LOWER SHORE WORKFORCE ALLIANCE

FOUR-YEAR LOCAL PLAN 2024-2028

WORKFORCE INNOVATION AND OPPORTUNITY ACT

This plan outlines the local policies, procedures, and activities facilitated on 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

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GLOSSARY OF TERMS

Frequently Used Acronyms

AEFL	Adult Education and Family Literacy
AEP	Adult Education Program
AJC	American Job Center
ARPA	American Rescue Plan Act
BSD	Basic Skills Deficient
Blueprint	Blueprint for Maryland's Future
CBO	Community Based Organization
DOL	Department of Labor
DORS	Division of Rehabilitation Services
DHR	Department of Human Resources
DSS	Department of Social Services
DVOP	Disabled Veterans Employment Program
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
JVSG	Jobs for Veterans State Grants
LEA	Labor Exchange Administrator
LDSS	Local Department of Social Services
LMI	Labor Market Information
LEP	Limited English Proficiency
LSWA	Lower Shore Workforce Alliance
LVER	Local Veterans Employment Representative
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
OSW	Offshore Wind
RESEA	Reemployment Services and Eligibility Assessment
RFP	Request for Proposal
ROW	Reemployment Opportunities Workshop
RR	Rapid Response
RSA	Resource Sharing Agreement
TAA	Trade Adjustment Assistance
TANF	Temporary Assistance for Needy Families
TCA	Temporary Cash Assistance
TCC	Tri-County Council for the Lower Eastern Shore of Maryland
UI	Unemployment Insurance
WDB	Workforce Development Board
WEX	Work Experience
WFW	Wheels for Work
WIOA	Workforce Innovation and Opportunity Act
WP	Wagner-Peyser

Executive Summary

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 (AEFL), the Wagner-Peyser Act (WP), 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 (2024-2028).

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 183,881 in 2023. The largest city on the shore is Salisbury MD, located in Wicomico County with a population estimate of 33,159. 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 (2023)	24,910	104,800	54,171	6,263,220
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

Provide an analysis of regional economic conditions, including:

- **Existing and emerging in-demand sectors and occupations,**
- **The employment needs of businesses in those sectors and occupations; and**
- **How the LWDB compares to the region and any unique contributors to or differentiating factors from the regional economic conditions and business needs described in your Regional Plan.**

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 Region Definition, Regional Map, Employment Trends, Unemployment Rate, Wage Trends, Cost of Living Index, Industry Snapshot, Occupation Snapshot, Industry Clusters, Education Levels, and Gross Domestic Product. The information comes from the JobsEQ "Economic Overview" report dated February 2025.

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 2 are:

- Strong relationship with the local community college (the primary local provider on the ETPL), 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

Part 1: Aligning Maryland's Strategic Pillars

(A) This section should speak to the Four Core Strategic Pillars below and include your strategy to work with the entities that carry out the core programs to align resources available to the Local Area, to achieve the strategic vision and goals.

The Four Core Strategic Pillars are listed in Section 2-D.

LSWA has identified key industry sectors (Appendix A, Economic Data) and will continue working with employers in those key sectors to address their workforce needs.

Wor-Wic Community College is the primary WIOA-eligible training provider for certifications and licenses physically located in the LWDA. Therefore, Title I Adult and Dislocated Worker participants enroll in Occupational Skills Training programs through the college.

In addition to Wor-Wic Community College, we utilize other funding sources such as ARPA, other philanthropic resources, and On-the-Job training opportunities with local businesses to facilitate training and apprenticeship programs.

LSWA will expand our outreach initiative to community based organizations to recruit disadvantaged and underrepresented individuals and groups to engage in workforce opportunities and to expand the group of qualified applicants.

Through our Young Adult program and the Maryland Blueprint for Education Pilot program, LSWA is working to strengthen our relationship with the area school systems, providing career guidance and exploration.

LSWA is actively braiding and leveraging funding resources and services provided by our partners to maximize impact and efficiency.

(B) This section should include a description of the local area's plan to work with providers to facilitate the development of career pathways, including co-enrollment in core programs and academic training programs when appropriate.

LSWA is working with Wor-Wic Community College, our primary ETPL training provider on the Lower Shore.

(C) Describe how your local area's workforce development programs, including programs provided by partner agencies, support this strategic vision.

As an American Job Center, we work closely with our system partners to coordinate resources, conduct training, and ensure that the programs we offer meet the needs of our workforce community.

(D) Describe how the local area will ensure consistent implementation of activities and services that align with the State's four core strategic pillars:

1. Supercharge Key Sectors

→ **What strategies will you use to map skills and training assets and identify gaps?**

We will use analytic tools such as Chmura and the Delmarva Index to identify in-demand skills needed in the region. Additionally, we have quarterly system partners meetings with our AJC partners to discuss programs and collaborations. We also work closely with our training partners to identify high demand skills training to build a robust workforce in our region.

2. Advance Equity and Access

→ **What steps will you take to apply an equity lens to address labor force participation inequities and gaps?**

We will work with community groups and faith based organizations to ensure participation and workforce inclusion.

→ **How will you expand access to supportive services for job seekers facing barriers to employment and/or training?**

We are looking to increase our supportive services allocation for our Young Adult and Adult programs. We also work with our partners to promote the supportive services that they offer.

→ **What initiatives will you implement to support employers in recruiting, hiring, retaining, and upskilling employees from diverse populations?**

We are currently working with staffing services to market the programs offered through Wor-Wic to reach disadvantaged and diverse communities. We've offered courses to upskill employees both in English and Haitian Creole, and offer online soft skills courses through Metrix Learning to anyone in the three counties.

Accessibility and document translation training for staff members to ensure we meet the needs of targeted populations.

3. Prepare the Future Workforce

→ **What strategies will the LWDB implement to increase participation in Registered Apprenticeships (RA) and the attainment of industry-recognized credentials among high school students?**

We work with Junior Achievement, Maryland Apprenticeship Council, and the 2030 Apprenticeship Commission to reach high school students and young adults in the Lower Shore area. LSWA is a registered Apprenticeship Ambassador with the US Department of Labor Office of Apprenticeship.

4. Improve System Alignment and Accountability

→ **How will the local area, working with the entities that carry out the core programs, align available resources to achieve the strategic vision and goals?**

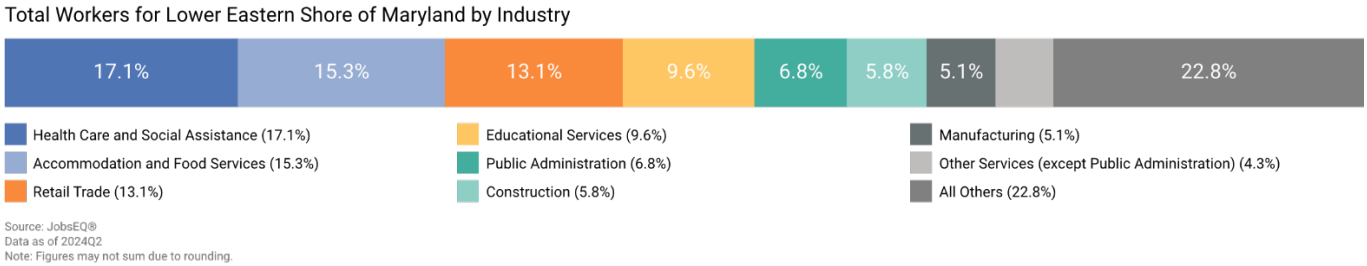
We hold partner meetings on a quarterly basis to ensure productive collaboration and to maximize efficiency.

→ **How will you monitor and evaluate the use of resources to ensure they are contributing to the desired outcomes?**

We submit quarterly reports to our state and federal funding sponsors that ensure compliance, and that strategic goals are achieved.

Part 2: Sector Strategies for Emerging and In-Demand Industries

(A) This section should include an analysis of the knowledge and skills needed to meet the needs of the local businesses, including employment needs in in-demand industry sectors and occupations.



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 2024Q1 with preliminary estimates updated to 2024Q2. Source: JobsEQ®, http://www.chmuraecon.com/jobseq Copyright © 2025 Chmura Economics & Analytics, All Rights Reserved.

The top three industries reflected on this chart show that employer needs lie overwhelmingly in the healthcare, hospitality, and retail occupation groups. We work closely with the leaders in these industries to identify the skills needed and collaborate with our training providers to address these needs. We are continuing to keep up with emerging industries such as Offshore Wind, Broadband, and skilled trades.

(B) This section should include an analysis of the workforce in your 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 your Area, including individuals with barriers to employment.

This information can be found in the Economic Analysis in Appendix A starting on page 70.

**Note: Individuals with barriers to employment, as defined by the WIOA and Maryland include the following:*

- → *Displaced homemakers;*
- → *Eligible migrant and seasonal farm workers;*
- → *Ex-offenders;*
- → *Homeless individuals;*
- → *Individuals facing substantial cultural barriers;*
- → *Individuals with disabilities, including youth with disabilities;*

- → *Individuals within two years of exhausting lifetime eligibility under Part A of the Social Security Act; Individuals who are English language learners;*
- → *Individuals who are unemployed, including the long-term unemployed;*
- → *Individuals who have low levels of literacy;*
- → *Individuals without a high school diploma;*
- → *Low-income individuals, including TANF and SNAP recipients;*
- → *Native Americans, Alaskan Natives, and Native Hawaiians;*
- → *Older individuals;*
- → *Single parents (including single pregnant women and non-custodial parents);*
- → *Veterans; and*
- → *Youth who are in, or have aged out of, the foster care system.*

(C) This section should include an analysis of the workforce development activities (including education and training) in your 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 your 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 Workforce Exchange, located at the AJC, and any individual may utilize the resources available. 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.

Our use of American Rescue Plan Act (ARPA) funding has facilitated certifications, licenses, on-the-job training, and apprenticeships in the following industries: healthcare, senior healthcare, skilled trades (construction, plumbing, welding, HVAC), automotive, manufacturing, and insurance.

WIOA-funded training services are delivered by Lower Shore Workforce Alliance staff. Youth / Young Adult, 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 (ETPL) 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, MD. It is historically the only approved training provider physically located within the Lower Shore Workforce Development Area. Recently, Pohanka Automotive and Vehicles for Change have been added to the ETPL.

Training services will not be the exclusive role of Title I Youth / Young Adult, Adult, and Dislocated Worker. In some instances, the services are those that one or more partner agencies may be assisting with or providing. Youth / Young Adult, Adults, and Dislocated Workers may be co-enrolled across partner programs to leverage resources and expand their options.

The assessment of the type and availability of employment and training activities was conducted through a service mapping exercise performed by the AJC partners. Chmura is a data tool to identify key industry sectors for training needs and workforce support.

One challenge we face is the number of courses and students that Wor-Wic Community College currently can assist in regards to their ETPL programs. The number of courses and slots available are insufficient to meet the current demand of Title I job-seeker customers. Wor-Wic Community College is limited by funding, capacity, and available instructors on the Lower Shore.

