occupations ($86,600). The unemployment rate in the region varied among the major groups from 2.5% among Healthcare Practitioners and Technical Occupations to 17.4% among Personal Care and Service Occupations.

Over the next 5 years, the fastest growing occupation group in the Lower Shore WDA is expected to be Healthcare Support Occupations with a +1.2% year-over-year rate of growth. The strongest forecast by number of jobs over this period is expected for Healthcare Support Occupations (+249 jobs) and Healthcare Practitioners and Technical Occupations (+85). Over the same period, the highest separation demand (occupation demand due to retirements and workers moving from one occupation to another) is expected in Food Preparation and Serving Related Occupations (7,217 jobs) and Sales and Related Occupations (5,931).

Lower Shore WDA, 2020Q3[1]

		Current						5-Year History		5-Year Forecast				
SOC	Occupation	Empl	Mean Ann Wages[2]	LQ	Unempl	Unempl Rate	Online Job Ads[3]	Empl Change	Ann %	Total Demand	Exits	Transfers	Empl Growth	Ann % Growth
43-0000	Office and Administrative Support	9,070	$36,800	0.92	598	6.2%	283	-673	-1.4%	4,566	2,102	2,951	-487	-1.1%
41-0000	Sales and Related	8,552	$37,600	1.15	790	8.7%	767	-764	-1.7%	5,558	2,387	3,544	-374	-0.9%
35-0000	Food Preparation and Serving Related	8,274	$25,300	1.38	1,518	16.3%	394	-2,092	-4.4%	7,298	2,892	4,325	81	0.2%
29-0000	Healthcare Practitioners and Technical	5,441	$86,600	1.21	125	2.5%	539	424	1.6%	1,614	698	831	85	0.3%

Lower Shore WDA, 2020Q3[1]

		Current						5-Year History		5-Year Forecast				
SOC	Occupation	Empl	Mean Ann Wages[2]	LQ	Unempl	Unempl Rate	Online Job Ads[3]	Empl Change	Ann %	Total Demand	Exits	Transfers	Empl Growth	Ann % Growth
53-0000	Transportation and Material Moving	5,181	$36,100	0.80	586	9.6%	365	-163	-0.6%	3,134	1,205	2,019	-90	-0.4%
25-0000	Educational Instruction and Library	4,905	$58,600	1.13	352	7.0%	139	-16	-0.1%	2,115	989	1,168	-42	-0.2%
11-0000	Management	4,903	$104,600	0.97	168	3.4%	227	1	0.0%	1,986	658	1,367	-39	-0.2%
31-0000	Healthcare Support	3,918	$29,000	1.14	217	5.4%	160	194	1.0%	2,776	1,209	1,318	249	1.2%
47-0000	Construction and Extraction	3,454	$42,800	0.96	462	10.7%	75	105	0.6%	1,813	544	1,320	-51	-0.3%
13-0000	Business and Financial Operations	3,212	$65,700	0.75	130	3.9%	106	19	0.1%	1,511	443	1,081	-13	-0.1%
37-0000	Building and Grounds Cleaning and Maintenance	3,184	$29,100	1.25	299	8.9%	134	-228	-1.4%	2,064	896	1,174	-6	0.0%
49-0000	Installation, Maintenance, and Repair	3,110	$45,600	1.06	191	5.7%	171	-50	-0.3%	1,435	480	1,013	-58	-0.4%
51-0000	Production	2,742	$35,700	0.61	285	8.2%	83	-262	-1.8%	1,424	541	1,008	-125	-0.9%
39-0000	Personal Care and Service	2,570	$31,100	1.27	541	17.4%	59	-155	-1.2%	2,032	867	1,133	32	0.2%
33-0000	Protective Service	1,804	$48,800	1.08	79	4.1%	40	-110	-1.2%	875	401	514	-40	-0.4%
21-0000	Community and Social Service	1,571	$46,000	1.16	43	3.0%	112	1	0.0%	935	285	581	69	0.9%
15-0000	Computer and Mathematical	1,562	$80,500	0.66	58	3.6%	79	-18	-0.2%	574	132	442	1	0.0%
27-0000	Arts, Design, Entertainment, Sports, and Media	1,046	$49,400	0.76	119	10.5%	32	-78	-1.4%	531	202	360	-31	-0.6%
17-0000	Architecture and Engineering	861	$80,200	0.64	30	3.4%	43	-154	-3.2%	309	100	229	-20	-0.5%
19-0000	Life, Physical, and Social Science	673	$71,700	0.97	27	4.0%	48	11	0.3%	312	63	248	0	0.0%
45-0000	Farming, Fishing, and Forestry	452	$33,300	0.88	53	10.8%	6	-61	-2.5%	329	85	265	-20	-0.9%
23-0000	Legal	437	$95,000	0.67	11	2.7%	5	4	0.2%	136	54	86	-3	-0.2%

