# Workforce Development Board Investing in People

# Frederick County Workforce Area Workforce Innovation and Opportunity Act (WIOA) Plan DRAFT REVISION 2021-2024

Public Comment Period: April 21, 2023- May 5, 2023



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## **Background & Executive Summary**

The Workforce Innovation and Opportunity Act (WIOA), Public Law 128-113, was signed by President Obama on July 22, 2014 after passing Congress with broad bipartisan support. The Opportunity Act reauthorizes and amends the Workforce Investment Act (1998) through important workforce system reforms. The Opportunity Act empowers local areas and private sector-led workforce Boards with the responsibility of developing a strategic, integrated plan that supports economic growth and labor force needs intended to grow the capacity and performance of the workforce system. Local Workforce Development Boards are required to develop a four year plan that describes the strategies, programs, and activities they will carry out to implement WIOA.

The Workforce Development Board (WDB) is a volunteer Board whose members are nominated by the Board's Executive Committee, approved by the Frederick County Executive, and appointed by the County Council. The

WDB works throughout the community, bringing employers, job seekers, youth, educators, labor groups, training providers and other organizations together to find and fund solutions to workforce challenges.

The vision of the Workforce Development Board is:

"A Frederick County where every person has the opportunity to maximize his or her career potential and all local employers have the human resources they need to grow and prosper. The Board envisions the workforce system in Frederick County as the "go to" for businesses that need skilled employees."

Workforce development partnerships are the foundation of success for matching workforce skills with employer needs while supporting self-sufficiency for job seeking customers. The Board prioritizes partnerships to ensure talent matches industry needs today and in the future. WIOA gives local boards the ability to be flexible, innovative, and demand driven. Successful workforce development solutions have a profound impact on the Frederick County community by:

- ✓ Providing business and industry with the skilled workers needed;
- ✓ Increasing family self-sufficiency through skill development and career pathways;
- ✓ Preparing youth and adults for lifelong learning and economic success;
- ✓ Aligning workforce system, employers, educators, and other partners for efficient and effective use of resources and
- ✓ Ensuring the local workforce system is inclusive, diverse and offers equal opportunity and accessibility for all;
- ✓ Leveraging local, state, and federal resources for economic and workforce development for our local area.

Guided by the Workforce Innovation and Opportunity Act and following demand-driven models for success, the WDB will work to ensure that the above objectives guide its work over the next four years. This 2020-2024 Frederick County Local WIOA Plan has been developed to reflect goals and objectives of the local Board, in collaboration with the County Executive, and WIOA partners. The local plan also supports the goals reflected in the Maryland State WIOA Plan.

## Statement on Diversity, Equity and Inclusion

Statement on Diversity, Equity and Inclusion Frederick County's Workforce Development System is committed to advancing diversity, equity and inclusion practices in its programming, communication, and service delivery. This commitment is ongoing and the system partners recognize it is an active process that requires continuous improvement, analysis and review. Frederick's workforce development partners embrace and encourage our customers' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socioeconomic status, veteran status, and other characteristics that make our community unique. The local system follows Maryland Labor's Nondiscrimination Plan on the basis of: race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency (LEP)), age, disability, or political affiliation or belief, or for the beneficiaries,

applicants, and participants only, on the basis of citizenship status, or participation in a program or activity that receives financial assistance under Title I of WIOA.

## **Public Comment Period**

The public was invited to submit comments to this revised plan between: April 21, 2023 – May 5,2023 via fcws@frederickworks.com

The local plan, revisions, and comments will be posted: <a href="https://www.frederickworks.com/wdb">https://www.frederickworks.com/wdb</a>

## Section 1 – Economic Analysis

This section should include an analysis of economic elements consisting of –

(A) An analysis of the regional economic conditions including existing and emerging in-demand industry sectors and occupations<sup>1</sup> and the employment needs of businesses in those industry sectors and occupations.<sup>2</sup> The analysis should identify local priority industries based on employer (and WIOA partner) input as well as how the Local Board plans to maximize opportunities for sustainable employment through those local industry priorities and needs.

Local economic conditions have been greatly dictated and impacted by the COVID-19 crisis. Restaurants/food service, hospitality, and retail have been the hardest hit with layoffs and furloughs. While the employment needs have acutely changed in these key industries, great efforts to support the employer-base in the local area have been implemented to support businesses, especially small businesses. The County has implemented several business relief programs. The county's Office of Economic Development continues to help businesses access local, state, and federal grants, loans, and workforce development programs.<sup>3</sup> Impacts of this aid will be examined in the upcoming months and even years.

Frederick County, part of the Maryland Capital Region with proximity to Washington D.C., has experienced strong long-term economic growth and is successful in attracting and retaining millennial workers. Home to the National Cancer Institute, Leidos Biomedical's Frederick National Laboratory for Cancer Research, and the U.S. Army Medical Research and Materiel Command at Fort Detrick, Frederick also has the highest concentration of private sector life sciences employment in the state. With its strategic location, comprehensive transportation network, educated workforce and moderate business costs, Frederick has attracted a diverse industry mix.

The county has successfully blended its rich agriculture heritage with a world-class advanced technology sector and is a leader in craft beverage sector growth. Computing and IT, manufacturing, and tourism are also thriving. The City of Frederick is intersected by five interstate and national highways that provide easy access within the Mid-Atlantic Region. Major private sector employers include Astra Zeneca, Lonza, Thermo Fisher, United Healthcare, Fannie Mae and Wells Fargo Home Mortgage regional headquarters. The county's private sector industries generate \$11.0 billion in economic activity. Significant recent projects include: the locations of Kite Pharma, Wilcoxon Sensing Technologies, a new U.S. headquarters for German-based Indivumed, HealthWell Foundation, Ocado/Kroeger fulfillment center and Dunkin Donuts Centralized Kitchen.<sup>4</sup>

<sup>&</sup>lt;sup>1</sup> Existing and emerging industries and occupations can be determined in a variety of ways (e.g., projections, location quotients). For your convenience, the LMI Team has provided the Growth Industry Tool (GIT) and the Growth Occupation Tool (GOT) available at: <a href="https://www.labor.maryland.gov/lmi/wiagrowthind/got.shtml">https://www.labor.maryland.gov/lmi/wiagrowthind/got.shtml</a>.

<sup>&</sup>lt;sup>2</sup> There are a variety of methods to determine employment needs (e.g., employer surveys, real-time Labor Market Information (LMI)). Real-time LMI (e.g., Advertised Job Skills, Job Opening Counts, and Certifications Advertised) is available at: <a href="https://mwejobs.maryland.gov/vosnet/Default.aspx">https://mwejobs.maryland.gov/vosnet/Default.aspx</a>.

<sup>&</sup>lt;sup>3</sup> http://www.discoverfrederickmd.com/covid-19 financial assistance

<sup>&</sup>lt;sup>4</sup> Frederick County Office of Economic Development

## Frederick County, Maryland Economic Overview 2020<sup>5</sup>



262,453

Population (2020)

Population grew by 17,456 over the last 5 years and is projected to grow by 13,782 over the next 5 years.

117,646

**Total Regional Employment** 

Jobs grew by 7,355 over the last 5 years and are projected to grow by 9,808 over the next 5 years.

\$92.0K

Median Household Income (2018)

Median household income is \$31.7K above the national median household income of \$60.3K.

As of 2020 the region's population increased by 7.1% since 2015, growing by 17,456. Population is expected to increase by 5.3% between 2020 and 2025, adding 13,782. From 2015 to 2020, jobs increased by 6.7% in Frederick County, MD from 110,291 to 117,646. This change outpaced the national growth rate of 6.2% by 0.5%. As the number of jobs increased, the labor force participation rate decreased from 65.1% to 60.1% between 2015 and 2020. Concerning educational attainment, 22.1% of Frederick County, MD residents possess

<sup>&</sup>lt;sup>5</sup> EMSI Economic Outlook Report

a Bachelor's Degree (3.0 percentage points above the national average), and 8.2% hold an Associate's Degree (the same as the national average).