(D) This section should describe how your area will align workforce programs, services, and resources to a career pathways model.

→ **How will you identify and focus on sectors such as cybersecurity, healthcare, clean energy, infrastructure, and manufacturing?**

As cybersecurity, healthcare, clean energy, infrastructure, and manufacturing become more in need sectors, we are ready to address and fulfill training needs by working with local employers and the Maryland Workforce Association, which is comprised of 13 workforce development boards across the state of Maryland, to identify workforce needs in the region. We regularly meet with local employers and Local Education Agencies to identify workforce needs and to create talent pipelines. We also work with our State Representatives and Local Economic Development Agencies to advance apprenticeship and workforce development initiatives.

→ **How will you engage with employers to understand their workforce needs and priorities?**

We invite local employers to meet regularly to address their needs and understand their priorities, including: round tables, joining committees, holding outreach events, attending local job fairs, joining local boards and chambers of commerce, attend networking events to connect with new employers, and attending presentations held by Economic Development representatives.

→ **What strategies will you use to collaborate with partners to recruit successful training and apprenticeship program training providers to the ETPL?**

We receive referrals regarding employers and participants as well as invitations for apprenticeship and ETPL discussions from our partners.

→ **What strategies will you use to encourage employers to participate in workforce development initiatives?**

We inform them of our services and the potential positive outcomes.

→ **How will you support employers in developing and implementing on-the-job training programs?**

We have supported key industry sector employers with recruiting and reimbursed 50% of the new employees' salaries for the first six months of employment.

We support employers based on lack of available education in the area. We will continue to do so based on available funding.

SECTION 3: American Job Center Delivery System

(A) List the AJCs in your area, including address and phone numbers. Provide 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 CY25 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.

LSWA has a 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 www.lowershoreajc.org or www.lswa.org.

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

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 Youth / Young Adult, 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 AJC to learn about available programs, eligibility and the enrollment process.
- → The individual meets with the case manager for eligibility determination and development of an Individual Employment Plan (IEP) or an Individual Service Strategy (ISS).

The participant enrolls in and completes occupational skills training.

(C) Describe the process your Board intends to use for the solicitation and selection of a One Stop Operator. (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) Describe how your 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, workers, and jobseekers.

Youth / Young Adult

LSWA currently provides services for Youth / Young Adult in house as of October 2022, and we no longer use sub-grantees.

Eligible Training Provider List

Regarding the 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.

The Board

The Board is represented by 51% employers and provides guidance and direction to LSWAs programmatic initiatives.

(E) Describe how you will facilitate access to services provided through the AJC 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 AJC mobile unit is outfitted with 8 computers at individual workstation areas and a cellular internet connection making it a completely 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) Describe the roles and resource contributions of the AJC partners.

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/policies/

(G) Describe how your Board will use Individualized Training Accounts 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 ETPL.

Training is provided to eligible adults and dislocated workers through the 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) Describe how your 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.

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) Describe how your 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. One role of LSWA's Business Service Manager is to initiate Incumbent Worker Training (IWT) contracts with local businesses. Currently LSWA is using ARPA funds to support IWT and On the Job Training (OJT). ARPA funds have allowed us to serve a wider range of participants across the Lower Shore who are not WIOA eligible. We will return to WIOA and other available funding sources when the ARPA funds close at the end of December 2026.

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) Describe how your 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, Chmura, Metrix, Conover, and National Association of Workforce Development Professionals, and Maryland Workforce Association 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 Boards 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 4: Title I – Adult, Youth, and Dislocated Worker Functions

(A)Describe 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 ETPL through an 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 primary approved training provider physically located within the LWDA. 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 may 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)Describe how your Board will coordinate workforce development activities in the Local Area with statewide rapid response activities. (Section 134(a)(2)(A).

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 Labor Exchange Administrator (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) Provide a description and assessment of the type and availability of youth workforce development activities in your area, including activities for youth who are individuals with disabilities. Include successful models of such youth workforce development.

Youth / Young Adult programs funded by WIOA are provided in house by LSWA as of October 2022. The program was formerly provided by sub-grantees. It is the responsibility of LSWA to: engage in participant recruitment, conduct an objective assessment, develop individual service strategies, meet performance measures, provide case management and maintain appropriate records. LSWA's youth program is responsible for providing access to all fourteen program elements required under WIOA; services may be made available directly by the provider or by a partner via referral.

Multiple programs may be funded under the fourteen elements to ensure that a wide variety of eligible individuals are 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 offered as there is no standard approach that will work for all youth, including youth with disabilities.

(D) Describe how your local area will coordinate education and workforce development activities carried out in your 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. LSWA meets annually with the Program Advisory Committee made up of representatives from the three counties that LSWA serves and the focus of the committee is to monitor and improve CTE curriculum and participates in the Skills USA competition. Additionally, LSWA is one of thirteen workforce development boards engaged in the Blueprint for Maryland's Future initiative. LSWA has a Career Coach Liaison on staff to coordinate with the ten Career

Coaches representing Wicomico, Somerset, and Worcester counties regarding Pillar 3.4 Career Counseling.

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

The American Job Center located in Salisbury serves as 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 the Youth / Young Adult Program training and education. LSWA provides supportive services for the Youth / Young Adult participants for expenses that are necessary to enable an individual to overcome barriers. Reimbursements are made to Adult and Dislocated Worker participants based on need pertaining to training and education.

Costs must be reasonable and be directly associated with supporting the individual to complete a training program. Other costs may qualify at the recommendation of the case manager and upon approval by the LSWA Workforce Director or designee. Whenever possible, linkages will be made to other community services, which may be able to provide financial assistance.

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

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

(H)Describe how your 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. A revised policy is currently being updated and is awaiting approval.

POLICY: SELF-SUFFICIENCY

WIOA Section 134(c)(3)(A) indicates that a justification for training must be determined for each individual entering a training program.

The following criteria must be met in order for training services to be made available to employed or unemployed adults and dislocated workers

1. *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;*
2. *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*
3. *Have skills and qualification to participate successfully in training services.*

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:

- *a) Self-sufficiency is defined as wages of $12.38 per hour. The correlates to 200% of the 2021 HHS Poverty Guidelines for one individual.*
- *b) 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:*
  - *a. above the self-sufficiency definition of $12.38 per hour; or*
  - *b. wages comparable to or higher than wages in previous employment .*
- *c) 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:*
  - *a. above the self-sufficiency definition of $12.38 per hour; or*
  - *b. wages comparable to or higher than wages in current employment .*
- *d) 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)Describe your 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)Describe how your Board will interpret and document eligibility criteria for in-school youth. (Maryland Youth Policy and WIOA Sections 129(a)(1)(B)(iii)(VII) and (a)(1)(C)(iv)(VII)

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

(K)Describe how your Board will interpret and document eligibility criteria for out of school youth. (Maryland Youth Policy and WIOA Sections 129(a)(1)(B)(iii)(VII) and (a)(1)(C)(iv)(VII).

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)Describe the documentation that is 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 (IEP) form.

(M)Describe how your board will provide access to the 14 required program elements for the WIOA Youth program design and whether the Local Board has contracted with youth services provider.

Youth / Young Adult programs are provided in house by LSWA.

A relevant excerpt from the Program Year 2024 Youth / Young Adult Handbook is:

WIOA requires that 14 elements be made available to all participants. Not every participant will receive every service; however, if the individual is in need of one of the elements, then it must be made available. Elements may be directly provided or provided by an external partner. Any elements not directly provided should be monitored by the case manager. Follow up must be provided to all participants. There are two important resources that all staff should review which provide detailed information about program elements: a} pages 14 through 22 of ***TEGL*** *21-16 and b} 20 CFR § 681.480 through§ 681.600 (WIOA Final Rule).*

(N)Describe the steps your Board will take to ensure at least 20% of Youth Funds are used for work-based training activities.

Both the programmatic and fiscal monitoring processes include review for compliance with the work experience requirement.

(O)Describe your board's plan goal to serve out of school youth and identify specific steps that have been taken to meet this goal. If your board's goal is under 75 percent describe how you will implement the waiver and how you will enhance connections to Youth Apprenticeship programming, increase DORS co-enrollment, and make changes for In-School-Youth (ISY) services.

Steps Taken:

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 Out-of-School Youth (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.

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 OSY 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, OSY programs were allocated at 100%.

The local area continues to allocate 100% of WIOA Youth funds to OSY programming. LSWA brought the Youth Program in house in October 2022 and no longer utilizes sub-grantees.

(P)Describe how your Board will provide basic and individualized career services to customers and how services will be coordinated across program/partners in the AJCs.

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 3/18/24.

POLICY: WIOA PARTICIPANT FOLLOW UP PROCEDURES

Purpose

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

Policy

Local areas must provide follow-up services Adult and Dislocated Worker and Youth Program 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.

Youth Program participants must be informed about the minimum 12 month follow up period after their program participation ends during the creation of the Individual Service Strategy process. This information should be recorded in a case note as evidence of the participant's awareness

SECTION 5: Title II – Adult Education and Family Literacy Functions

(A) Describe how your Board will coordinate workforce development activities in your 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.

Local WIOA Title II Adult Education and Family Literacy Act Providers Worcester, Somerset, and Wicomico:

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.

Somerset County Public Schools, Adult Education Contact: 410-651-2285

Somerset County Public Schools provides comprehensive Adult Education services strategically located at both ends of the county, ensuring accessibility for all residents. The administration office is based at Somerset County Technical High School, with classes facilitated in both Princess Anne and Crisfield. Our programs are tailored to meet the diverse needs of our community through the following structured services:

- **Personalized Learner Support:**
    - We conduct thorough intake and comprehensive assessments to determine each individual's educational needs and capabilities. This personalized approach ensures that referrals and placements are finely tuned to each learner's academic abilities and career aspirations.
- **Flexible and Accessible Instructional Offerings:**
    - Our curriculum caters to a wide range of learners, from those at basic educational functioning levels 1 through 6 to advanced learners and English as a Second Language (ESL) participants. We emphasize flexibility and accessibility by offering a blend of face-to-face and virtual blended learning environments. This method accommodates the varied schedules of adult learners and supports those who may need to balance educational pursuits with other responsibilities.
- **Technology-Enhanced Learning:**

- Recognizing the importance of digital literacy in today's job market, we provide academic online self-paced educational programs at no cost. These programs allow students to enhance their learning outside of traditional classroom settings, promoting self-directed learning and continuous skill development.

- **Workforce and Career Development Services:**
  - Our career services are designed to bridge the gap between education and employment. We offer pre-employment planning, career development workshops, and goal-setting sessions to help learners navigate their career paths. This includes providing robust support in resume writing, interview preparation, and job search strategies.
  - We facilitate direct referrals to local employment services and agencies and provide guided access to the Maryland Workforce Exchange, enhancing our learners' ability to find and secure meaningful employment.

By enhancing our services in these ways, Somerset County Public Schools aims to empower adult learners with the skills and knowledge necessary to thrive in the workforce and contribute positively to our community's economic development.