Lower Shore WDA, 2020Q3[1]

		Current						5-Year History		5-Year Forecast				
SOC	Occupation	Empl	Mean Ann Wages[2]	LQ	Unempl	Unempl Rate	Online Job Ads[3]	Empl Change	Ann %	Total Demand	Exits	Transfers	Empl Growth	Ann % Growth
	Total - All Occupations	**76,921**	**$48,400**	**1.00**	**6,682**	**8.1%**	**3,867**	**-4,064**	**-1.0%**	**43,362**	**17,233**	**26,978**	**-849**	**-0.2%**

Source: JobsEQ®

Data as of 2020Q3 unless noted otherwise

Note: Figures may not sum due to rounding.

1. Data based on a four-quarter moving average unless noted otherwise.

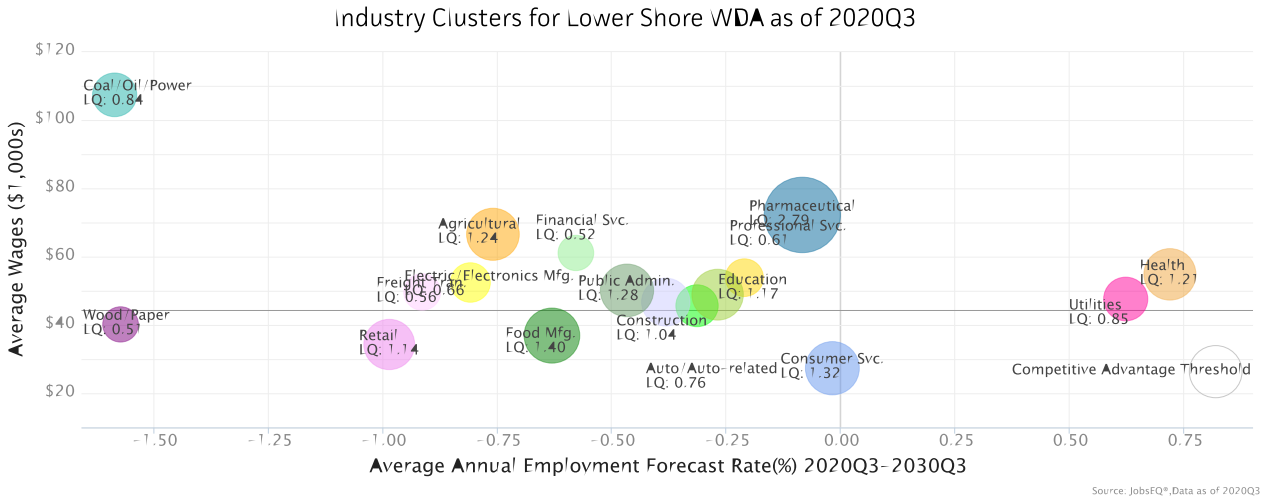
2. Wage data are as of 2019 and represent the average for all Covered Employment

3. Data represent found online ads active within the last thirty days in the selected region; data represents a sampling rather than the complete universe of postings. Ads lacking zip code information but designating a place (city, town, etc.) may be assigned to the zip code with greatest employment in that place for queries in this analytic. Due to alternative county-assignment algorithms, ad counts in this analytic may not match that shown in RTI (nor in the popup window ad list).

Occupation employment data are estimated via industry employment data and the estimated industry/occupation mix. Industry employment data are derived from the Quarterly Census of Employment and Wages, provided by the Bureau of Labor Statistics and currently updated through 2020Q2, imputed where necessary with preliminary estimates updated to 2020Q3. Wages by occupation are as of 2019 provided by the BLS and imputed where necessary. Forecast employment growth uses national projections from the Bureau of Labor Statistics adapted for regional growth patterns.