## High Demand Industries<sup>6</sup>

Based on labor market data and analysis, economic development and partner input, the Board has identified the following high growth, high demand industries that have career pathways leading to family sustaining wages and credentials.



215+ +8%
Employers | 5-Year
Job Growt



\$90,972 Average Annual Salary 2,438
People
Employed

# Professional & Technical

800+ Employers +10% 5-Year Job Growth



\$96,816 Average Annual Salary 6,548
People
Employed

# Transportation, Warehousing, & Logistics

150+ Employers +5.4% 5-Year Job Growth



\$54,926 Average Annual Salary 1,440 People Employed

<sup>&</sup>lt;sup>6</sup> EMSI, O\*NET, Frederick County Office of Economic Development, Maryland Workforce Exchange

## Construction & Skilled Trades

900+ Employers +8.3% 5-Year Job Growth



\$72,632 Average Annual Salary 10,166 People Employed

# Admin & Business Support Services

400+ Employers +8% 5-Year Job Growth



\$40,040 Average Annual Salary

4,900 People Employed

# Healthcare & Social Assistance

1,100+ Employers +14% 5-Year Job Growth



\$56,733 Average Annual Salary 12,543 People Employed

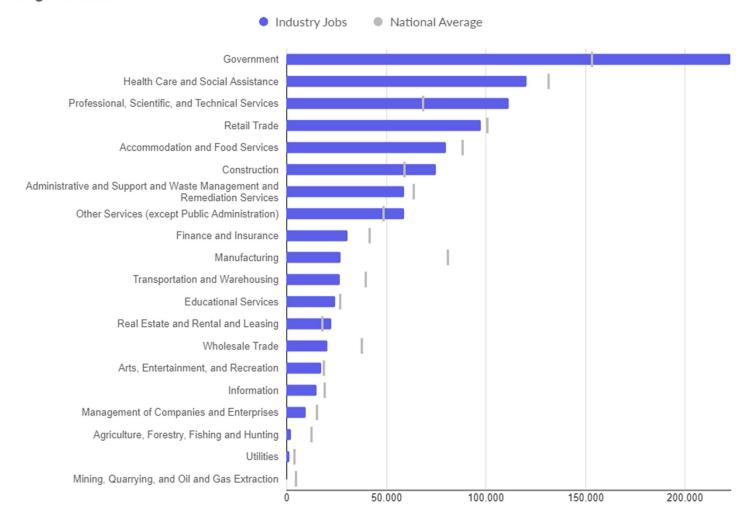


275+ Employers +4.7% 5-Year Job Growth

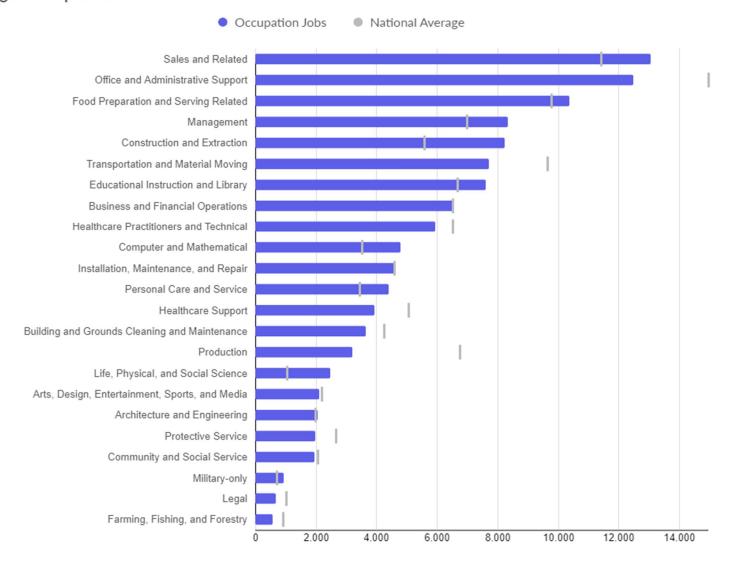


\$61,100 Average Annual Salary 5,230 People Employed

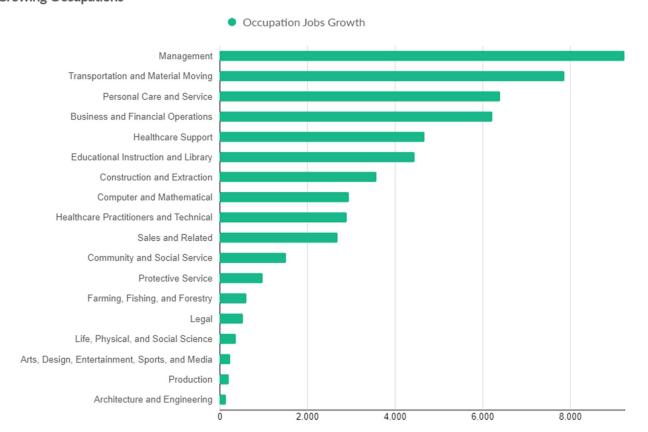
## Largest Industries



## **Largest Occupations**



#### **Top Growing Occupations**



Through the WIOA Title I administrative entity, Workforce Services/Frederick County Government, the local Board supports businesses and individuals in the high demand industries as indicated above. WIOA staff and partners review the labor market landscape regularly to educate and inform job seekers of career pathways, credentials, wages and employment and training strategies to achieve career goals. Workforce Services and the WIOA partners commit to working together to ensure individuals get access to supportive services and other assistance that will allow individuals to effectively participate in skill development, education, employment, and training programs.

## Section 2 – Strategic Planning to Maximize the Earning Capacity of Marylanders

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

- 1. Increase the earning capacity of Maryland's workforce system customers by maximizing access to employment;
- 2. Increase the earning capacity of Maryland's workforce system customers by maximizing access to and use of skills and credentialing;
- 3. Increase the earning capacity of Maryland's workforce system customers by maximizing access to and use of life management skills; and
- 4. Increase the earning capacity of Maryland's workforce system customers by eliminating barriers to employment.

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

- (A) An analysis of the knowledge and skills needed to meet the needs of the businesses in the Local Area, including employment needs in in-demand industry sectors and occupations.<sup>7</sup>
- (B) An analysis of the workforce in the Local Area, including current labor force employment (and unemployment) data,<sup>8</sup> and information on labor market trends, and the educational and skill levels of the workforce in the Local Area,<sup>9</sup> including individuals with barriers to employment.

<sup>&</sup>lt;sup>7</sup> There are a variety of ways to determine the knowledge and skills needed to meet the employment needs (e.g., employer surveys, real-time LMI). Real-time LMI (e.g., Certifications Advertised, Advertised Education Level) is available at: https://mwejobs.maryland.gov/vosnet/Default.aspx.

<sup>&</sup>lt;sup>8</sup> Employment and unemployment data is available at: <a href="https://www.labor.maryland.gov/lmi/laus/lauscounties.shtml">https://www.labor.maryland.gov/lmi/laus/lauscounties.shtml</a> and <a href="https://www.labor.maryland.gov/lmi/laus/lauscounties.shtml">https://www.labor.maryland.gov/lmi/laus/lauscounties.shtml</a> and <a href="https://www.labor.maryland.gov/lmi/laus/lauscounties.shtml">https://www.labor.maryland.gov/lmi/laus/lauscounties.shtml</a> and <a href="https://www.labor.maryland.gov/lmi/lauscounties.shtml">https://www.labor.maryland.gov/lmi/lauscounties.shtml</a> and <a href="https://www.labor.maryland.gov/lmi/lauscounties.shtml">https://

There are a variety of ways to determine educational and skill levels of the workforce. Real-time LMI is available at: <a href="https://mwejobs.maryland.gov/vosnet/Default.aspx">https://mwejobs.maryland.gov/vosnet/Default.aspx</a>. Worker educational attainment by area is available at: <a href="http://onthemap.ces.census.gov/">http://onthemap.ces.census.gov/</a>.

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.