Wicomico Adult Education provided by Wor-Wic Community College, 443-669-6373

Wor-Wic Community College's Adult Education Program provides Maryland High School Diploma options and English for Speakers of Other Languages (ESOL) in Wicomico County; and works with educational and workforce development partners on the Lower Shore to connect students to postsecondary education, employment, and workforce training opportunities.

The following services are provided to adult learners:

- Intake, assessment, and referrals made based on individual's needs and academic ability.
- Offer various modalities of instruction (in-person and virtual) with online supplemental instruction platforms to reinforce literacy skills outside of the classroom experience.
- The National External Diploma Program is an alternative option to obtain the Maryland High School Diploma. The NEDP is an online self-paced portfolio-based program for eligible adults and out-of-school youth who obtain qualifying scores on the Adult Secondary Education literacy level. The NEDP is only offered at Wor-Wic on the Lower Eastern Shore.
- Access college services (i.e., counseling and disability services, career services, food pantry, etc.).
- Network and collaborate with community partners to promote adult education courses to special populations (i.e., homeless, food insecure, returning citizens, at-risk youth, disabled individuals, seniors, immigrants, veterans, etc.).

- Refer students to workforce and career development services at the American Job Center (i.e., cover letter and resume preparation, mock interviews, job fairs, Maryland Workforce Exchange, etc.).

Adult Education services are aligned with the local workforce plan.

(B) Describe how your Board will coordinate efforts with Title II providers to align basic skills and English language assessments and include the following:

→ **An outline of the steps to align basic education skills and English language assessments within you Area, including, but not limited to, any MOU entered into by the workforce development and adult learning partners;**

Currently, all three Adult Education Providers (AEP) use CASAS Steps 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.

The coordination of basic education skills and English language assessments between our workforce development board and adult learning partners is a key component of our strategy to enhance and streamline adult education across the region. To ensure a cohesive approach, we have implemented several key steps:

1. **Standardization of Assessment Tools:**
    - Currently, all three Adult Education Providers (AEPs) utilize the CASAS Reading Life and Work Series for English as a Second Language (ESL) learners and CASAS GOALS for Math and Reading for Adult Basic Education (ABE) and Adult Secondary Education (ASE) learners. Similarly, the American Job Centers (AJC) use CASAS GOALS for Math and Reading. This uniformity in assessment tools across all agencies ensures that we have a consistent metric for evaluating educational outcomes and learner progression.
2. **Memorandum of Understanding (MOU):**
    - We have formalized our collaborative efforts through a Memorandum of Understanding (MOU) entered into by all participating agencies. This MOU outlines the responsibilities of each partner, the protocols for data sharing, assessment scheduling, and result interpretation, ensuring that every partner operates under a unified framework.

→ **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));**

The sharing of assessment scores between WIOA Title I and Title II providers is managed with strict adherence to FERPA guidelines to ensure the privacy and security of all student records. The process is structured as follows:

1. **Designation of Contact Points:**
    - Both Title I and Title II staff will designate and publicly list a specific point of contact responsible for the handling and sharing of assessment scores. These points of contact, typically roles such as Administrator, Coordinator, or Intake Assessment Specialist, are trained in FERPA compliance and data handling protocols.

2. **Release of Records Protocol:**
    - Prior to any data transfer, Adult Education Providers (AEPs) require a signed release of records document. This form must be completed by the student, giving explicit consent for the sharing of their assessment scores with the requesting agency. The form will clearly specify which data can be shared, with whom, and for what purpose.
3. **Data Handling and Privacy Compliance:**
    - All parties involved in the data sharing process are required to adhere to established policies regarding the protection of Personally Identifiable Information (PII). These policies are reviewed regularly to ensure they align with the latest FERPA regulations and best practices in data privacy.
4. **Documentation and Audit Trails:**
    - Every request for and transfer of assessment scores is documented, creating an audit trail that details the movement and access of student data. This documentation includes the date of the request, details of the information shared, and confirmation of consent forms. This audit trail helps in ensuring accountability and traceability of data.
5. **Training and Compliance Monitoring:**
    - Regular training sessions are conducted for all staff involved in data handling to ensure they remain informed about FERPA regulations, data protection practices, and any changes in policy. Compliance monitoring is also implemented to ensure that all data sharing and handling procedures are consistently followed across all involved agencies.

Through these detailed and carefully structured procedures, we ensure the secure and compliant sharing of assessment scores between WIOA Title I and Title II providers, thereby supporting the effective and responsible management of learner information and aiding in their educational and career advancement.

→ **Who will conduct which of the approved assessments (including for Trade Participants) and when will such assessments be conducted, consistent with this policy;**
Assessment administration within our Adult Education Programs (AEPs) is structured to ensure consistency, fairness, and compliance with both Maryland Department of Labor (MD Labor) and local educational agency policies. Here's how we manage the process:

1. **Role of Intake Assessment Specialists:**
    - Intake Assessment Specialists, who are specifically trained in assessment administration and data integrity, are responsible for conducting all initial and concluding assessments for applicants, including those participating in Trade programs. These specialists are equipped with the expertise to ensure that assessments are administered under standardized conditions to maintain reliability and validity.
2. **Timing of Assessments:**

- **Pre-testing:** All new learners, including Trade participants, undergo CASAS pre-testing as part of their managed enrollment and orientation. This initial assessment is scheduled during the first sessions of the program to establish a baseline of each learner's abilities and to tailor educational interventions accordingly.
- **Post-testing:** Subsequent to the educational interventions, students are post-tested to measure their progress and learning outcomes. The timing of post-tests is determined by MD Labor's guidelines, which typically suggest assessment after a set instructional period or upon completion of a program module. This ensures that the assessments are reflective of the educational content delivered and the learning achieved.

3. **Alignment with Policies:**
   - Our assessment procedures strictly adhere to the guidelines set forth by MD Labor's Adult Education policy, which are designed to ensure that all assessments are conducted in a manner that is fair and equitable for all participants. Additionally, our local educational agency policies provide a framework that supports these practices by outlining specific procedural details, such as the environment in which assessments are conducted and the handling of assessment data.
4. **Training and Professional Development:**
   - To maintain high standards in assessment administration, ongoing professional development is provided to Intake Assessment Specialists. This training focuses on updates in assessment tools, techniques for ensuring equitable testing conditions, and strategies for interpreting results effectively.

By detailing these elements, our response emphasizes the rigor and structure of our assessment procedures, underscoring our commitment to delivering high-quality educational services and maintaining compliance with all relevant policies and guidelines.

LSWA staff 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.

→ **How will your area coordinate testing between workforce development and adult education providers; and**

Our area employs a well-defined, collaborative approach to coordinate testing between Adult Education Providers (AEPs) and the American Job Center (AJC), ensuring that all stakeholders work together efficiently to support adult learners. Here's a detailed breakdown of our coordination process:

1. **Unified Testing Instruments:**
   - Both AEPs and the AJC use the CASAS GOALS assessments for Math and Reading to ensure consistency in measuring learner progress. This

commonality of assessment tools helps in maintaining uniformity and accuracy in evaluating the educational outcomes of our adult learners.

2. **Co-Enrollment Procedures:**
    - When an adult learner co-enrolls with the AJC, a streamlined process is activated to share relevant educational records, including pre and post-test scores. This process is initiated only after receiving a signed release of records from the learner, respecting their privacy and complying with the Federal Education Rights and Privacy Act (FERPA).

→ **How will your will ensure that test administrators are trained? (See MD Labor's policy and applicable testing guidelines) (DWDAL's policy on assessments)**

To ensure that all test administrators are fully qualified and adhere to MD Labor's policy and applicable testing guidelines, our approach encompasses several stringent measures:

1. **Certification Requirements:**
    - No staff member, including those at the American Job Centers (AJC) and Adult Education Providers (AEPs), is permitted to administer CASAS assessments without completing the requisite certification process. This process is conducted through the official CASAS organization, ensuring that all administrators are proficient in the latest assessment protocols and ethical testing practices.
2. **Verification and Documentation:**
    - Upon completion of their certification, all test administrators must provide a copy of their CASAS Test Administrator Certification to the Local Workforce Area's (LWA) Deputy Director. This step is crucial for maintaining a verified roster of certified administrators. Additionally, certification details are recorded and maintained in MD Labor's Adult Education and Literacy Services database as well as in each adult education office, ensuring easy access and verification.
3. **Ongoing Professional Development:**
    - To keep test administrators up-to-date with the latest in assessment policies, testing methodologies, and CASAS competencies, we require continuous professional development. This includes annual refresher courses offered by CASAS, participation in workshops, and updates on any changes in testing guidelines or MD Labor's policies. These training sessions are critical for maintaining high standards and ensuring that our administrators remain compliant with all regulatory requirements.

(C)Describe how your 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) Describe how adult education services will be provided in the AJC system within the Local Area.

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.

Adult Education services in Wicomico County are seamlessly integrated into the AJC to provide comprehensive support tailored to the needs of adult learners. Here is how these services are structured and delivered:

1. **Service Availability and Facility Use:**
    - The AJC offers dedicated classroom space for adult education classes during hours that are strategically determined to meet the needs of the local population. This scheduling flexibility ensures that classes are accessible to learners with varying schedules, including working adults.
2. **Intake and Goal Setting:**
    - As part of the intake process, all adult education program participants engage in detailed goal-setting exercises. These goals typically focus on employment and post-secondary educational aspirations. This initial step is crucial for aligning the educational services with the individual's career and educational objectives.
3. **Integration with Workforce Services:**
    - Following goal setting, participants are systematically referred to the Maryland Workforce Exchange for registration. This integration facilitates access to job listings, career counseling, and other workforce development resources. Additionally, participants are directed to the open computer lab within the AJC where they receive assistance with developing essential computer skills such as keyboarding, which are vital for both educational and professional success.
4. **Referral and Support Services:**
    - If any barriers to education or employment are identified during the intake or ongoing support processes, participants are referred to appropriate local

resources. This includes partnerships with Telamon, the Department of Social Services, and other agencies specializing in addressing specific needs such as housing, childcare, transportation, or mental health services.

5. **Accessibility Across Counties:**
    - While classroom-based adult education services are not available in the AJC locations of Worcester and Somerset counties due to logistical reasons, efforts are made to ensure residents from these counties have access to necessary information and services. AJC staff provides contact details for the nearest adult education providers and facilitates the initial connection.
6. **Mobile AJC and Outreach:**
    - Information about adult education providers across all three counties is also made available through the Mobile AJC. This initiative extends our reach beyond fixed locations, bringing services closer to potential learners and ensuring that information and support are accessible even in more remote areas.
7. **Continuous Improvement and Feedback:**
    - We regularly evaluate the effectiveness of our adult education services through learner feedback, success rates in achieving educational and employment goals, and community engagement metrics. This ongoing evaluation helps us to continuously improve our services and ensure they remain responsive to the needs of our community.