Industry Clusters

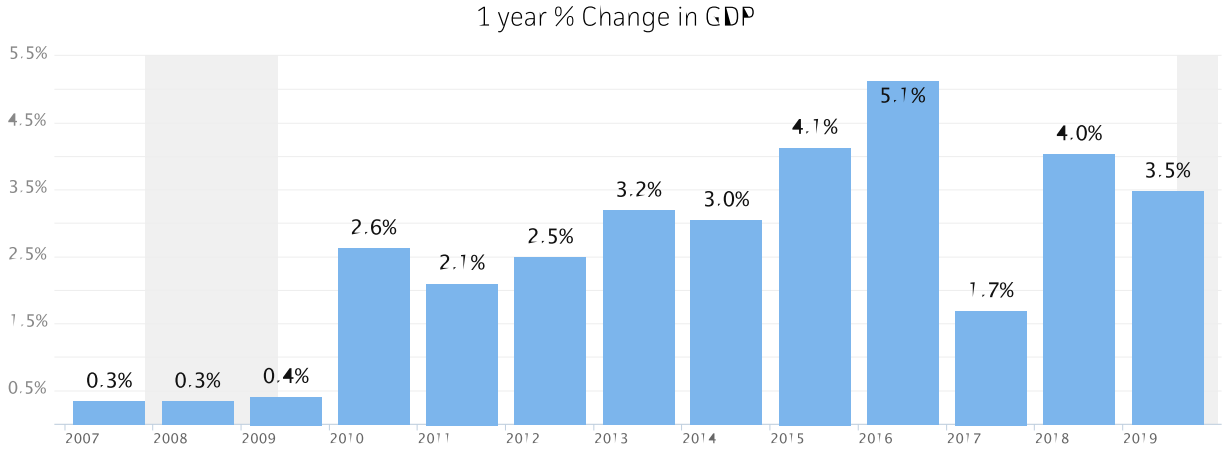
A cluster is a geographic concentration of interrelated industries or occupations. The industry cluster in the Lower Shore WDA with the highest relative concentration is Pharmaceutical with a location quotient of 2.79. This cluster employs 439 workers in the region with an average wage of $72,271. Employment in the Pharmaceutical cluster is projected to contract in the region about 0.1% per year over the next ten years.



Location quotient and average wage data are derived from the Quarterly Census of Employment and Wages, provided by the Bureau of Labor Statistics, imputed where necessary, and updated through 2020Q2 with preliminary estimates updated to 2020Q3. Forecast employment growth uses national projections from the Bureau of Labor Statistics adapted for regional growth patterns.

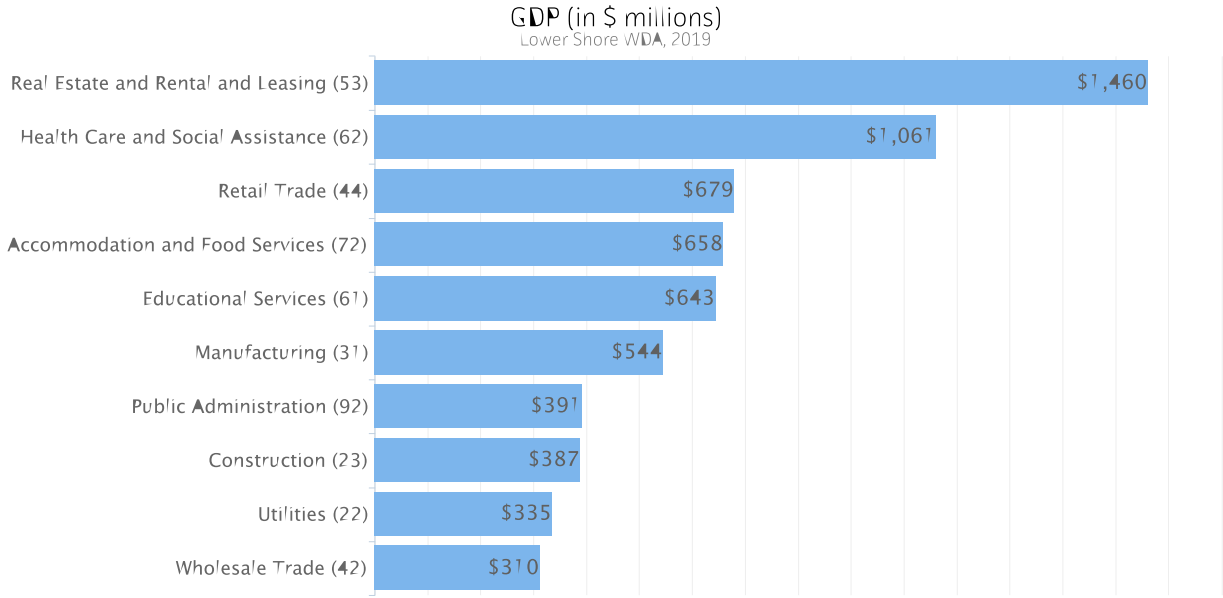
Gross Domestic Product

Gross Domestic Product (GDP) is the total value of goods and services produced by a region. In 2019, nominal GDP in the Lower Shore WDA expanded 3.5%. This follows growth of 4.0% in 2018. As of 2019, total GDP in the Lower Shore WDA was $8,462,194,000.