Considering Frederick County's diverse industry base and demonstrated occupation needs, the knowledge, skills and abilities required for economic sustainability and growth vary. Frederick County is home to one of the most highly educated and talented workforces in the nation. 39% of the Frederick County's population age 25 years and older has a bachelor's degree or higher – that's the 3<sup>rd</sup> highest among counties in Maryland. Maryland claims the top spot in the country for the percentage of technical and professional workers in the workplace (28%) and professional and business employment dominates Frederick County's workforce. There is a dedicated labor pool of nearly 130,000. Given the past economic successes and predictions of industry demands, labor market data and feedback from industry leaders, particularly in life sciences and technology, the knowledge and skills needed to meet current and projected needs include:

- Math concepts
- Knowledge in the sciences
- Effective written and verbal communication skills
- Adaptability
- Leadership and Management Skills
- Computer Skills
- Critical Thinking and Problem Solving
- Ability to read, interpret and analyze information

## 2020 Labor Force Breakdown



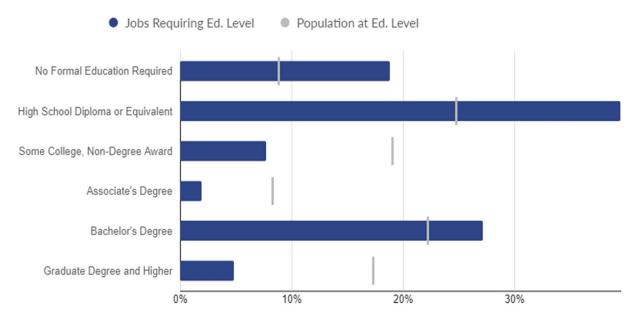
## **Unemployment Rate Trends**

Frederick County, MD had an October 2020 unemployment rate of 6.29%, increasing from 4.46% 5 years before.



The local area saw an acute rise in the unemployment rate beginning in January, 2020 mainly as a result of the impact of COVID-19 and the declared state of emergency.

## Underemployment



## Underemployed

The ALICE (Asset Limited, Income Constrained, Employed) Report<sup>10</sup> for Frederick County presents the latest ALICE data available — a point-in-time snapshot of economic conditions across the county in 2018. By showing how many Frederick County households were struggling then, the ALICE Research provides the backstory for why the COVID-19 crisis is having such a devastating economic impact. This data can be used to estimate the impact of the crisis over time, providing an important baseline for changes to come. Considering this population is likely to need workforce development, employment and training and supportive services to achieve family sustaining incomes, it is an important demographic to understand.

According to the most recent ALICE report, in Frederick County, 35,291 households—37%—could not afford basic needs such as housing, child care, food, transportation, health care, and technology in 2018. Despite overall improvement in employment rates, and gains in median income, the economic recovery in Frederick County, like that in the rest of the state of Maryland, has not reached all households. Many families continue to face challenges from low wages, reduced work hours, depleted savings, and increasing costs. ALICE households have incomes above the Federal Poverty Level (FPL), but struggle to afford basic household necessities.

## Cost of Living

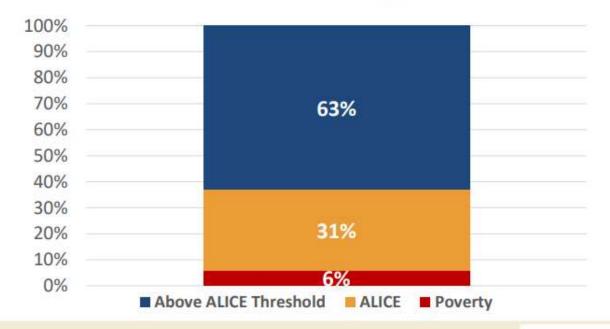
The cost of household necessities varies across Maryland, and is higher in Frederick County than the state average. Costs have increased significantly faster in Frederick County than the overall rate of inflation since the end of the Great Recession in 2010. As described in the 2020 ALICE report, the Household Survival Budget reflects the bare minimum cost to live and work in the modern economy and includes housing, child care, food, transportation, health care, technology (a smart phone), and taxes.

In Frederick County, the average Household Survival Budget was \$109,176 for a family of four (two adults with one infant and one preschooler) in 2018, significantly greater than the state average of \$87,156. For a single adult, the average Household Survival Budget was \$47,268, above the state average of \$33,636 (Figure 2). This bare-minimum budget is still significantly higher than the Federal Poverty Level, which was \$25,100 for a family and \$12,140 for a single adult in 2018. Another way to look at the Household Survival Budget is by the hourly wage necessary to support it. To afford the family budget in Frederick County, one parent working 40 hours per week for 50 weeks per year would need to earn \$54.59 per hour, or two parents would need to earn \$27. This data will be used in determining WIOA eligibility criteria to ensure maximum access to employment, training, career planning, and supportive services.

<sup>&</sup>lt;sup>10</sup> ALICE Report for Frederick County – United Way of Frederick



## Frederick County, MD



Maryland State Association of United Ways

UnitedWayALICE.org/Maryland

Slides and other information available at www.uwfrederick.org/ALICE

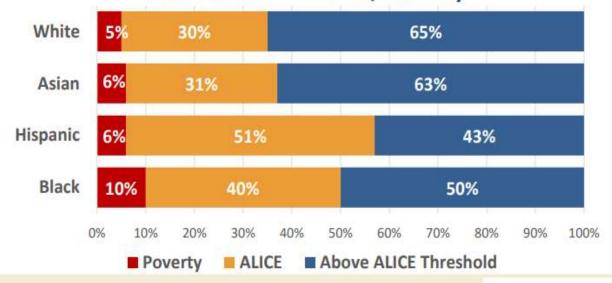






## Frederick County, MD

**DEMOGRAPHICS: Race/Ethnicity** 



Maryland State Association of United Ways

UnitedWayALICE.org/Maryland

Slides and other information available at www.uwfrederick.org/ALICE





## Demographics and Population Characteristics<sup>11</sup>

In 2014-2018, an estimated 89.4 percent of the people living in Frederick County, Maryland were U.S. natives. 50.0 percent of the Frederick County, Maryland population were living in the state where they were born. Approximately 10.6 percent of Frederick County, Maryland residents in 2014-2018 were foreignborn. 51.5 percent of foreign born were naturalized U.S. citizens and an estimated 80.5 percent entered the country before the year 2010. Foreign-born residents of Frederick County, Maryland come from different parts of the world. The bar graph below displays the percentage of foreign born from each world region of birth in 2014-2018 for Frederick County, Maryland.

## Region of Birth for the Foreign-Born Population in Frederick County, Maryland in 2014-2018



View Data in Table Format 1

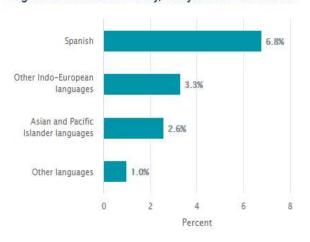
<sup>&</sup>lt;sup>11</sup> American Community Survey



## Language

Among people at least five years old living in Frederick County, Maryland in 2014-2018, 13.7 percent spoke a language other than English at home. Spanish was spoken by 6.8 percent of people at least five years old; 4.9 percent reported that they did not speak English "very well."

## Percent of the Population 5 years and over who Speak a Language other than English in Frederick County, Maryland in 2014-2018



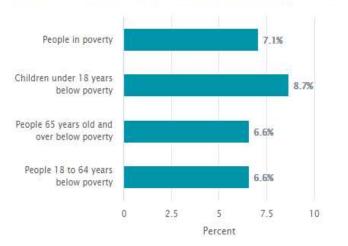
View Data in Table Format 1



## Poverty and Participation in Government Programs

In 2014-2018, 7.1 percent of people were in poverty. An estimated 8.7 percent of children under 18 were below the poverty level, compared with 6.6 percent of people 65 years old and over. An estimated 6.6 percent of people 18 to 64 years were below the poverty level.

## Poverty Rates in Frederick County, Maryland in 2014-2018



View Data in Table Format 1

In 2014-2018, 6.8 percent of households received SNAP (the Supplemental Nutrition Assistance Program). An estimated 54.1 percent of households that received SNAP had children under 18, and 31.4 percent of households that received SNAP had one or more people 60 years and over. An estimated 31.0 percent of all households receiving SNAP were families with a female householder and no husband or domestic partner present. An estimated 41.5 percent of households receiving SNAP had two or more workers in the past 12 months.