By implementing these strategies, we aim to provide a comprehensive and accessible adult education service within the AJC system, supporting adult learners in achieving their educational and professional goals while addressing any barriers they may encounter along their journey.

(E) Describe how adult education providers in your Area will use the Integrated English Literacy and Civics Education (IELCE) program 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. If there are no IELCE providers in your area, the response should note how the area refers to job seekers looking for IELCE services. (See WIOA Section 243(a))

Local Adult Education partners do not provide IELCE services.

SECTION 6: Title III – Wagner-Peyser Functions

(A) Describe your plans and strategies for maximizing the 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 your Area through the 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 Regional Reemployment Program Director 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, 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 available online 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, business incentives, labor relations, and more.

Re-Entry Navigator

- The main purpose of this position is to develop and administer connections between American Job Centers, businesses, and correctional facilities for an assigned geographical area to produce a credentialed, skilled workforce benefiting workers and employers.

Business Services

- Provides information on basic business services, take job orders and referrals from businesses.
- Works with businesses to create MWE workforce accounts.
- Enter job orders into MWE according to employer specifications.
- Assists employers in filling jobs.
- Facilitates the match between job seekers and employers.
- Provides guidance with composition and meeting requirements for local foreign labor job orders.

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, benchmarks, etc.)
- Rapid Response activities.

WIOA Title I 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 agencies' 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 allow the ability of data sharing and 2) technology.

(B) Describe how your Board will coordinate with the Wagner-Peyser program to provide migrant and seasonal farm workers in its Local Area will be provided employment services.

Title III Wagner-Peyser staff works closely 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 AJCs.
- 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.
- Ensuring that all legal protections are afforded to farmworkers and that their complaints are promptly resolved.

(C) Explain who is responsible for conducting migrant and seasonal farmworker housing inspections

MD Labor conducts housing inspections for Migrant and Seasonal Farmworkers. 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.

SECTION 7: Title IV – Vocational Rehabilitation Functions

(A) Describe the cooperative agreements that have been replicated between your Board or other local entities and the local office of a designated State agency or unit administering programs under Title I of the Act. Explain your efforts to improve services may include cross-training of staff, technical assistance, information sharing, cooperative work with employers, and other collaborative and coordinated initiatives. (Rehabilitation Act, 29 U.S.C. 721(a)(11)(B), 29 U.S.C. 720 et seq., 29 U.S.C. 732, 741).

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 jobseekers.
- 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 Plan for Employment.
- Provide guidance and counseling, physical restoration, and training to eligible persons with disabilities.
- Provide follow-up services to enhance job retention.
- Provide other vocational 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) Describe how individuals with disabilities will be served through the AJC system in the Local Area.

DORS will serve individuals with disabilities who are both eligible to receive services and who meet the Division's Order of Selection criteria. For those individuals who do not meet DORS Order of Selection criteria and subsequently are placed on a waiting list for services, referrals to partners will be coordinated to ensure connection to appropriate resources. As outlined in the Resource Sharing Agreement (RSA), DORS will contribute to space at the Lower Shore American Job Center as well as to an accessible workstation housed at the job center. The current workforce service delivery processes will continue to be monitored and amended as appropriate to ensure efficiency and that all information and services are accessible to

individuals with disabilities. DORS will provide cross-training, including Disability Awareness, to partners as part of planned local convenings and training that include all front-line staff within the Lower Shore Workforce Alliance.

SECTION 8: Temporary Assistance for Needy Families Functions

(A) Describe 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 (LDSS). 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)Describe your 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 LWDA, 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 training and providing 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.
- **Ensuring 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.
- **Contributing and providing 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) Describe the LDSS representation on the Local Board to ensure that TANF expectations, roles, and responsibilities are addressed in the Local Area.

The Somerset 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)Describe what strategies your 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 9: Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)

(A)Describe the process the local WIOA partners utilize, or plan to utilize, to support SNAP work registrants in accessing available support and workforce development programs and how many SNAP work registrants currently exist in your area.

The LDSS will describe services offered by WIOA partners and provide interested SNAP customers with the contact information for enrollment in their services. The LDSS will also encourage customers to register with the MWE to explore available training opportunities, workshops, and other supportive services. WIOA partners continue to collaborate on familiarizing each other with the services offered and refining referral processes.

(B) List the available SNAP E&T third party partners in your local area and describe how the third-party partners are being engaged to ensure they are aware of all workforce development programs available in the WIOA system, streamline resources, and prevent duplication of services.

Goodwill Industries of the Chesapeake and Bugg Hardnett Associates are the local third party partners in the Lower Eastern Shore Region. At this time Somerset, Wicomico, Worcester are engaging these partners to establish an efficient and effective referral system for SNAP candidates interested in employment and training support.

SECTION 10: Community Services Block Grant Functions

(A)List the Community Service Block Grant (CSBG) providers in your service area and whether they provide employment and training activities.

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)Describe your implementation and coordination process to enhance the provision of workforce development services for individuals receiving CSBG-supported services 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 training and providing technical assistance to all WIOA Partners about CSBG;**
  SHORE UP! is invited to participate in all AJC partnership cross-training events.
- **Ensuring 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)Describe the CAA representation on your Board to ensure that CSBG expectations, roles, and responsibilities are addressed in the Local Area. (Refer to GWDB's Local Board certification policy)

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

SECTION 11: Jobs for Veterans State Grants Functions

(A) Describe how your Board will provide priority of service to veterans and their eligible spouses.

In accordance with Title 38, United States Code, Chapter 41 and with VPL 05-24, every person seeking services is asked if they have served in the US Armed Forces. Anyone who answers yes to the question "Have you served in the US Armed Forces?" is asked to complete a Qualification Questionnaire. Upon completion of the questionnaire, the veteran is asked to enter their information into the Maryland Workforce Exchange system. Once completed, case management is explained to those veterans and eligible spouses, and they are afforded the opportunity to accept or decline case management. Those who accept case management are assigned to a Disabled Veterans Employment Program (DVOP) representative on the Workforce Development Veterans Team. Those who decline or are not eligible for Case Management Services are given priority of service and assisted or referred to the appropriate partner for services ahead of all who are not eligible for Priority of Service.

(B) Describe how your Board will engage Local Veterans Employment Representatives in engaging and providing services to local businesses.

In accordance with Title 38, United States Code, Chapter 41 and with VPL 05-24, LVERs conduct outreach to the employer community and facilitate employment, training, and placement services under the state's employment service delivery system. Local Veterans Employment Representatives (LVER) should advocate for all veterans and the additional populations described in Section VI.A.2. of VPL 05-24 with business, industry, and other community-based organizations by participating in appropriate activities.

SECTION 12: Trade Adjustment Assistance for Workers Program Functions

(A) Describe how Trade Adjustment Assistance (TAA) services will be provided in the AJC system within your 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.).
- Assist with Rapid Response activities. AJC Partners participate as appropriate during Trade Rapid Response events.

(B) Describe how Title I staff will provide the TAA services listed above in an integrated manner.

- 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 assisting Rapid Response service, if not already provided and to make the participants aware of all the available services and allowances that the TAA 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) Describe how Trade participants will be co-enrolled in other programs.

- 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 20 CFR 618.325(a)(1): A State must co-enroll trade-affected workers who are eligible for WIOA's dislocated worker program. Workers may choose to decline co-enrollment in WIOA. A State cannot deny such a worker benefits or services under the TAA Program solely for declining co-enrollment in WIOA.

SECTION 13: Unemployment Insurance Functions

(A) Describe how WIOA Title I and Title III partners will support Unemployment Insurance claimants and provide meaningful access 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.

- 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.
- Claimants who have not returned to work within five weeks of the RESEA workshop will attend a follow-up Subsequent RESEA session to reassess their work search progress. This session is scheduled approximately five weeks from their initial workshop.
- 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) Describe how your 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.

There is no longer a SCSEP provider in the local area. It was previously operated by MAC, Inc.

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

(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.

There is no longer a SCSEP provider in the local area. It was previously operated by MAC, Inc.

SECTION 15: WIOA Section 188 and Equal Opportunity Functions

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

The local Equal Opportunity Officer is:

John J. Donegan III, Administrative Services Director
Tri-County Council for the Lower Eastern Shore of Maryland
31901 Tri-County Way, Suite 201
Salisbury, MD 21804
Phone: 410-341-8980
TTY: Users call via Maryland Relay Service 7-1-1
Email: jdonegan@tcclesmd.org

(B) Explain how AJC operators and partners will ensure physical and programmatic accessibility for individuals with disabilities and Limited English Proficiency. Include plans for staff training and support to address these needs. (See WIOA Section 188, 29 CFR Part 38, and the Americans with Disabilities Act)

The AJC 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) Provide an acknowledgment that the Local Board understands that, while Section 188 of WIOA and 29 CFR Part 38 ensures 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, which 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:

- 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) Describe your Board's procedure for handling grievances and complaints from participants and other interested parties affected by the local AJC system, including partners and service providers. (29 CFR 38.69-97) Provide a separate description for the following:

- **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) Describe 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) Describe your Board's policy on providing aid, benefits, services, training, and employment, including assurance of reasonable accommodation for qualified individuals with disabilities unless it poses undue hardship.

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

(H) Describe how your Board will comply with the Americans with Disabilities Act, including providing reasonable accommodation for materials, technology, and facility accessibility. Also, outline how staff will be trained and supported in addressing the needs of individuals with disabilities.

The AJC 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) Describe your Board's policy and strategy to ensure effective communication with individuals with disabilities, including those with visual or hearing impairments, equal to that 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) Describe how your Board will meet the language needs of individuals with Limited English Proficiency who seek services or information. Include how your Board will disseminate information to individuals with Limited English Proficiency, including using oral interpretation and written translation services. (See the Maryland Anti-Discrimination law, including 5 MD. STATE GOVERNMENT Code Ann. §10-1101)

- 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) Provide an identification of the entity responsible for the disbursal of grant funds as determined by the chief elected official or the Governor. (WIOA Section 107(d)(12)(B)(i)(III) and 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.

31901 Tri-County Way, Ste. 201
Salisbury, MD 21804
410-341-8980

(B) Describe the financial sustainability of the AJC services with current funding levels, and a description of the ability to adjust 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 primarily contribute 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) Describe the competitive process used to award the subgrants and contracts in your Area for activities carried out under this title, including risk assessment of potential subgrantees 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) Describe your strategy to become or remain a high-performing board. Describe of the process used by your Board to review and evaluate performance of the local AJC(s) and the One-Stop Operator.

The Workforce Development Board (WDB) 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 contract is monitored by the LSWA Director for compliance, and will report to the WDB as directed by the WDB. The review of the annual report by the One-Stop Operator is a key factor.

(E) Describe you Area's Individual Training Account policy. Include information such as selection process, dollar limits, duration. (WIOA Section 101(d)(6))

The ITA Policy was approved at the June 8, 2022 WDB meeting:

Purpose

To outline the policy for the use of Individual Training Accounts for WIOA training participants.