Gross Domestic Product data are provided by the Bureau of Economic Analysis, imputed by Chmura where necessary, updated through 2019.

Of the sectors in the Lower Shore WDA, Real Estate and Rental and Leasing contributed the largest portion of GDP in 2019, $1,459,970,000 The next-largest contributions came from Health Care and Social Assistance ($1,061,030,000); Retail Trade ($679,022,000); and Accommodation and Food Services ($657,856,000).



Gross Domestic Product data are provided by the Bureau of Economic Analysis, imputed by Chmura where necessary, updated through 2019.

FAQ

What is a location quotient?

A location quotient (LQ) is a measurement of concentration in comparison to the nation. An LQ of 1.00 indicates a region has the same concentration of an industry (or occupation) as the nation. An LQ of 2.00 would mean the region has twice the expected employment compared to the nation and an LQ of 0.50 would mean the region has half the expected employment in comparison to the nation.

What is separation demand?

Separation demand is the number of jobs required due to separations—labor force exits (including retirements) and turnover resulting from workers moving from one occupation into another. Note that separation demand does not include all turnover—it does not include when workers stay in the same occupation but switch employers. The total projected demand for an occupation is the sum of the separation demand and the growth demand (which is the increase or decrease of jobs in an occupation expected due to expansion or contraction of the overall number of jobs in that occupation).

What is a cluster?

A cluster is a geographic concentration of interrelated industries or occupations. If a regional cluster has a location quotient of 1.25 or greater, the region is considered to possess a competitive advantage in that cluster.

What is the difference between industry wages and occupation wages?

Industry wages and occupation wages are estimated via separate data sets, often the time periods being reported do not align, and wages are defined slightly differently in the two systems (for example, certain bonuses are included in the industry wages but not the occupation wages). It is therefore common that estimates of the average industry wages and average occupation wages in a region do not match exactly.

What is NAICS?

The North American Industry Classification System (NAICS) is used to classify business establishments according to the type of economic activity. The NAICS Code comprises six levels, from the "all industry" level to the 6-digit level. The first two digits define the top level category, known as the "sector," which is the level examined in this report.

What is SOC?

The Standard Occupational Classification system (SOC) is used to classify workers into occupational categories. All workers are classified into one of over 804 occupations according to their occupational definition. To facilitate classification,

occupations are combined to form 22 major groups, 95 minor groups, and 452 occupation groups. Each occupation group includes detailed occupations requiring similar job duties, skills, education, or experience.

About This Report

This report and all data herein were produced by JobsEQ®, a product of Chmura Economics & Analytics. The information contained herein was obtained from sources we believe to be reliable. However, we cannot guarantee its accuracy and completeness.

Source: JobsEQ®, http://www.chmuraecon.com/jobseq
Copyright © 2021 Chmura Economics & Analytics, All Rights Reserved.

ATTACHMENT B: DISCRIMINATION COMPLAINT PROCEDURES

Overview

These complaint procedures were developed to provide methods for attempting the resolution of complaints arising as a result of the Local Workforce Development Area's (LWDA) operation of WIOA Title I-funded programs, which allege violations of WIOA. The Lower Shore Workforce Development Board (WDB) will be notified of any complaints received by the Lower Shore Workforce Alliance (LSWA).

A. Availability of Lower Shore Workforce Alliance Complaint Procedures

Participants in programs funded by the Lower Shore Workforce Alliance with WIOA funds, subcontractors, or sub-recipients of the Lower Shore Workforce Alliance which receive WIOA funds, or other interested persons may file complaints using these procedures. Notice about the availability of these procedures will be given to:

1. Participants, upon enrollment into or first contact with their program;
2. Sub-recipients and subcontractors, prior to the signing of grant agreements or contracts; and
3. Other interested parties, upon their request to the Lower Shore Workforce Alliance;
4. Documentation of the receipt of the complaint procedures information will be maintained in the appropriate file(s) of the Lower Shore Workforce Alliance

B. Types of Complaints

Complaints which may be processed using these procedures (i.e., complaints alleging violations of the WIA or its implementing regulation) will be classified by the Lower Shore Workforce Alliance as one of two types, upon review of the complaints content. Each type of complaint will be handled in a different fashion, pursuant to Section 667.600 of the WIOA regulations. The two types of complaints are:

1. Type I Complaints - These are complaints which allege discrimination on the basis of any of the following:

- race
- sex
- color
- national origin
- religious belief
- age
- political affiliation
- citizenship
- gender
- disability
- participation in WIOA programs

2. Type II Complaints - These are complaints which do not allege any form of illegal discrimination.

Procedures

A. Type I Complaint Procedure (alleging discrimination on the basis of race, sex, color, national origin, religious belief, age, political affiliation, citizenship, gender, disability, participation in a WIOA program.