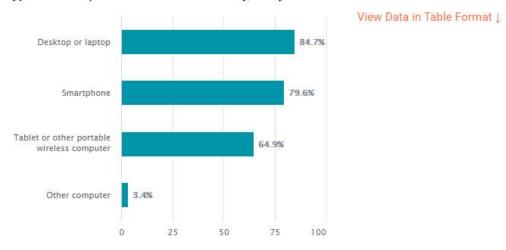
## Computer and Internet Use



In 2014-2018, 91.8 percent of households in Frederick County, Maryland had a computer, and 87.0 percent had a broadband internet subscription.

An estimated 84.7 percent of households had a desktop or laptop, 79.6 percent had a smartphone, 64.9 percent had a tablet or other portable wireless computer, and 3.4 percent had some other computer.

## Types of Computers in Frederick County, Maryland in 2014-2018



In 2014-2018, 91.8 percent of households in Frederick County, Maryland had a computer, and 87.0 percent had a broadband internet subscription. An estimated 84.7 percent of households had a desktop or laptop, 79.6 percent had a smartphone, 64.9 percent had a tablet or other portable wireless computer, and 3.4 percent had some other computer. The digital divide and technology disparities have become exacerbated during the pandemic. Frederick's workforce system has pulled together to try to address this accessibility issue. The local TCA/TANF partner has been able to support clients with laptops in order to conduct job search activities and/or support virtual education and training. Title I is exploring ways to use supportive services and other funding streams to support job seekers in virtual employment and training activities.

Subject	Frederick County, Maryland <sup>12</sup>					
,	Total	Labor Force Participation Rate	Employment/P opulation Ratio	Unemployment rate		
	Estimate	Estimate	Estimate	Estimate		
Population 16	194,819	70.9%	66.9%	5.1%		
years and over						
AGE						
16 to 19 years	13,581	43.2%	36.2%	15.5%		
20 to 24 years	15,017	81.4%	70.6%	11.7%		
25 to 29 years	14,632	89.5%	83.0%	6.7%		
30 to 34 years	15,666	87.8%	84.3%	3.4%		
35 to 44 years	32,028	88.5%	85.0%	3.3%		
45 to 54 years	39,005	87.5%	83.6%	4.2%		
55 to 59 years	18,009	81.4%	78.6%	3.5%		
60 to 64 years	14,011	65.7%	63.5%	3.5%		
65 to 74 years	19,379	29.7%	29.0%	2.6%		
75 years and over	13,491	7.5%	7.5%	0.5%		
RACE AND						
HISPANIC OR						
LATINO ORIGIN						
White alone	161,772	70.2%	66.6%	4.7%		
Black or African	16,895	73.2%	67.2%	7.4%		
American alone						
American Indian and Alaska Native alone	541	76.3%	72.3%	3.5%		
Asian alone	8,573	71.2%	67.0%	5.6%		
Native Hawaiian and Other Pacific Islander alone	123	68.3%	68.3%	0.0%		
Some other race alone	2,757	87.1%	81.4%	6.5%		
Two or more races	4,158	74.1%	67.9%	6.6%		
Hispanic or Latino origin (of any race)	14,726	78.7%	74.5%	4.6%		
White alone, not Hispanic or Latino	151,003	69.7%	66.1%	4.7%		

<sup>&</sup>lt;sup>12</sup> Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates

POVERTY STATUS IN THE PAST 12				
MONTHS				
Below poverty level	9,356	57.6%		
At or above the poverty level	137,105	87.0%	44.2%	23.2%
DISABILITY STATUS				
With any disability	12,773	57.0%	51.0%	10.1%

Subject	Frederick County, Maryland			
	Total	Percent	Veterans	Percent Veterans
	Estimate	Estimate	Estimate	Estimate
Civilian population 18 years and over	187,074	(X)	16,931	9.1%
PERIOD OF SERVICE				
Gulf War (9/2001 or later) veterans	(X)	(X)	3,564	22.2%
Gulf War (8/1990 to 8/2001) veterans	(X)	(X)	4,119	25.6%
Vietnam era veterans	(X)	(X)	4,964	30.9%
Korean War veterans	(X)	(X)	1,114	6.9%
World War II veterans	(X)	(X)	549	3.4%
SEX			Veterans	
Male	90,825	48.6%	14,134	87.9%
Female	96,249	51.4%	1,943	12.1%
AGE			Veterans	
18 to 34 years	51,445	27.5%	1,298	8.1%
35 to 54 years	70,739	37.8%	5,435	33.8%
55 to 64 years	32,020	17.1%	2,640	16.4%
65 to 74 years	19,379	10.4%	3,789	23.6%
75 years and over	13,491	7.2%	2,915	18.1%
RACE AND HISPANIC OR LATINO ORIGIN			Veterans	
White alone	155,914	83.3%	13,449	83.7%
Black or African American alone	16,053	8.6%	1,794	11.2%
American Indian and Alaska Native alone	499	0.3%	86	0.5%
Asian alone	8,262	4.4%	166	1.0%
Veterans				

Native Hawaiian and Other Pacific	123	0.1%	17	0.1%
Islander alone				
Some other race alone	2,632	1.4%	285	1.8%
Two or more races	3,591	1.9%	280	1.7%
Hispanic or Latino (of any race)	13,928	7.4%	980	6.1%
White alone, not Hispanic or Latino	145,707	77.9%	12,830	79.8%
EDUCATIONAL ATTAINMENT			Veterans	
Civilian population 25 years and over	165,771	(X)	15,868	(X)
Less than high school graduate	12,336	7.4%	575	3.6%
High school graduate (includes	40,810	24.6%	3,652	23.0%
equivalency)				
Some college or associate's degree	45,643	27.5%	5,301	33.4%
Bachelor's degree or higher	66,982	40.4%	6,340	40.0%
EMPLOYMENT STATUS		Veterans		
Civilian population 18 to 64 years	154,204	(X)	9,373	(X)
Labor force participation rate	(X)	83.4%	(X)	88.6%
Civilian labor force 18 to 64 years	128,607	(X)	8,303	(X)
Unemployment rate	(X)	5.0%	(X)	2.6%
POVERTY STATUS IN THE PAST 12		Veterans		
MONTHS				
Civilian population 18 years and over	183,229	(X)	15,960	(X)
for whom poverty status is determined		` '		
Income in the past 12 months below	12,081	6.6%	656	4.1%
poverty level				
Income in the past 12 months at or	171,148	93.4%	15,304	95.9%
above poverty level				
DISABILITY STATUS		Veterans		
Civilian population 18 years and over	183,229	(X)	15,960	(X)
for whom poverty status is determined				
With any disability	23,365	12.8%	3,262	20.4%
Without a disability	159,864	87.2%	12,698	79.6%
· · · · · · · · · · · · · · · · · · ·			1	<u> </u>

## Highlighting Veterans

The County has a Veterans Advisory Council to address the various needs of the Frederick veteran community. With nearly 17,000 veterans in the county, it is critical to ensure they are afforded opportunities to connect to supports and services whether they be related to health/mental health care, employment and training, or other supports that are available. The advisory committee is led by veterans in the Frederick community, and there is

an ex-officio position for the director for Workforce Services on the council to ensure communication around special employment and training programs for veterans.

#### **Educational Attainment**

Concerning educational attainment, 22.1% of Frederick County, MD residents possess a Bachelor's Degree (3.0% above the national average), and 8.2% hold an Associate's Degree (the same as the national average).



The table below shows the occupations with the highest job openings advertised online in Frederick County, MD on November 30, 2020 (Jobs De-duplication Level 2). 13

Rank	Occupation	Mean (Average) Wage	Job Openings	Potential Candidates	Potential Candidates Per Job Opening
1	Registered Nurses	\$76,820	231	67	0.29
2	Retail Salespersons	\$27,736	118	198	1.68
3	First-Line Supervisors of Food Preparation and Serving Workers	\$38,505	109	27	0.25
4	Laborers and Freight, Stock, and Material Movers, Hand	\$32,634	95	172	1.81

<sup>&</sup>lt;sup>13</sup> Job Source: Online advertised jobs data - Candidate Source: Individuals with active résumés in the workforce system.