Policy

The primary method by which Adult and Dislocated Workers and Youth Program participants 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 Department of Labor Licensing and Regulation 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 (i.e. mileage, lodging, meals, etc.) will not be covered.

Online Courses

WIOA allows online and "blended" (combination in-person and online instruction) courses to be considered for addition to the ETPL. These courses can be approved for individuals in the same manner as classroom-only courses listed: interview, assessment, and development of an Individual Employment Plan will determine the suitability of the course for the individual.

(F) Describe how training services will be provided, including the coordination of training contracts with individual training accounts, and how your Board ensures informed customer choice in selecting training programs, regardless of the service delivery method. (Chapter 3 of Subtitle B, Section 134(c)(3)(G))

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, and the listings are on the LSWA.org website.

(G) Describe how the AJCs is 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 AJC 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) Describe your Board's process for conducting oversight and monitoring of its WIOA activities and those of its subgrantee and contractors.

LSWA is not using Sub-grantees at this time.

(I) Describe your Board's policy and procedures for safeguarding and handling personally identifiable and confidential information (ex., physical and electronic files), including the incident response plan for loss of records

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) Describe your Board's procurement system, and how you will assure your procedures meet the standards in USDOL regulations. Include details on how your Board would award emergency contracts when current contracts have been eliminated for just cause. (See 29 CFR Part 95, Part 97 and 2 CFR 200)

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:

LOWER 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) Describe your process to document and demonstrate that the acquisition, management, and disposition of property adhere to the Property Management Procedures. (USDOL 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) Describe your policies and procedures for avoiding 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:

<u>Workforce Development Board – Conflict of Interest</u>

A 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) Describe your Board or fiscal agent's accounting procedures, including the procedures used in preparing reports to 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 Services Director 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) List the key staff who will be working with WIOA funds.

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

- TCC Executive Director
- TCC Administrative Services Director
- Financial Administrator - AR/Banking/Grants Management
- Financial Administrator - Payroll/Procurement/Grants Management
- Staff Accountant - AP/Data Entry/Document Management

<u>LSWA</u>

- Director

- Deputy Director
- Administrative Specialist
- WIOA Program Manager

(O) Describe how your 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 USDOL 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 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 2016. 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 via a third-party payroll processing company. The Payroll Specialist reviews paychecks for accuracy and approves payment. Paychecks are created and delivered to the Payroll Specialist for distribution while direct deposit payments/check stubs are available to view online.

- **Participant payroll system**
  WEX Participants currently participate in activities requiring TCC payroll payments.
- **Participant stipend payment system**
  Stipends have been replaced by contractual employment with LSWA.

(Q) Describe your Board's (or fiscal agent's) cash management system and how you will assure 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 Financial Administrator will be in charge of cash management.

(R) Describe your Board's cost allocation procedures including:

- **Identification of different cost pools.**
- **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. Beginning in FY26, TCC/LSWA will use the de minimis rate to charge administrative costs.

- **Description of funds included in each cost pool**
  There are currently three 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
  3. Youth Cost Pool, allocated to Youth funding

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

- **Description of cost allocation plans for AJCs.**

The cost allocation plan for the AJC is described in the RSA each year. Each agreement describes 1) in-kind contributions, and 2) a shared "cash" contribution.

(S) Describe your 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.

ATTACHMENT A: Economic Overview

Economic Overview

Lower Eastern Shore of Maryland

Region Definition

Lower Eastern Shore of Maryland is defined as the following counties:

Somerset County, Maryland

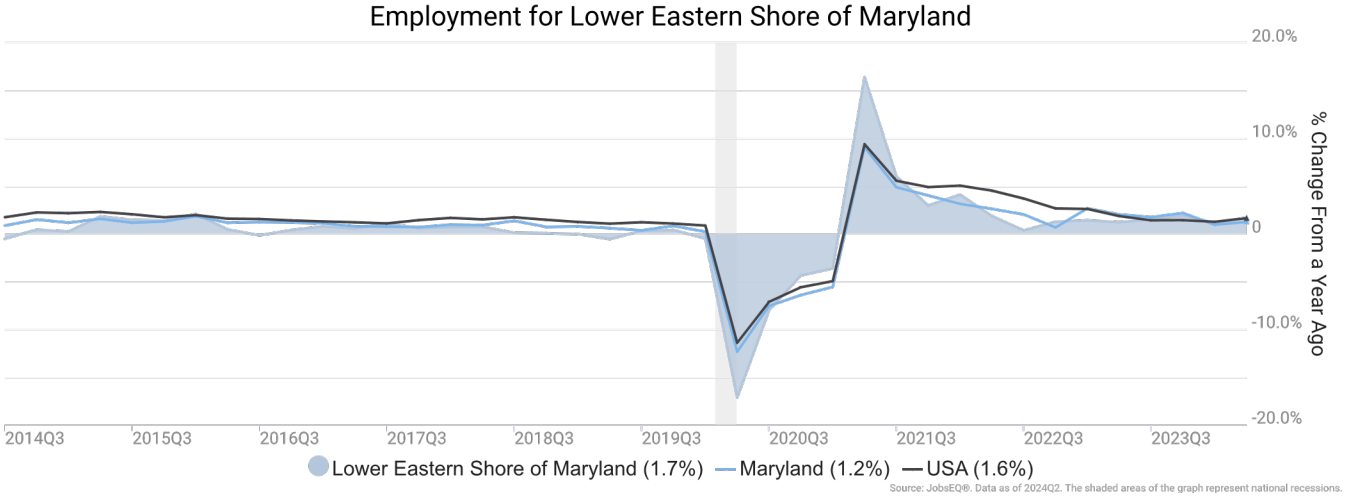
Wicomico County, Maryland

Worcester County, Maryland

Lower Eastern Shore of Maryland Regional Map

Employment Trends

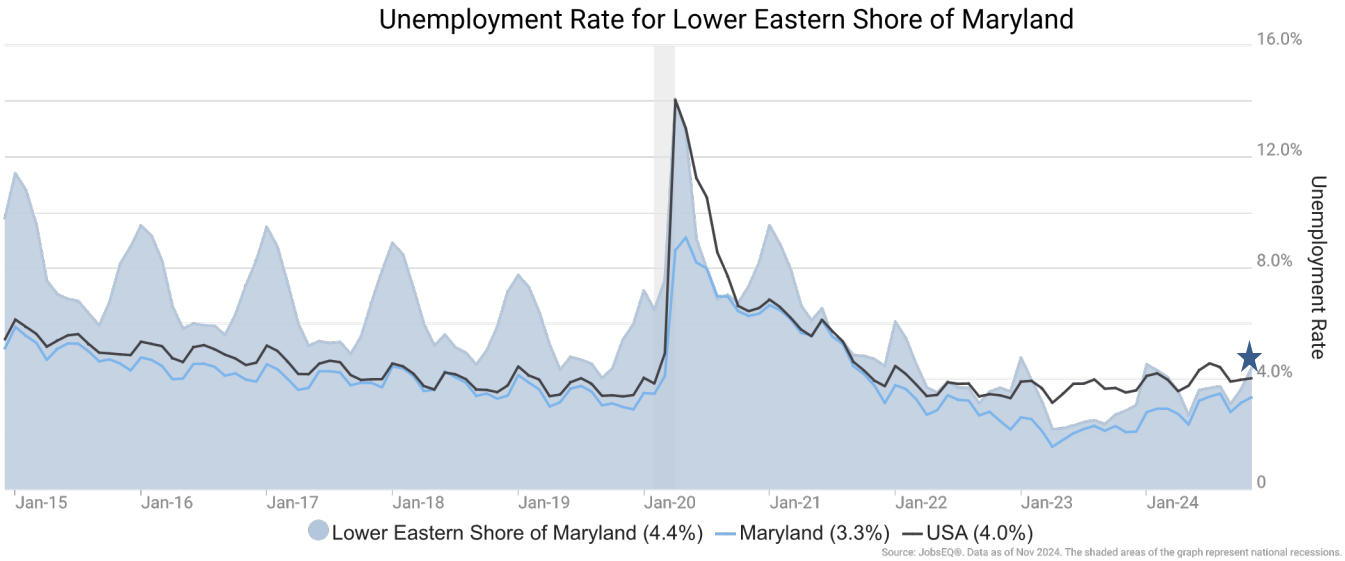
As of 2024Q2, total employment for the Lower Eastern Shore of Maryland was 83,666 (based on a four-quarter moving average). Over the year ending 2024Q2, employment increased 1.7% in the region.



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 2024Q1 with preliminary estimates updated to 2024Q2.

Unemployment Rate

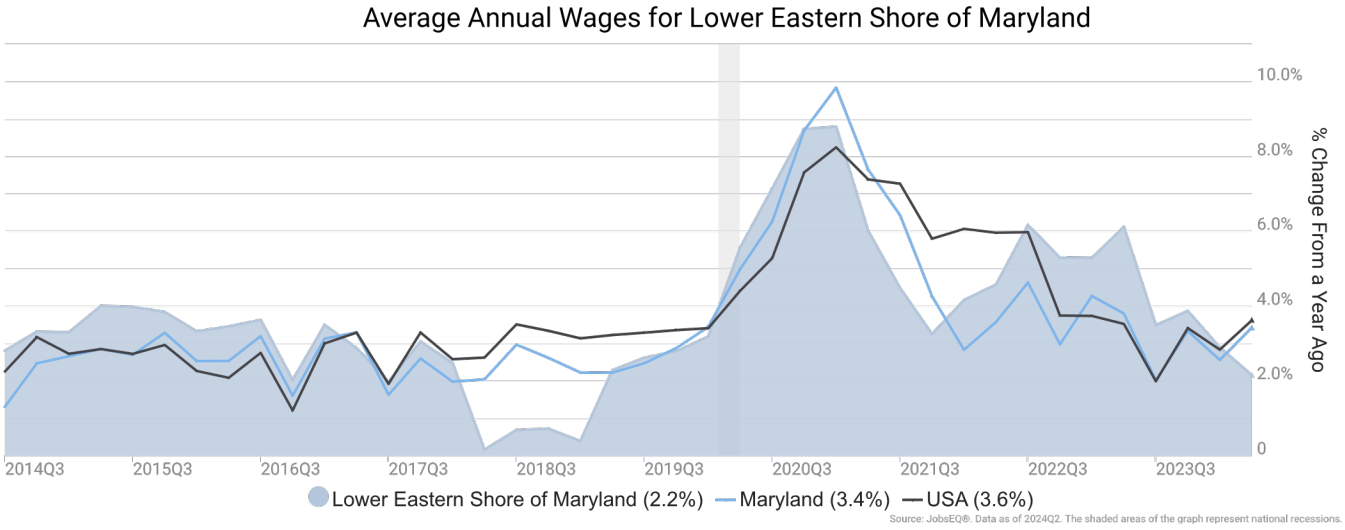
The unemployment rate for the Lower Eastern Shore of Maryland was 4.4% as of November 2024 (as indicated by the star). The regional unemployment rate was higher than the national rate of 4.0%. One year earlier, in November 2023, the unemployment rate in the Lower Eastern Shore of Maryland was 2.8%.