1. Filing the Complaint

   a. The Lower Shore Workforce Alliance encourages all persons with complaints to first discuss their concerns with the persons who have caused those concerns. However, if after discussing the problem the individual still wishes to formally pursue resolution of his/her complaint, he/she may choose one of the following options:

      i. Pursue resolution through the Directorate of Civil Rights

      ii. Pursue resolution through the Lower Shore Workforce Alliance and/or its sub-recipients

      iii. Concurrently pursue the complaint through the Directorate of Civil Rights and the Lower Shore Workforce Alliance and/or its sub-recipients.

   b. All complaints alleging discrimination on any of the basis listed above must be filed within 180 days of the event which triggered the complaint.

   c. Complaints filed with the Lower Shore Workforce Alliance Council must be documented on the form, which is Attachment #1 to these procedures.

2. Resolving the Complaint

   a. Directorate of Civil Rights (DCR) Investigation – A complainant may file a Type I complaint with the DCR at any time. There is no waiting time or lower level hearings, which must precede this filing. Details on the steps which the complainant must follow in filing a complaint with the DCR will be provided to the complainant when requested.

   b. Lower Shore Workforce Alliance/Sub-recipient Procedures - If a complainant wishes to first seek a resolution of his/her complaint through the Lower Shore Workforce Alliance, those who are participants in Lower Shore Workforce Alliance sub-recipient programs must file their complaint in accordance with the procedures established by the sub-recipient.

      Representatives of sub-recipients or other interested persons have the option of either filing their complaint with the sub-recipient (e.g. for interested persons) or with the Lower Shore Workforce Alliance.

      i. Sub-recipient procedural guidelines – Sub-recipients of the Lower Shore Workforce Alliance must immediately notify the Lower Shore Workforce Alliance of all complaints received in writing which allege discrimination on the basis of race, sex, color, national origin, religious belief, age, political affiliation, citizenship, gender, disability, participation in a program or participation in a WIOA program. The Lower Shore Workforce Alliance then will immediately notify MD Labor and the Directorate Civil Rights of the complaint's existence and content. A form is available for this notification.

         Sub-recipients are permitted 30 days to attempt a resolution of the complaint using the procedures developed by the sub-recipient. If after 30 days from the date of filing the complaint, the complainant has not achieved a satisfactory resolution of his/her complaint, he/she may file the complaint with the Lower Shore Workforce Alliance. The form included as Attachment #1 should be used to document the complaint.

ii. Lower Shore Workforce Alliance Procedures - Upon receipt of a written Type I complaint, the Lower Shore Workforce Alliance will convene a hearing to which the complainant and other person(s) involved in the complaint are invited. The Lower Shore Workforce Alliance will hold this hearing within 15 days of the receipt of the complaint and will identify a person who is not involved in the complaint to preside as the hearing officer.

The hearing officer will issue a written description of his/her judgment regarding the complaint, including his/her recommendation for resolving the complaint within 30 days of the date that the complaint was first filed (either at the sub-recipient level or with the Lower Shore Workforce Alliance).

c. Concurrent procedure - Complainants may choose to file their discrimination complaint with both the Lower Shore Workforce Alliance/Sub-recipient and the Directorate of Civil Rights at the same time. In that case, the procedures described above under a and b should be followed concurrently.

B. Type II Complaint Procedure (not alleging any form of illegal discrimination)

1. Filing the Complaint

The Lower Shore Workforce Alliance strongly encourages all persons with complaints to first discuss their concerns with the persons who have caused these concerns. However, if after discussing the problem, the individual still wishes to formally pursue resolution of his/her complaint, he/she must adhere to the following guidelines.

a. Complainants who are participants in the Lower Shore Workforce Alliance sub-recipient programs must file their complaint in accordance with the procedures established by the sub-recipient. Representatives of sub-recipients or other interested persons have the option to either filing their

complaint with the sub-recipient (e.g. for "interested persons") or with the Lower Shore Workforce Alliance.

b. All complaints not alleging discrimination must be filed within one year of the event, which triggered the complaint.

c. Complaints filed with the Lower Shore Workforce Alliance must be documented on the available form, which is attachment #1 to these procedures.

2. Resolving the Complaint

a. Sub-recipient procedural guidelines – Sub-recipients are not limited by time in their handling of non-discrimination complaints. The existing complaint procedures adopted by the sub-recipient should be followed.