Wage Source: Occupational Employment Statistics (OES) Program

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5	Heavy and Tractor-Trailer Truck Drivers	\$47,943	89	153	1.72
6	Healthcare Practitioners and Technical Workers, All Other	\$89,581	86	10	0.12
7	Customer Service Representatives	\$37,722	71	624	8.79
8	Combined Food Preparation and Serving Workers, Including Fast Food	\$23,702	70	76	1.09
9	First-Line Supervisors of Retail Sales Workers	\$46,240	67	135	2.01
10	Personal Care Aides	\$26,914	62	27	0.44

The table below shows the distribution number of job openings advertised online, as well as potential candidates in the workforce system in Frederick County, MD by occupation group on November 30, 2020 (Jobs De-duplication Level 2).<sup>14</sup>

Rank	Occupation Group	Job Openings	Candidates
1	Healthcare Practitioners and Technical Occupations	652	421
2	Transportation and Material Moving Occupations	341	835
3	Sales and Related Occupations	338	1,065
4	Management Occupations	334	2,417
5	Food Preparation and Serving Related Occupations	297	683
6	Office and Administrative Support Occupations	244	2,795
7	Computer and Mathematical Occupations	194	1,255

 $<sup>^{14}\, \</sup>text{Job Source: Online advertised jobs data-Candidate Source: Individuals with active r\'esum\'es in the workforce system.}$ 

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8	Production Occupations	192	312
9	Architecture and Engineering Occupations	183	315
10	Business and Financial Operations Occupations	153	958
11	Life, Physical, and Social Science Occupations	140	297
12	Personal Care and Service Occupations	126	342
13	Healthcare Support Occupations	116	492
14	Installation, Maintenance, and Repair Occupations	89	443
15	Arts, Design, Entertainment, Sports, and Media	74	659
16	Education, Training, and Library Occupations	70	345
17	Building & Grounds Cleaning & Maintenance	65	243
18	Community and Social Services Occupations	61	317
19	Construction and Extraction Occupations	58	469
20	Protective Service Occupations	46	289

The table below shows the minimum level of education requested by employers on job openings advertised online, as well as the educational attainment of potential candidates in the workforce system that are looking for jobs in Frederick County, MD on November 30, 2020. There were 4286 job openings advertised online that did not specify a minimum education requirement (Jobs De-duplication Level 2). <sup>15</sup>

Rank	Education Level	Job Openings	Percentage of Job Openings	Potential Candidates	Percentage of Potential Candidates
1	No Minimum Education Requirement	307	5.66%	0	N/A
2	Less than High School	0	N/A	302	2.10%
3	High School Diploma or Equivalent	434	8.00%	3,675	25.54%
4	1 Year of College or a Technical or Vocational School	2	0.04%	0	N/A
5	Vocational School Certificate	11	0.20%	1,013	7.04%
6	Associate's Degree	69	1.27%	1,292	8.98%
7	Bachelor's Degree	244	4.50%	3,960	27.52%
8	Master's Degree	26	0.48%	1,774	12.33%
9	Doctorate Degree	49	0.90%	314	2.18%

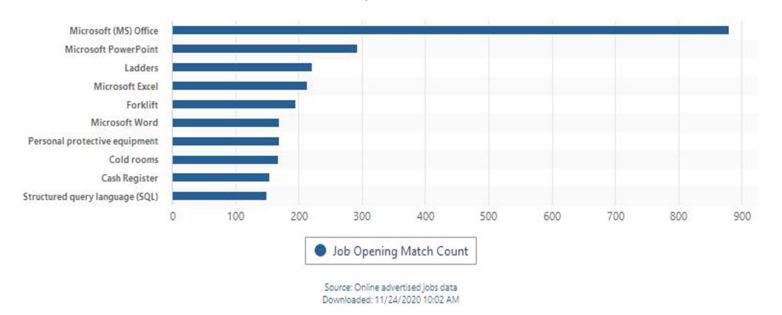
 $<sup>^{15}</sup>$  Source: Job Source: Online advertised jobs data- Candidate Source: Individuals with active résumés in the workforce system. Downloaded:  $12/01/2020\ 1:53\ PM$ 

## Advertised Jobs Per Industry

Rank	Industry	Job Openings
1	Health Care and Social Assistance	891
2	Retail Trade	547
3	Professional, Scientific, and Technical Services	426
4	Accommodation and Food Services	378
5	Manufacturing	282
6	Administrative and Support and Waste Management	268
	and Remediation Services	
7	Transportation and Warehousing	247
8	Educational Services	185
9	Wholesale Trade	94
10	Other Services (except Public Administration)	73

Advertised Tools and Technology

The graph below shows the top advertised detailed tools and technologies found in job openings advertised online in Frederick County, MD in October, 2020.



This presents opportunity for the local Board to engage businesses and create a system that improves the connectivity of available labor to training that leads to careers in those occupation areas.

The local Board and WIOA partners are committed to:

- working to design programs and solutions that meet the needs of job seekers and employers;
- engaging and convening industry and business leaders to continue to analyze workforce needs and provide career pathways approaches to workforce development; and

- leveraging supportive services, partner resources and expertise to provide appropriate and viable workforce solutions that work for both job seekers and businesses;
- Increasing education and awareness around career pathways and resources available to assist individuals pursue them;
- Increasing the use of stipends and incentive payments for youth and adults with limited work experience who need employment readiness skills
- (C) An analysis of the workforce development activities (including education and training) in the Local Area, including an analysis of the strengths and weaknesses of such services, and the capacity to provide such services, to address the identified education and skill needs of the workforce and the employment needs of employers in the Local Area.

Frederick County is home to 3 institutions of higher learning, including one community college. Programs offered through these providers prepare people for careers in business, science, healthcare and much more. Frederick Community College offers a large variety of career training programs leading certificates and credentials. As of this writing, there are <u>currently only 3 eligible local training providers</u> offering in demand programs included on the Maryland Eligible Training Providers list. The providers offer a variety of training programs that WIOA participants have completed. They include:

Accounting
Addictions Counseling
Bioprocessing Technology Certificate
Building Trades Technology-Electrical
Building Trades Technology-HVAC
Building Trades Technology-Welding
Business Management
Business Management Certificate
CERTIFIED NURSING ASSISTANT (CNA)
CompTIA A+ Exam Prep
CompTIA Network+ Exam Prep
CompTIA Security+ Exam Prep

Healthcare Practice Management
Hospitality Management Certificate
Information Technology
Medical Assistant
Medical Billing
Surgical Technology Certificate
Veterinary Assistant

Because WIOA requires customer choice in selecting training options, the Board and Workforce Services will continue to work with providers, even outside the local area, in order to maximize customer choice. Workforce Services aligns WIOA funded training with in-demand occupations with careers that lead to economic self-sufficiency. It will be a priority to support job seekers in need of technology or other assistive supports that can help them successfully participate in training activities.

Due in part to the healthy economic climate and relatively low unemployment rate in Frederick County, employers in many industries face challenges finding well-qualified and skilled employees. In response, the Board plans to support a diverse array of services and activities to better meet employers' needs and prepare a skilled and job-ready workforce.

#### Planned activities and solutions include:

- Internship, work based learning, transitional employment, and on-the-job training (OJT)
  programs designed to facilitate movement from experience-based opportunities to secure
  employment;
- o Incumbent worker programs and/or referrals to state-funded training programs such as Maryland Business Works
- o Career navigation and other supports for individuals who possess barriers to employment
- o Business communication and outreach strategies that result in the creation of direct pipelines between job seekers and employers
- Strategies to use contract training and models to build pipelines of workers who have skills and credentials required by our local businesses
- o Individual Training Accounts (ITA) for eligible and suitable individuals that maximize choices of programs and vendors
- Collaborative efforts with training, education, and economic development partners to share information on industry needs, develop strategies and training for specific career pathways and/or that lead to industry skills and credentials.
- o Collaborate with training providers to facilitate quicker access to employment opportunities.