Unemployment rate data are from the Local Area Unemployment Statistics, provided by the Bureau of Labor Statistics and updated through November 2024.

Wage Trends

The average worker in the Lower Eastern Shore of Maryland earned annual wages of $52,091 as of 2024Q2. Average annual wages per worker increased 2.2% in the region over the preceding four quarters. For comparison purposes, annual average wages were $72,405 in the nation as of 2024Q2.



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 2024Q1 with preliminary estimates updated to 2024Q2.

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 3.2% higher in the Lower Eastern Shore of Maryland than the U.S. average.

Cost of Living Information

	Annual Average Salary	Cost of Living Index (Base US)	US Purchasing Power
Lower Eastern Shore of Maryland	$52,091	103.2	$50,473
Maryland	$75,706	113.7	$66,584
USA	$72,405	100.0	$72,405

Source: JobsEQ®

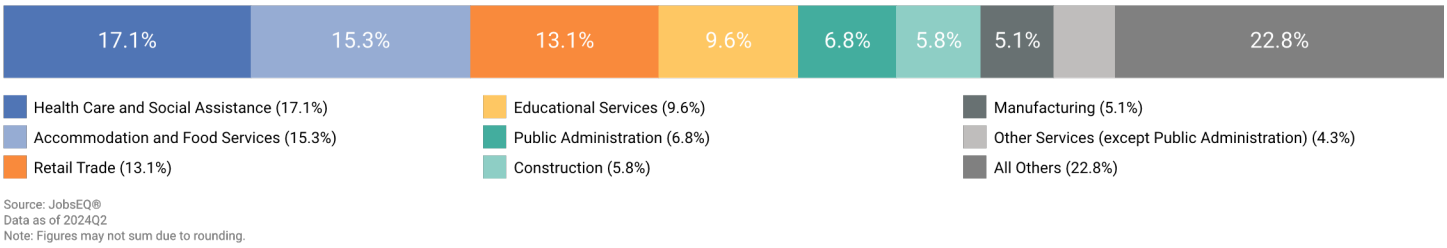
Data as of 2024Q2

Cost of Living per COLI, data as of 2024Q3, imputed by Chmura where necessary.

Industry Snapshot

The largest sector in the Lower Eastern Shore of Maryland is Health Care and Social Assistance, employing 14,340 workers. The next-largest sectors in the region are Accommodation and Food Services (12,811 workers) and Retail Trade (10,945). 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 = 1.76), Public Administration (1.47), and Retail Trade (1.33).

Total Workers for Lower Eastern Shore of Maryland by Industry



Source: JobsEQ®
Data as of 2024Q2
Note: Figures may not sum due to rounding.

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 2024Q1 with preliminary estimates updated to 2024Q2.

Industry Sectors in the Lower Eastern Shore of Maryland with the highest average wages per worker are Management of Companies and Enterprises ($185,040), Utilities ($119,825), and Agriculture, Forestry, Fishing and Hunting ($102,287). Regional sectors with the best job growth (or most moderate job losses) over the last 5 years are Public Administration (+572 jobs), Educational Services (+418), and Wholesale Trade (+249).

Over the next 1 year, employment in the Lower Eastern Shore of Maryland is projected to expand by 169 jobs. The fastest growing sector in the region is expected to be Utilities 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 (+91 jobs), Accommodation and Food Services (+33), and Educational Services (+17).

Lower Eastern Shore of Maryland, 2024Q2[1]

		Current			5-Year History			1-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	14,340	$65,321	1.15	166	0.2%	1,488	637	761	91	0.6%
72	Accommodation and Food Services	12,811	$29,375	1.76	88	0.1%	2,308	969	1,306	33	0.3%
44	Retail Trade	10,945	$36,430	1.33	125	0.2%	1,438	626	865	-53	-0.5%
61	Educational Services	8,065	$61,599	1.20	418	1.1%	772	342	413	17	0.2%
92	Public Administration	5,723	$59,075	1.47	572	2.1%	525	210	314	2	0.0%
23	Construction	4,880	$54,793	0.98	18	0.1%	431	154	263	14	0.3%
31	Manufacturing	4,269	$54,726	0.64	242	1.2%	437	158	272	7	0.2%
81	Other Services (except Public Administration)	3,561	$36,624	1.01	-135	-0.7%	415	165	239	11	0.3%
56	Administrative and Support and Waste Management and Remediation Services	3,521	$44,284	0.69	65	0.4%	407	160	240	7	0.2%
54	Professional, Scientific, and Technical Services	2,904	$66,844	0.48	132	0.9%	249	87	147	15	0.5%
42	Wholesale Trade	2,485	$65,015	0.79	249	2.1%	249	92	155	1	0.1%
71	Arts, Entertainment, and Recreation	1,997	$30,326	1.17	-108	-1.1%	300	117	177	6	0.3%
48	Transportation and Warehousing	1,945	$54,786	0.47	-92	-0.9%	215	85	125	4	0.2%
53	Real Estate and Rental and Leasing	1,650	$53,925	1.11	-50	-0.6%	159	70	88	1	0.1%
52	Finance and Insurance	1,483	$79,286	0.45	-257	-3.1%	124	47	75	1	0.1%
11	Agriculture, Forestry, Fishing and Hunting	1,080	$102,287	1.05	-13	-0.2%	130	62	70	-3	-0.2%
55	Management of Companies and Enterprises	848	$185,040	0.65	-76	-1.7%	76	27	45	4	0.5%
51	Information	755	$55,947	0.46	-139	-3.3%	67	24	42	2	0.2%
22	Utilities	387	$119,825	0.89	-186	-7.5%	36	13	21	3	0.7%
21	Mining, Quarrying, and Oil and Gas Extraction	9	$41,101	0.03	-2	-4.5%	1	0	1	0	0.3%
99	Unclassified	9	$56,226	0.06	9	n/a	1	0	1	0	0.2%
	Total - All Industries	**83,666**	**$52,091**	**1.00**	**1,026**	**0.2%**	**9,244**	**3,735**	**5,340**	**169**	**0.2%**

Source: JobsEQ®

Data as of 2024Q2

Note: Figures may not sum due to rounding.

1. All data based upon a four-quarter moving average

Exits and transfers are approximate estimates based upon occupation separation rates.

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 2024Q1 with preliminary estimates updated to 2024Q2. Forecast employment growth uses national projections adapted for regional growth patterns.

Occupation Snapshot

The largest major occupation group in the Lower Eastern Shore of Maryland is Food Preparation and Serving Related Occupations, employing 10,669 workers. The next-largest occupation groups in the region are Office and Administrative Support Occupations (9,242 workers), followed by Sales and Related Occupations (7,975). 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 = 1.55), Protective Service Occupations (LQ = 1.27), and Building and Grounds Cleaning and Maintenance Occupations (LQ = 1.21).

Occupation groups in the Lower Eastern Shore of Maryland with the highest average wages per worker are Management Occupations ($117,700), Legal Occupations ($110,000), and Healthcare Practitioners / Technical Occupations ($106,700). The unemployment rate in the region varied among the major groups from 0.8% among Legal Occupations to 5.0% among Food Preparation and Serving Related Occupations.

Over the next year, the fastest growing occupation group in the Lower Eastern Shore of Maryland is expected to be Healthcare Support Occupations with a +0.9% year-over-year rate of growth. The strongest forecast by number of jobs over this period is expected for Healthcare Support Occupations (+35 jobs) and Healthcare Practitioners and Technical Occupations (+34). 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 (2,028 jobs) and Sales and Related Occupations (1,069).

Lower Eastern Shore of Maryland, 2024Q2[1]

		Current						5-Year History		1-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
35-0000	Food Preparation and Serving Related	10,669	$35,200	1.55	539	5.0%	366	270	0.5%	2,055	867	1,161	28	0.3%
43-0000	Office and Administrative Support	9,242	$45,200	0.95	284	2.7%	347	-596	-1.2%	970	440	576	-46	-0.5%
41-0000	Sales and Related	7,975	$45,000	1.09	354	4.1%	744	-241	-0.6%	1,028	465	604	-40	-0.5%
11-0000	Management	6,876	$117,700	1.06	107	1.5%	502	676	2.1%	580	191	356	33	0.5%
53-0000	Transportation and Material Moving	5,776	$44,700	0.80	339	5.0%	287	279	1.0%	757	291	449	18	0.3%
29-0000	Healthcare Practitioners and Technical	5,762	$106,700	1.16	70	1.2%	1,656	565	2.1%	348	162	153	34	0.6%
25-0000	Educational Instruction and Library	5,079	$65,200	1.12	107	2.2%	222	343	1.4%	466	210	240	16	0.3%
13-0000	Business and Financial Operations	4,176	$78,700	0.78	97	2.1%	174	268	1.3%	354	117	220	17	0.4%
31-0000	Healthcare Support	3,826	$38,400	0.99	124	2.9%	234	-331	-1.6%	565	235	295	35	0.9%
47-0000	Construction and Extraction	3,338	$53,900	0.89	154	4.2%	74	-87	-0.5%	292	103	177	12	0.4%
37-0000	Building and Grounds Cleaning and Maintenance	3,326	$37,100	1.21	152	4.3%	112	-163	-1.0%	451	198	249	4	0.1%
49-0000	Installation, Maintenance, and Repair	3,276	$54,500	1.01	84	2.3%	233	8	0.0%	301	118	170	13	0.4%
51-0000	Production	2,687	$43,500	0.59	132	3.7%	115	43	0.3%	295	114	185	-5	-0.2%
39-0000	Personal Care and Service	2,411	$38,300	1.12	99	3.6%	91	-156	-1.2%	433	158	264	12	0.5%
33-0000	Protective Service	2,271	$63,000	1.27	62	2.5%	80	180	1.7%	238	100	139	-2	-0.1%
21-0000	Community and Social Service	1,692	$55,600	1.10	46	3.0%	189	-23	-0.3%	166	63	89	13	0.8%

Lower Eastern Shore of Maryland, 2024Q2[1]

		Current						5-Year History		1-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
15-0000	Computer and Mathematical	1,675	$98,600	0.63	36	1.8%	133	85	1.0%	109	37	61	11	0.7%
27-0000	Arts, Design, Entertainment, Sports, and Media	1,123	$62,600	0.74	37	3.2%	83	-33	-0.6%	110	44	64	2	0.2%
19-0000	Life, Physical, and Social Science	825	$73,200	1.08	15	1.9%	57	26	0.6%	72	13	54	4	0.5%
17-0000	Architecture and Engineering	726	$88,800	0.55	14	1.8%	67	-59	-1.5%	53	18	30	5	0.7%
45-0000	Farming, Fishing, and Forestry	484	$39,300	0.99	22	4.6%	7	-16	-0.6%	71	29	43	-1	-0.3%
23-0000	Legal	451	$110,000	0.65	4	0.8%	15	-14	-0.6%	26	11	14	1	0.2%
	Total - All Occupations	**83,666**	**$59,800**	**1.00**	**2,877**	**3.2%**	**5,788**	**1,026**	**0.2%**	**9,745**	**3,983**	**5,592**	**169**	**0.2%**