If after exhaustion of the sub-recipient's procedure a complainant is dissatisfied with the proposed solution to his/her complaints, he/she may file the complaint with the Lower Shore Workforce Alliance. A form is available to document the complaint.

b. Lower Shore Workforce Alliance Procedures - Upon receipt of a written complaint not alleging discrimination, the Lower Shore Workforce Alliance will convene a hearing to which the complainant and other persons involved in the complaint will be invited. Written notices (invitations to attend) about the hearing will include the date, time and location of the hearing. The Lower Shore Workforce Alliance will hold the hearing within 30 days of the date on which it received the written complaint (on the available form) and will identify a person who is not involved in the complaint to preside as the hearing officer.

At the hearing, an opportunity will be provided for all parties (persons) involved in the complaint to present evidence. An audio tape of the complete hearing will be made and maintained for possible review by MD Labor.

A written decision on the complaint, arising from the hearing, will be issued to all persons at the hearing within 60 days of

the date on which the Lower Shore Workforce Alliance received the complaint.

c. Additional procedures - If a complainant does not receive a decision by the Lower Shore Workforce Alliance within 60 days from the date he/she filed the complaint with the Lower Shore Workforce Alliance or received a decision satisfactory to the complainant the complainant (only) has the right to request a review by MD Labor. A request for this review must be made within 10 days from the date on which the complainant should have received a decision (60 days after filing with the Lower Shore Workforce Alliance). Details on how to file a request for MD Labor review will be provided in the written decision rendered by the Lower Shore Workforce Alliance.

C. Other Complaint Procedures

Complaints arising from action taken by the grantee with investigation or monitoring reports of sub-grantees, contractors and other sub-recipients will follow the course of Type II Complaints as stated in the attached procedures.

All employers of participants under the WIOA program will be requested to have a complaint procedure relating to the terms and conditions of employment available to participants.

ATTACHMENT C: PERSONALLY IDENTIFIABLE INFORMATION

Personal Identity Information (PII) Security, Notification and Confidentiality Policy

Purpose of this Policy

Tri-County Council recognizes its need to maintain confidentiality of Personal Identity Information (PII) and other business information. TCC understands that such information is unique to each individual. The PII covered by this policy may come from various types of individuals performing tasks on behalf of TCC and includes employees, volunteers, interns, applicants, independent contractors and any PII maintained on its customer base. The scope of this policy is intended to be comprehensive and will include TCC requirements for the security and protection of such information throughout TCC and its approved vendors both on and off work premises.

Division Directors have delegated authority for developing and implementing procedural guidance for ensuring that their responsibilities under this policy are communicated and enforced.

Definition

Federal – 2.CFR.200.79 Personally Identifiable Information (PII) PII means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Some information that is considered to be PII is available in public sources such as telephone books, public web sites, and university listings. This type of information is considered to be Public PII and includes, for example, first and last name, address, work telephone number, email address, home telephone number, and general educational credentials. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified. Non-PII can become PII whenever additional information is made publicly available, in any medium and from any source, that, when combined with other available information, could be used to identify an individual.

MD State – Personal Information Protection Act 1/1/18 (http://www.marylandattorneygeneral.gov/Pages/IdentityTheft/businessGL.aspx)

PIPA defines "personal information" as

- An individual's first and last name in combination with:
  - A Social Security number, an Individual Taxpayer Identification number, a passport number, or other identification number issued by the federal government;
  - A driver's license number or state identification card number;
  - An account number, a credit card number, or a debit card number, in combination with any required security code, access codes, or password, that permits access to an individual's financial account;
  - Health information, including information about an individual's mental health;
  - A health insurance policy or certificate number or health insurance subscriber identification number, in combination with a unique identifier used by an insurer or an employer that is self-insured, that permits access to an individual's health information; or
  - Biometric data of an individual generated by automatic measurements of an individual's biological characteristics such as a fingerprint, voice print, genetic print, retina or iris image, or other unique biological characteristic, that can be used to uniquely authenticate the individual's identity when the individual accesses a system or account.

Or

- User name or email address in combination with a password or security question and answer that permits access to an individual's email account.

Policy

PII and other confidential information can reside in hard copy or electronic records; both forms of PII and other confidential information fall within this policy.

In addition to PII, TCC expects employees, volunteers, and interns to keep additional information confidential. They include but are not limited to:

- Personnel records, payroll records, and information regarding an employee's salary, length of service, performance or other related personnel information;
- Information such as professional license numbers, employment history, names of spouses, children, parents, guardians, beneficiaries, marital status, physical description, education, financial matters, medical or employment history and other non-public personal information;
- Medical information and information designated as Protected Health Information under the Health Insurance Portability and Accountability Act (HIPAA);
- Agreements, contracts, correspondence, email, internal audits and reports, invoices, memoranda, minutes, strategic or planning reports and information, voice mail;
- Computer system passwords and security codes, access and key controls and ID badges;
- Litigation or other formal charges or complaints;
- Records and documents pending or in the process of investigation.