## Strengths of Frederick County's Workforce System

- 1. Consistent and long standing history of programmatic compliance, fiscal integrity, and meeting or exceeding federal performance standards.
- 2. Strong linkages with economic development and WIOA partners.
- 3. In-depth knowledge of local and regional labor markets.
- 4. Key contributor to statewide workforce development through various program, operational, business services and fiscal workgroups.
- 5. Highly qualified and certified workforce development practitioners possessing the following credentials:
  - ✓ Certified Professional Resume Writer (CPRW)
  - ✓ Certified Federal Jobs Coach
  - ✓ Certified EMSI Labor Market Analyst (EMSI)
  - ✓ Global Career Development Facilitator (GCDF)
  - ✓ Society for Human Resource Management Certified Professional (SHRM-CP)
  - ✓ Certified Social Media Career Strategist (CSMC)
  - ✓ Certified Workforce Development Professional (CWDP)
- 6. Frederick County Government support and funding allows maximum flexibility in offering services to County residents and businesses, including:

- ✓ Free, professionally facilitated job search workshop program offering nearly 200 workshops per year at a variety of times and locations. Workshops focus on topics including using the computer for job search, social media for job search success, professional branding, resume writing, interviewing, job clubs, a Federal Jobs Workshop.
- ✓ Outreach and programs offered at libraries and capacity to build partnerships with other community-based groups.
- ✓ Robust offerings and support for business recruitment, hiring and workforce training.

## **Capacity and Challenges**

Serving individuals with barriers, in some cases significant barriers, will require more resources, financial and otherwise. It is likely those individuals will require longer service time. The Board and WIOA partners will work together to develop collaborative approaches to serving those with barriers in a way that maximizes employment opportunities that lead to self-sufficiency.

The Board and its WIOA partners will take a holistic view of individual development, recognizing that successful employment is just one element of self-sufficiency, particularly for those who face multiple challenges and barriers to employment. Moreover, the Board recognizes that those with significant barriers to employment may need additional and longer-term assistance than those who do not face such barriers. While not ideal, the increased intensity of services needed may result in fewer WIOA participants being served, but with longer program participation durations. The local Board and WIOA partners will put people before performance and practice customer-centered design in the delivery of services and programs.

At the time of this writing, services are provided both in-person and virtually offering flexible options for customers. As with all programs and services offered, partners in the local workforce system will work to ensure maximum accessibility and equity for workforce system participants.

WIOA partners plan to increase staff training opportunities and awareness of partner resources to better equip our staff with the tools needed to be effective assisting individuals. This may include cross-training with other WIOA partners, including Department of Social Services/Family Investment Programs and Division of Rehabilitation Services staff, and providers of adult education and literacy programs. In addition, training on WIOA Section 101, Diversity, Equity, and Inclusion are planned and will be coordinated by the One Stop Operator. Ongoing staff training and professional development is planned, and topics may vary.

Finally, given the COVID-19 public health pandemic, the economic impacts will be seen for months, perhaps years to come. Frederick County's strong and diverse economy could lead to re-training opportunities for workers in the retail, restaurant and hospitality industries. Many local workforce system customers have solid work backgrounds as well as those who have significant barriers to obtaining and maintaining successful employment.

Individuals falling in this latter category possess a number of skill challenges or barriers that require targeted and intensive services. Issues faced by this population include:

Very low skills and limited education

- Limited or no employment history
- Decreased confidence/ self-esteem
- Limited English language skills
- Lack of resources that prohibit employment, such as access to child care, reliable transportation and sustainable housing
- A criminal background
- History of substance abuse or mental health issues

The Board and WIOA partners intend to work with community organizations to develop strategies and supportive programs that target needs across these skill and learning deficits, as well as address other barriers tied to individuals' life circumstances.

## **Business Services Capacity**

WIOA partner staff are highly qualified and have demonstrated performance in the provision of multi-level assistance to employers. Staff possesses top notch education and credentials including MBA, MPA, PHR, CPRW, and GCDF certifications. Staff participate in regular trainings and learning opportunities to develop skills in the following areas:

- Support in the creation of job descriptions;
- Assessments of candidate skills;
- Pre-screening of candidates and active referrals;
- Access to onsite and virtual interview and recruitment space/platforms
- Support to businesses throughout business life cycle; Provide connections to business supports offered through other local, state entities
- Opportunity for employers to request training on specific skills (training specific to their business/culture)
- Broker connections to other business support services including, but not limited to Economic
  Development, Small Business Development Center/Counseling, Chamber of Commerce, Frederick
  County Society for Human Resource Management, Frederick Community College and other higher
  education institutions.
- Messaging the value proposition to businesses through employer education materials and events.

## Partnerships with Key Education Providers

The local Board enjoys strong relationships with key local education providers including:

- Frederick Community College
- Hood College
- Frederick County Public Schools
- Frederick County Career and Technology Education
- Mount St. Mary's University

These partnerships provide opportunities to explore ideas and strategies that bridge learning and skills gaps that exist between job seekers and key industry partners. Local Board members as well as many Workforce Services staff serve on various advisory committees and provide linkages to state and local education and workforce initiatives. The local Board will maintain and build upon its relationships with key education providers.

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

The vision of the Workforce Development Board is a Frederick County where **every** person could maximize their career potential and all local employers have the human resources they need to grow and prosper. This is directly in alignment with Maryland's Benchmark for Success goals which seek to maximize access to services to promote and sustain economic self-sufficiency. The local Board is committed to working within the workforce system to support and align strategies that prepare an educated and skilled workforce. The Board and its partners will collaborate to create the necessary conditions for moving all job seekers to high quality and sustained employment, including youth and adults with barriers.

Workforce Services will use Title I funded programming directed at delivering career pathway models for training and leveraging its incumbent worker program to elevate the skills and earning potential of currently employed individuals, therefore increasing their earnings and increasing the competitiveness of its local employers. Strong partnerships exist with DORS, and DSS/TANF staff all of which have staff housed at the AJC. The WIOA partners have worked diligently over the last 7 years to develop tools and resources that support participants' positive experiences in the local workforce system.

Whenever possible and when relevant, the local service providers and WIOA partners will make referrals to one another or other community organizations to assist individuals in maximizing access to supports including life and crisis management resources, transportation assistance, mental and behavioral healthcare assistance, social services, adult education and English as a Second Language education assistance, and others. AJC staff are well-versed in the supportive services that exist in the local area.

Maryland's Benchmark	Local Area Supportive Strategy
Increase earning capacity of Maryland's workforce	Through the services offered by all AJC and local
system customers by maximizing access to	workforce partners, customers have access to both
employment.	virtual and physical assistance with locating job
	opportunities, responding to job announcements
	(resume and application assistance), supportive
	services, job coaching, and training that leads to
	careers with family-sustaining wages.
Increase earning capacity of Maryland's workforce	Title I training funds will be used to support
system customers by maximizing access to and use of	individuals seeking careers in high demand industries
skills and credentialing.	with career mobility potential. Training will lead to
	increased skill sets and credential attainment. Title I

	and local county funds are used to support		
	incumbent workers who need more skills and		
	credentials to keep their job and/or get promoted in		
	their careers.		
Increase earning capacity of Maryland's workforce	Local area and AJC staff use assessment techniques		
system customers by maximizing access to and use of	to determine the "readiness" of customers for		
life management skills.	employment. Appropriate referrals are made to		
	mental health/behavioral health providers and other		
	community supports that can help address		
	immediate crises, and get customers access to the		
	life management assistance needed to successfully		
	pursue employment.		
Increase earning capacity of Maryland's workforce	Local area and AJC staff use assessment techniques		
system customers by eliminating barriers to	to determine the any barriers to employment.		
employment.	Appropriate referrals are made and customers are		
	given access to information on assistance with		
	housing, mental/behavioral health, transportation,		
	social services, including child care vouchers, access		
	to expungement workshops and re-entry services,		
	career guidance and exploration, employment and		
	training.		
Strengthen and enhance the effectiveness and	Local area partners meet regularly to discuss		
efficiency of Maryland's Workforce System.	programming, services, and referrals. There is a		
	conscientious effort to avoid duplication and focus		
	on partners' strengths in the workforce development		
	area so each partner can use its limited resources		
	effectively and efficiently in the delivery of customer-		
	centered services.		