Source: JobsEQ®

Data as of 2024Q2 unless noted otherwise

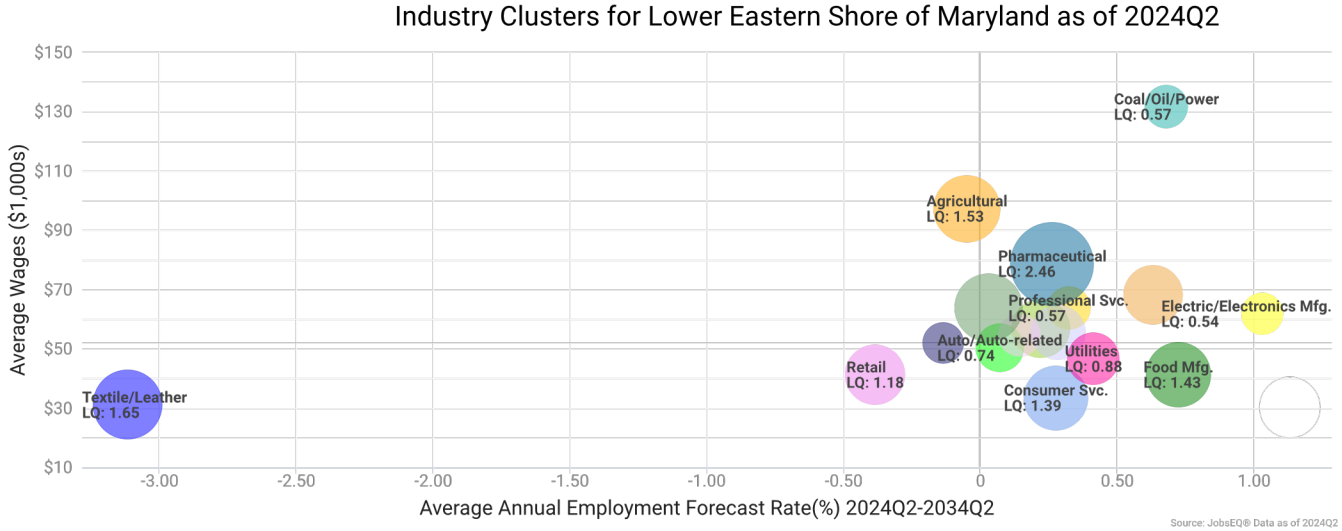
Note: Figures may not sum due to rounding.

1. Data based on a four-quarter moving average unless noted otherwise.
2. Wage data represent the average for all Covered Employment
3. Data represent found online ads active within the last thirty days in the selected region. 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). Ad counts for ZCTA-based regions are estimates.

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 2024Q1, imputed where necessary with preliminary estimates updated to 2024Q2. Wages by occupation are as of 2024 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

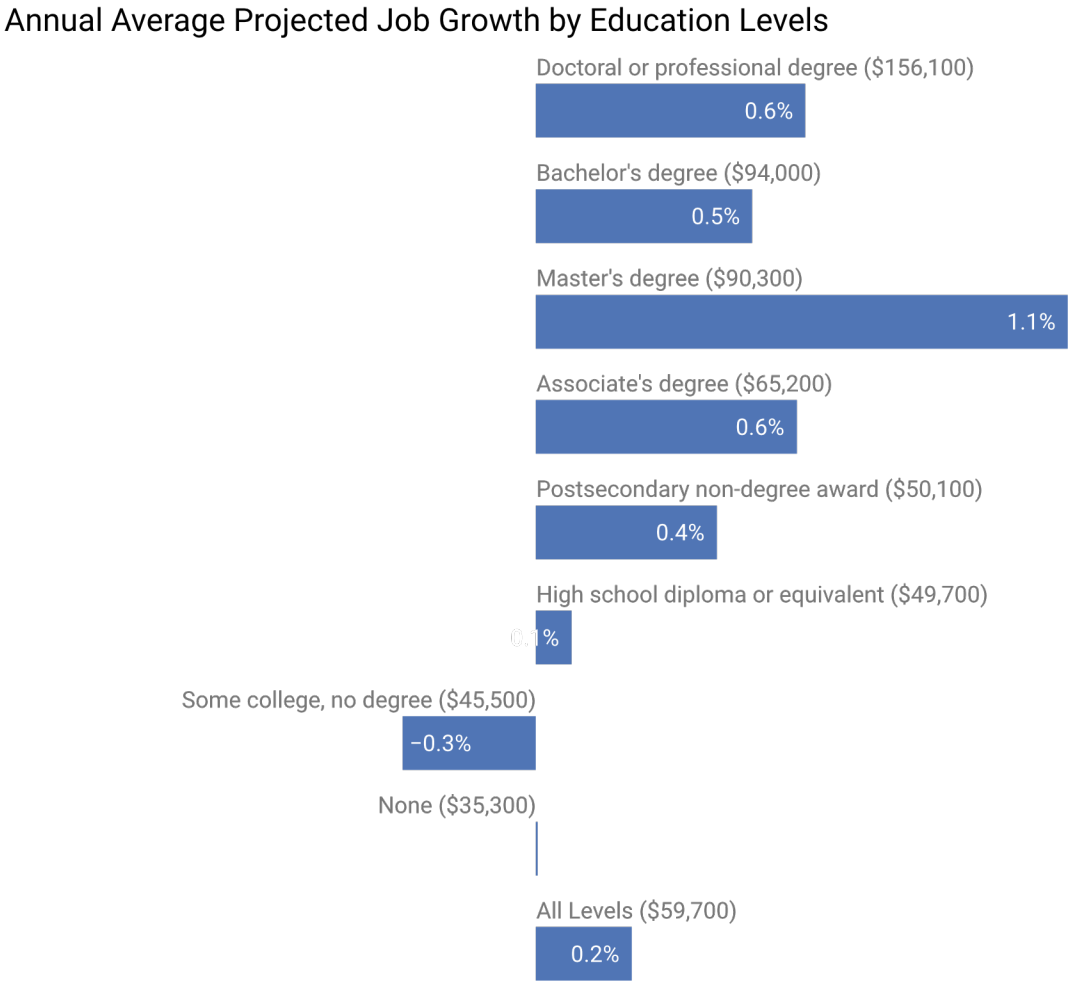
Industry clusters are a geographic concentration of interrelated industries or occupations. The industry cluster in the Lower Eastern Shore of Maryland with the highest relative concentration is Pharmaceutical with a LQ of 2.46. This cluster employs 433 workers in the region with an average wage of $78,649. Employment in the Pharmaceutical cluster is projected to expand in the region about 0.3% 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 2024Q1 with preliminary estimates updated to 2024Q2. Forecast employment growth uses national projections from the Bureau of Labor Statistics adapted for regional growth patterns.

Education Levels

Expected growth rates for occupations vary by the education and training required. While all employment in the Lower Eastern Shore of Maryland is projected to grow 0.2% over the next ten years, occupations typically requiring a postgraduate degree are expected to grow 0.6% per year, those requiring a bachelor's degree are forecast to grow 0.5% per year, and occupations typically needing a 2-year degree or certificate are expected to grow 0.6% per year.

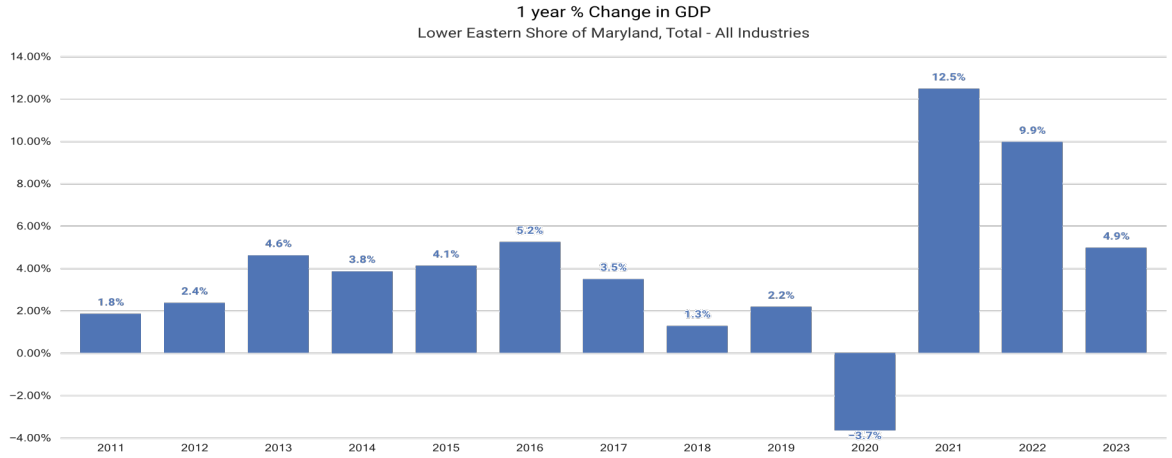


Source: JobsEQ®
Data as of 2024Q2

Employment by occupation data are estimates are as of 2024Q2. Education levels of occupations are based on BLS assignments. Forecast employment growth uses national projections from the Bureau of Labor Statistics adapted for regional growth patterns.