All PII and confidential information in electronic media must reside and be stored on the drive located on TCC's network servers and designated by Technical Services as secure for that information, not on local workstations, personal computers, laptops, flash drives, etc. The TCC Systems Policy, the TCC Systems Desktop, Laptop and PDA Policy and the TCC Cellphones, PDA's and Recording Devices Policy are specifically incorporated into this policy.

All PII and confidential information in print or paper media must be stored in file cabinets that are secured and locked.

All PII and confidential information that is verbal discussed must be done in an appropriate area, such as, an office without persons that are not approved to have access to the information being discussed. Always make sure these discussions are not held in open areas such as, hallways, break rooms, etc.

Vendors: Individual(s) or companies that have been approved by the Division Director as a recipient of organizational PII and from which the Division Director has received certification of their data protection practices conformance with the requirement of this policy. Vendors include all

external providers of services to the organization and include proposed vendors. No PII information can be transmitted to any vendor in any method unless the vendor has been pre-certified for the receipt of such information.

PII Retention: TCC understands the importance of minimizing the amount of PII data it maintains and retains such PII only as long as necessary. A team comprising of the Executive Director, Division Director(s), Finance, Technical Services and Human Resources maintains organizational record retention procedures, which dictate the length of data retention and data destruction methods for both hard copy and electronic records.

PII Audits: TCC conducts audits of PII information maintained by TCC in conjunction with fiscal year closing activities to ensure that this policy remains strictly enforced and to ascertain the necessity for the continued retention of PII information. Where the need no longer exists, PII information will be destroyed in accordance with protocols for destruction of such records and logs maintained for the dates of destruction. The audits are conducted by Division Directors, Finance, Technical Services, and Human Resources.

Incident Responses

Data Breaches: Electronic information that include PII may be breached inadvertently or through wrongful intrusion. Upon becoming aware of a data breach, TCC will document all activity related to the breach and notify all affected individuals whose PII data may have been compromised in accordance with the Maryland Personal Information Protection Act. The notice will be accompanied by a description of action being taken to reconcile any damage as a result of the data breach. Notices will be provided as expeditiously as possible and in no event be later than the commencement of the payroll period after which the breach was discovered. TCC also uses guidance from the Maryland Department of Information Technology 'Maryland Public and Confidential Information Policy' dated 1/31/17 overall and section 4.5 'Breach Requirements' specifically when dealing with data breaches.

The Executive Director or the Director of Administrative Services will ensure notifications are being handled appropriately and adhere to federal, state and local laws. The Director of Administrative Services will handle breach notification(s) to all governmental agencies and vendors and

Human Resources will handle breach notifications to past and present employee(s). All notification must be provided in accordance with time frames specified under these laws.

Data Access: TCC maintains multiple IT systems where PII data may reside; thus, user access to such IT systems is the responsibility of Technical Services. Technical Services has created internal controls for such systems to establish legitimate access for user of data, and access shall be limited to those approved by Technical Services. Any change in vendor status or the termination of an employee or independent contractor with access will immediately result in the termination of the user's access to all systems where the PII may reside.

Data Transmission and Transportation

1. Company Premises Access to PII: The Finance, Human Resources and Technical Services departments have defined responsibilities for on-site access of data that may include access to PII; Technical Services has the oversight responsibility for all electronic records and data access capabilities. Division Directors have the operational responsibility for designating initial access and termination of access for individual users within TCC and providing timely notice to Technical Services.

2. Vendors: TCC may share data with vendors who have a business need to have PII data. Where such inter-company sharing of data is required, Technical Services is responsible for creating and maintaining data encryption and protection standards to safeguard all PII data that resides in the databases provided to vendors. Approved vendor lists will be maintained by the Director of Administrative Services and the Director of Administrative Services has the responsibility to notify Technical Services of any changes to vendor status with the company.

3. Portable Storage Devices: TCC reserves the right to restrict PII data it maintains in the workplace. In the course of doing business, PII data may also be downloaded to laptops or other computing storage devices to facilitate organization business. To protect such data, TCC also requires that any such devices use Technical Services approved encryption and security protection software while such devises are in use on or off TCC premises. Technical Services has responsibility for maintaining data

encryption and data protection standards to safeguard PII data that resides on these portable storage devices.