## **Target Populations**

The Board will develop strategies to provide intensive, individualized services to those who are WIOA eligible and suitable. Efforts related to this goal include the provision of work-based learning opportunities, access to in demand industry certifications, job readiness training, and relevant skill building efforts. In addition, we will seek to widen access and tailor services to people with disabilities, veterans, out of school youth, young adults with limited work history, those facing language barriers, those with criminal justice involvement, or who have other challenges to securing meaningful employment as defined by the WIOA and the Governor in Maryland's WIOA Plan:

- 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.

The Board will expand coordination with other local community agencies to strengthen program effectiveness and build a network of partners working together to co-create solutions for mutually served clients on their path to sustainable employment. Examples of these partners included:

- Department of Social Services/Family Investment Act Programs
- Division of Rehabilitation Services (DORS)
- Adult Education and Literacy
- Center of Independent Living/Freedom Center of Frederick
- Local Management Board and Frederick County Office of Children and Families
- Justice Jobs

The Board will prepare its customers and will integrate the vision of partner organizations to be inclusive for youth and individuals with barriers to employment. The Board will collaborate with its WIOA core program partners to apply job-driven strategies in the one-stop system and innovatively align employment, training and education programs to meet performance accountability measures.

Negotiated Performance Evaluation Measures

		Frederick	State Standard
	Performance Measure	Performance	
Employment Rate QTR2	Local Adjusted Employment Rate QTR2 Adult		
	Adults	76%	76%
	Local Adjusted Employment Rate QTR2 DW		
	Dislocated Workers	80%	80%
	Local Adjusted Employment Rate QTR2 LX		
	Labor Exchange	59%	59%
Employment Rate QTR4	Local Adjusted Employment Rate QTR4 Adult		
	Adults	72%	72%
	Local Adjusted Employment Rate QTR4 DW		
	Dislocated Workers	76%	76%
	Local Adjusted Employment Rate QTR4 LX	/	
	Labor Exchange	58%	58%
Median Earnings	Local Adjusted Earnings Standard Adult		
	Adults	\$7,000	\$6,300
	Local Adjusted Earnings Standard DW		
	Dislocated Workers	\$9,000	\$8,200
	Local Adjusted Earnings Standard LX		
	Labor Exchange	\$6,700	\$5,600
	Local Adjusted Earnings Standard Youth		
	Youth	\$3,900	\$3,410
	Local Adjusted Employment Rate QTR2 Youth		
Youth Education and Employment Rate QTR2		70%	69%
	Local Adjusted Employment Rate QTR4 Youth		
Youth Education and Employment Rate QTR4		65%	64%
Credential Attainment	Local Adjusted Credential Attainment Adult		
	Adults	59%	61%
	Local Adjusted Credential Attainment DW		
	Dislocated Workers		56%
	Dislocated Workers	56%	30%
	Local Adjusted Credential Attainment Youth		
	Youth	62%	62%
Measurable Skills Gains	Local Adjusted MSG Adult		
	Adults	55.0%	53%
	Local Adjusted MSG DW		

### Section 3 – Strategic Planning to Strengthen the Local Workforce System

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

This section should speak to the fifth Strategic Goal and include –

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

The local Board will use the Memorandum of Understanding (MOU) and Resource Sharing Agreement (RSA) process in order to specify additional expectations and conditions as it relates to the provision of WIOA partner services in the American Job Center (AJC) in Frederick County. WIOA partner staff will receive regular service and program updates and work together to coordinate resources and services for customers.

Quarterly local WIOA convenings have led to increase program staff knowledge across WIOA core partner programs. Staff have developed a desk-guide, complete with contact information and program descriptions to assist practitioners within each of the WIOA partners make appropriate referrals and assist in connecting individuals to services they need to be successful.

The one-stop operator will develop a continuous improvement plan for the AJC and will coordinate with partners to create and implement a plan. Customer service training as well as frequent presentations from WIOA partners and community based organizations ensure AJC staff have the tools necessary to deliver effective services and/or make appropriate referrals to job seekers and businesses.

WIOA Title I and partners Wagner-Peyser, Trade, Reemployment, Veterans employment services, Division of Rehabilitation Services (DORS), and TANF are coordinated through regular communication and colocation of program staff in the comprehensive AJC. In the virtual environment, meetings are held quarterly and participation from the partners is robust. In addition, in 2018 Workforce Services created a grant-funded position specializes in working directly with the adult education and English Language Learner populations from Frederick Community College. This provides a direct connection between program participants and a natural pathway from education to career planning and job training supported by Title I.

Department of Social Services/Temporary Cash Assistance (TCA) employment services will be coordinated and aligned through regular communication, meetings, and joint initiatives and projects. Frederick's TCA partnership transition under WIOA has been in effect since 2018. Frederick County's Department of Social Services has assigned a TCA case management specialist to the AJC full time. Customers have one-stop access to applying for social assistance as well as access to employment and training programs offered through the AJC. Discussions on co-case management strategies are underway.

(B) A description of the workforce development system in the Local Area that identifies the programs that are included in that system and how the Local Board will work with the entities carrying out workforce development programs identified in the State Plan. The description should also include how the Local Board and the programs identified plan to align and integrate to provide services to customers. The description

should also include programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.).