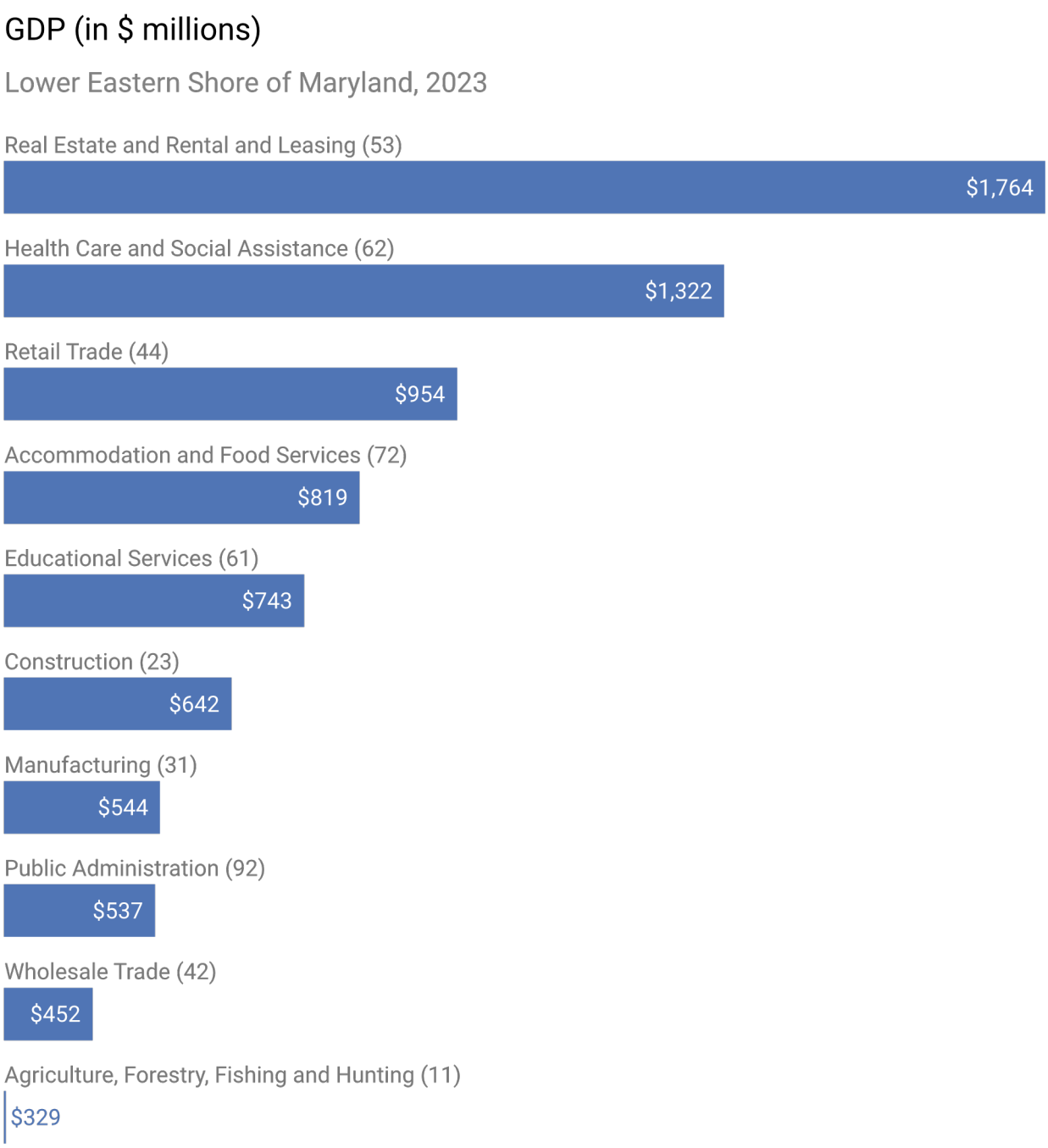
Gross Domestic Product

Gross Domestic Product (GDP) is the total value of goods and services produced by a region. In 2023, nominal GDP in the Lower Eastern Shore of Maryland expanded 4.9%. This follows growth of 9.9% in 2022. As of 2023, total GDP in the Lower Eastern Shore of Maryland was $10,340,407,000.



Gross Domestic Product data are provided by the Bureau of Economic Analysis, imputed by Chmura where necessary, updated through 2023.

Of the sectors in the Lower Eastern Shore of Maryland, Real Estate and Rental and Leasing contributed the largest portion of GDP in 2023, $1,763,501,000 The next-largest contributions came from Health Care and Social Assistance ($1,322,001,000); Retail Trade ($953,882,000); and Accommodation and Food Services ($818,945,000).



Gross Domestic Product data are provided by the Bureau of Economic Analysis, imputed by Chmura where necessary, updated through 2023.

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.

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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.

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.

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.

Contact Information

Chief Local Elected Official(s):	
Jeff Merritt	Chair, Tri-County Council for the Lower Eastern Shore of Maryland Wicomico County Council 125 N. Division St. Salisbury, MD 21804 410-548-4696 jmerritt@wicomicocounty.org
Workforce Development Board Chair:	
Tony Nichols	Workforce Development Board Chair c/o Lower Shore Workforce Alliance 31901 Tri-County Way, Suite 215 Salisbury MD 21801 410-341-3835 tony.nichols@bbsi.com
Executive Director:	
Greg Padgham	Executive Director, Tri-County Council for the Lower Eastern Shore of Maryland 31901 Tri-County Way, Suite 203 Salisbury MD 21804 410-341-8989 gpadgham@tcclesmd.org
Workforce Director:	
Leslie Porter-Cabell	Workforce Director, Lower Shore Workforce Alliance 31901 Tri-County Way, Suite 215 Salisbury MD 21804 410-341-3835 lporter-cabell@lswa.org

Signatures

		Assurance
☑	1.	Consistent with WIOA Section 108(d), for the 2020-2024 Plan, the Local Board has held at least one public comment period of no less than 30 days to obtain input into the development of the Local Plan and to provide the opportunity for comment by representative of business, labor organizations, education, other key stakeholders, and the general public.
☑	2.	The final Local Plan is available and accessible to the general public.
☑	3.	The Local Board has established procedures to ensure public access (including people with disabilities) to board meetings and information regarding board activities, such as board membership and minutes.
☑	4.	The Local Board makes publicly-available any local requirements for the Local Area, such as policies, including policies for the use of WIOA Title I funds.
☑	5.	The Local Board has established a written policy or procedure that identifies circumstances that might present conflict of interest for any local workforce investment board or entity that they represent, and provides for the resolution of conflicts.
☑	6.	The Local Board has copies of memoranda of understanding between the Local Board and each American Job Center partner concerning the operation of the American Job Center delivery system in the Local Area, and has provided the State with the latest versions of its memoranda of understanding.
☑	7.	The Local Board has written policy or procedures that ensure American Job Center operator agreements are reviewed and updated no less than once every three years.
☑	8.	The Local Board has procurement policies and procedures for selecting One-Stop operators, awarding contracts under WIOA Title I Adult and Dislocated Worker funding provisions, and awarding contracts for Youth service provision under WIOA Title I in accordance with applicable state and local laws, rules, and regulations, provided no conflict exists with WIOA.
☑	9.	The Local Board has procedures for identifying and determining the eligibility of training providers and their programs to receive WIOA Title I individual training accounts.
☑	10.	The Local Board has written procedures for resolving grievances and complaints alleging violations of WIOA Title I regulations, grants, or other agreements under WIOA and written policies or procedures for assisting customers who express interest in filing complaints at any point of service, including, at a minimum, a requirement that all partners can identify appropriate staff contacts and refer customers to those contacts.
☑	11.	The Local Board has established at least one comprehensive, full-service American Job Center and has a written process for the local Chief Elected Official and Local Board to determine that the center conforms to the definition therein.

☑	12.	All partners in the local workforce and education system described in this plan ensure the physical, programmatic and communications accessibility of facilities, programs, services, technology and materials in the Local Area's American Job Centers for individuals with disabilities.
☑	13.	The Local Board ensures that outreach is provided to populations and sub-populations who can benefit from American Job Center services.
☑	14.	The Local Board implements universal access to programs and activities to individuals through reasonable recruitment targeting, outreach efforts, assessments, service delivery, partner development, and numeric goals.
☑	15.	The Local Board complies with the nondiscrimination provisions of Section 188, and assures that Methods of Administration were developed and implemented.
☑	16.	The Local Board collects and maintains data necessary to show compliance with nondiscrimination provisions of Section 188 of WIOA.
☑	17.	The Local Board complies with restrictions governing the use of federal funds for political activities, the use of the American Job Center environment for political activities, and the Local Board complies with the applicable certification and disclosure requirements.
☑	18.	The Local Board ensures that American Job Center staff, along with the Migrant and Seasonal Farmworker program partner agency, will continue to provide services to agricultural employers and Migrant and Seasonal Farmworkers that are demand-driven and consistent with MD Labor policy.
☑	19.	The Local Board follows confidentiality requirements for wage and education records including, but not limited to, 20 C. F. R. 603, the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended, WIOA, and applicable State laws, Departmental regulations and policies.
☑	20.	The Local Board has a written policy and procedures to competitively award grants and contracts for WIOA Title I activities (or applicable federal waiver), including a process to be used to procure training services made as exceptions to the Individual Training Account process.
☑	21.	The Local Board has accounting systems that follow current Generally Accepted Accounting Principles (GAAP) and written fiscal-controls and fund-accounting procedures and ensures such procedures are followed to insure proper disbursement and accounting of WIOA adult, dislocated worker, and youth program and the Wagner-Peyser Act funds.
☑	22.	The Local Board ensures compliance with the uniform administrative requirements under WIOA through annual, on-site monitoring of each local sub-recipient.
☑	23.	The Local Board has a written debt collection policy and procedures that conforms with state and federal requirements and a process for maintaining a permanent record of all debt collection cases that supports the decisions made and documents the actions taken with respect to debt collection, restoration, or other debt resolution activities.

☑	24.	The Local Board has a written policy and procedures for ensuring management and inventory of all properties obtained using WIOA funds, including property purchased with JTPA or WIA funds and transferred to WIOA, and that comply with WIOA, and, in the cases of local government, Local Government Property Acquisition policies.
☑	25.	The Local Board will not use funds received under WIOA to assist, promote, or deter union organizing.
☑	26.	The Local Board has a written policy and procedures that ensure adequate and correct determinations of eligibility for WIOA-funded basic career services and qualifications for enrollment of adults, dislocated workers, and youth in WIOA-funded individualized career services and training services, consistent with state policy on eligibility and priority of service.
☑	27.	The Local Board has a written policy and procedures for awarding Individual Training Accounts to eligible adults, dislocated workers, and youth receiving WIOA Title I training services, including dollar and/or duration limit(s), limits on the number of times an individual may modify an ITA, and how ITAs will be obligated and authorized.
☑	28.	The Local Board has a written policy and procedures that establish internal controls, documentation requirements, and leveraging and coordination of other community resources when providing supportive services and, as applicable, needs-related payments to eligible adult, dislocated workers, and youth enrolled in WIOA Title I programs.
☑	29.	The Local Board has a written policy for priority of service at its American Job Centers and, as applicable, affiliate sites and for local workforce providers that ensures veterans and eligible spouses are identified at the point of entry, made aware of their entitlement to priority of service, and provided information on the array of employment, training and placement services and eligibility requirements for those programs or services.
☑	30.	The Local Board has developed plans and strategies for maximizing coordination of services provided by the State employment service under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) and services provided in the Local Area through the American Job Center delivery system, to improve service delivery and avoid duplication of services.
☑	31.	The Local Board will provide reasonable accommodation to qualified individuals with disabilities unless providing the accommodation would cause undue hardship.

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

Chief Local Elected Official Signature	Jeff Merritt, Chair Tri-County Council for the Lower Eastern Shore of MD	4/16/2025 Date
Executive Director Signature	Gregory Padgham, Executive Director Tri-County Council for the Lower Eastern Shore of MD	4/16/2025 Date
Tony Nichols (Mar 28, 2025 08:28 EDT) Local Board Chair Signature	Tony Nichols, Chair Lower Shore Workforce Development Board	03/28/2025 Date
Leslie Porter-Cabell (Mar 31, 2025 11:00 EDT) Local Board Director Signature	Leslie Porter-Cabell, Workforce Director Lower Shore Workforce Alliance	03/31/2025 Date

Approved by the Lower Shore Workforce Development Board, March 5, 2025

Approved by the Tri-County Council for the Lower Eastern Shore of Maryland, April 16, 2025