4. Off-Site Access to PII: TCC understands that employees may need to access PII while off site or on business travel, and access to such data shall not be prohibited, subject to the provision that the data to be accessed is minimized to the degree possible to meet organization needs and that such data shall reside only on assigned laptops/approved storage devices that have been secured in advance by Technical Services.

Regulatory Requirements: It is the policy of the company to comply with any international, federal, state and local statute reporting regulations. TCC has delegated the responsibility for maintaining PII security provisions to the Division Directors and departments noted in this policy. TCC's Executive Director shall be the sole entity named to oversee all regulatory reporting compliance issues. If any provision of this policy conflicts with a statutory requirement of international, federal, state or local law governing PII, the policy provision(s) that conflict shall be superseded.

Employee Report: If an employee has reason to believe that his or her PII (please refer to what defines PII) data security has been breached or that organization representative(s) are not adhering to the provisions of this policy, an employee should contact Human Resources.

Violations of PII Policies and Procedures: TCC views the protection of PII data to be of the utmost importance. Infractions of this policy will result in disciplinary action up to and including termination.

Effective Date: April 21, 2015

Revised Date: March 19, 2019

ATTACHMENT D: ASSISTIVE TECHNOLOGY PROCEDURES

Assistive Technology Workstation

Providing computer accessibility for individuals with disabilities

The Division of Rehabilitation Services (DORS) is proud to supply Assistive Technology (AT) Workstation to our WIOA partners located in the AJC's throughout the State. Hardware components of these workstations include the following:

Component	Manufacturer	Model or Description
Hardware		
Computer	Dell	OptiPlex 3050 w/ wireless
Monitor	Dell	Ultrasharp U2417H
Mouse	Dell	USB Optical Mouse
Motorized Adj. Table (48"x30")	Vortex	48-in Electric height adjust table
Lg Print keyboard	HDE	HDE Large Print Keyboard USB
Trackball	BIGtrack	BIGtrack 2.0
Multi-Function LaserJet Printer	Dell	Multifunction E514dw w/ 4yr. Warranty
USB Printer Cable	Tripp Lite	USB2.0 A Male to B Male Gold Device Cable - 6 ft
Locking Device	Kensington	Desktop & Peripherals Locking Kit
Headphones (noise canceling)	Sony	MDRZX110NC
Headphone sanitary cover	Hamilton Buhl	Headphone disposable ear cushion cover (50 pairs)
Surge protector	APC	F83389 Surge Professional 7-outlet
External Speaker	Dell	AX510 UltraSharp and Professional Series Flat Panel Stereo Sound Bar
15 ft. CAT6 Ethernet Cable		

All hardware components of this AT workstation are securely locked down using the Kensington Desktop & Peripheral locking kit. Two keys come with this locking system. You are supplied one of the keys and it is located _____. DORS will keep the matching key. If you need to unlock the equipment and you've lost or cannot find your key, contact the Dept. of Information Technology (DoIT) Service Desk at:

service.desk@maryland.gov or 410-697-9700.

Here are some important notes about the equipment:

- The Dell Optiplex computer comes with an internal wireless card, so you have the option of connecting to a network wired or through WiFi;
- The characters on the keyboard are approximately 3 times the size of a normal keyboard making it easier for people with limited vision;
- This system comes with two audio devices, a Sound Bar and a pair of noise canceling headphones. It is highly recommended you use the headphones whenever someone is using one of the screen readers as to not interrupt others in the area. We've also supplied sanitary covers for the headphones which should only be used once then disposed of. If you run out of covers replacements can be ordered on Amazon.com;
- This system comes with two types of pointing devices, a mouse and a large ball trackball. Both pointing devices are attached and can function independently of one another. The Trackball is typically preferred over the mouse by individuals with a hand mobility impairment;
- The printer is a Multi-Function model allowing one to print, scan and copy with essential features such as the automatic document feeder (ADF) and built-in duplexer for automatic two-sided printing;
- The desk is adjustable height primarily used to accommodate people in wheelchairs. The controller to adjust the height is located on the underside of the table on the right.

The computer, monitor and printer all come with a Dell 4-year limited on-site warranty. The Apex Vortex Adjustable height table comes with a warranty that covers 2 years on motor; 5 years on structure.

Report all hardware problems to the DoIT Service Desk at service.desk@maryland.gov or 410-697-9700.

DORS has supplied the equipment listed above. What each AJC is responsible for are:

- Ample space to put the 48 in. X 30 in. table;
- Network connectivity, wired or wireless. If wired the network jack must be located within 10 feet of the table and will not create a tripping hazard;
- An electric outlet;
- A chair;
- Replacement cartridges for the printer which can be ordered directly through Dell;
- Paper;
- Replacement sanitary covers for the headphones.