Frederick County Workforce Services and Youth Adult Education and Family Literacy – WIOA Title II Wagner-Peyser Act Program — Title III Vocational Rehabilitation Program — WIOA Title IV Temporary Assistance for Needy Families/Temporary Cash Assistance/TCA Trade Adjustment Assistance for Workers Program Jobs for Veterans State Grant Program Reintegration of Ex-Offenders Program (if applicable) Title V of the Older Americans Act of 1965 (A2 U.S.C. 3056 et seq.) activities Career and Technical Education programs at the post-secondary level authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.)  Community Services Block Grant Act (42 U.S.C. 9901 et seq.) employment and training activities Programs authorized under State unemployment compensation laws  Housing and Urban Development (HUD) program- Employment and training programs YouthBuild (WIOA Title I) Not applicable in the local area.  Maryland Department of Labor Not applicable in local area Jewish Council for the Aging Frederick Community College  **City of Frederick, Department of Housing and Human Services  **City of Frederick, Department of Labor  Maryland Department of Labor  Not applicable in the local area.  **City of Frederick, Department of Labor  Maryland Department of Labor  Not applicable in the local area.  **Moral Department of Labor  **Moral Department of Labor  **Not applicable in the local area.  **Moral Department of Labor  **Maryland Department of Labor	Program	Partner in Local Area/Plan
Adult Education and Family Literacy – WIOA Title II Wagner-Peyser Act Program – Title III Maryland Department of Labor Vocational Rehabilitation Program – WIOA Title IV Temporary Assistance for Needy Families/Temporary Cash Assistance/TCA Trade Adjustment Assistance for Workers Program Jobs for Veterans State Grant Program Reintegration of Ex-Offenders Program (if applicable) Frederick County Department of Social Services – Family Investment Act Maryland Department of Labor Maryland Department of Labor Maryland Department of Labor Not applicable in local area.  Jewish Council for the Aging Frederick Community College  Maryland Department of Labor Not applicable in local area.  Jewish Council for the Aging Frederick Community College  Frederick Community College  Maryland Department of Labor Not applicable in local area.  Jewish Council for the Aging Frederick Community College  Frederick Community College  Maryland Department of Labor Not applicable in local area.  Frederick Community College  Maryland Department of Housing and Human Services Programs authorized under State unemployment compensation laws  Maryland Department of Housing and Human Services  Maryland Department of Labor Not applicable in the local area.  Maryland Department of Labor Not applicable in the local area.  Frederick Community College  Maryland Department of Housing and Human Services  Frederick Community College  Frederick Community College  Frederick Community College  Frederick Community College	WIOA Title I – Adult, Dislocated Worker	Frederick County Workforce Services
WIOA Title II Wagner-Peyser Act Program — Title III Vocational Rehabilitation Program — WIOA Title IV  Temporary Assistance for Needy Families/Temporary Cash Assistance/TCA Trade Adjustment Assistance for Workers Program Jobs for Veterans State Grant Program Jobs for Veterans State Grant Program Itile V  Amayland Department of Social Services — Family Investment Act Maryland Department of Labor Mot applicable in local area.  Jewish Council for the Aging  Weish Council for the Aging  Weish Council for the Aging  Frederick Community College  Frederick Community College  Frederick Community College  Frederick Community College  Wash Council for the Aging  Frederick Community College  Frederick Community Co	and Youth	
Wagner-Peyser Act Program — Title III Maryland Department of Labor Vocational Rehabilitation Program — WIOA Title IV  Maryland Division of Rehabilitation Services  Maryland Division of Rehabilitation Services  Maryland Division of Rehabilitation Services  Frederick County Department of Social Services — Family Investment Act  Maryland Department of Labor  Not applicable in local area.  Jewish Council for the Aging  (42 U.S.C. 3056 et seq.) activities  Career and Technical Education programs at the post-secondary level authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.)  Community Services Block Grant Act (42 U.S.C. 9901 et seq.) employment and training activities  Programs authorized under State unemployment compensation laws  Housing and Urban Development (HUD) program- Employment and training programs  YouthBuild (WIOA Title I)  Indian and Native American Programs (WIOA Title I) (if applicable)  National Farmworker Jobs (NFJP)/Migrant and Seasonal Farmworker Programs (WIOA Title I) (if applicable)  Maryland Department of Labor  Maryland Department of Labor  Maryland Department of Housing and Human  Services  City of Frederick, Department of Housing and Human  Services  Maryland Department of Labor	Adult Education and Family Literacy –	Frederick Community College
Vocational Rehabilitation Program — WIOA Title IV  Temporary Assistance for Needy Families/Temporary Cash Assistance/TCA Trade Adjustment Assistance for Workers Program Jobs for Veterans State Grant Program Reintegration of Ex-Offenders Program (if applicable) Title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.) activities Career and Technical Education programs at the post-secondary level authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.)  Community Services Block Grant Act (42 U.S.C. 9901 et seq.) employment and training activities Programs authorized under State unemployment compensation laws  Housing and Urban Development (HUD) program- Employment and training programs YouthBuild (WIOA Title I) Not applicable in the local area.  Maryland Department of Labor  Maryland Department of Housing and Human Services  Trade Adjustment Act Maryland Department of Labor  Maryland Department of Housing and Human Services  Maryland Department of Labor	WIOA Title II	
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Corps Centers		'

### Additional Workforce System Partners Include (but are not limited to):

- County and City Offices of Economic Development
- Entities serving those involved with the justice system
- The Freedom Center/Center for Independent Living
- Goodwill Industries of Monocacy Valley
- Frederick Community College
- Family Partnership of Frederick County
- Frederick Rescue Mission
- Asian American Center

Frederick County's local workforce system is one built on collaboration and coordination. The county is known for being a well-networked community. Wagner-Peyser, TAA, UI, JVSG, DORS, TCA/TANF and WIOA adult and dislocated worker programs are currently co-located at the Frederick County American Job Center in Frederick. The County Executive and Workforce Development Board work in collaboration to foster partnerships for efficient and effective delivery of workforce programs.

There is routine communication and collaboration with WIOA and workforce system partners to ensure effective delivery of programs and services and plans to continue to do so. Examples include:

- Bi-monthly meetings with business services representatives from WIOA, DORS, Economic Development (State, County and City entities) and Frederick Community College partners
- Jointly participate in business visits and partner on recruitment and training solutions
- Monthly staff meetings include Wagner-Peyser and WIOA program staff.
- Partner with DORS on recruitment events; Cross promote job events
- Communication and collaboration with Perkins Act administrator, Frederick Community College.
- Staff serve and participate on advisory Boards for Frederick County Public Schools Career and Technology Education (CTE), Frederick Community College program advisory committees
- Staff provide mock interviews for Career and Tech Education and public school students
- Board partners with Career and Tech Education on promotion of Youth Apprenticeship program
- Business Services staff partner with CTE programs to connect trained youth to employment and career opportunities
- FCWS provides job search strategy and coordinates expungement workshops for persons involved in the justice system

#### Integration of Services and Improved Coordination of Information

The Board supports the efforts of all partners to work closely with key and required partners to streamline services, develop stronger referral processes and create and support an employment continuum built on evidence-based practices. Participation in the meetings has been positive and productive and the system partners agree to continue to move forward in the development of an integrated service delivery model.

Local workforce system staff have access to a Google Site established by the one-stop operator. This site houses WIOA Convening Training Materials, Program and Services Menus for each partner, contact information, and referral forms.

In addition, to support accessibility of services to those in need and as resources allow, the Board, WIOA partners and FCWS will explore partnerships with the public library system, City of Frederick Housing Authority, Frederick County Housing Department, Freedom Center (Center for Independent Living), Goodwill Industries of Monocacy Valley, Mountain Manor, Community Action Agency, Rescue Mission, and other community-based programs and organizations. In doing so, we will leverage the strengths and resources of each, reduce duplication, and increase opportunities to offer comprehensive approaches to addressing employment and education gaps.

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

The Board is developing deeper connections with partnership programs that support individuals to match employment programming more closely to each person in need. Specifically, FCWS staff is engaging in discussions and planning with case management and program leaders from:

- Department of Social Services/Family Investment Act Programs
- Division of Rehabilitation Services
- Adult Education and Literacy Provider/Frederick Community College

The Board and WIOA partners will engage in further discussions to strategize the development of career pathways, co-enrollment, and leveraging of supportive services in order to support the needs of customers with barriers to employment. Continued efforts are expected to outreach to individuals with barriers to employment and co-enrollment of customers which may include, but are not limited to DSS/TCA, Justice Involved individuals and Youth/Young Adults with the goal of meaningful activities leading to self-sustainable employment in key sectors.

Workforce Services uses a combination of new worker training and incumbent worker training to support the economic mobility and credentialing of the under and unemployed. Individual training accounts as well as contracted training programs are only supported if they lead to careers that offer family-sustainable income opportunity. Co-enrollment in programs will be considered (except for required co-enrollment for TAA) based on partner service offerings as well as the individual circumstances.

The local partners have held many discussions on how to reduce the "fatigue" associated with customers who benefit, or who could benefit, from multiple programs but due to administrative burdens, end up confused and overwhelmed. It is the hope and goal of the local area workforce system to work to reduce duplicative efforts

on documentation collection and service visits whenever necessary. More work and planning is needed in this area.

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

At the fall 2020 quarterly partner meeting, each partner was presented with information on the formulation of the local plan and an invitation to participate. Each partner was subsequently provided the latest draft of the local plan and given a month to review, edit, comment on any section.

#### (E) A description of the strategies and services that will be used in the Local Area—

- To facilitate engagement of businesses, including small businesses and businesses in in-demand industry sectors and occupations, in workforce development programs;
- To support a local workforce development system that meets the needs of businesses in the Local Area;
- To better coordinate workforce development programs and economic development; and
- To strengthen linkages between the AJC delivery system and Unemployment Insurance programs.

#### Business Engagement Strategies and Outreach Activities

- o FCWS business services are delivered and coordinated through a well-networked system of partners including:
  - County and Frederick City Offices of Economic Development
  - Small Business Development Center (which provides workshops at the American Job Center) and Maryland Women's Business Center
- FCWS business representatives actively participate in the statewide Business Services work groups, including participation in WIOA workgroups for the purpose of streamlining services offered to businesses, tracking service delivery and outcomes, and aligning business/industry outreach efforts with other partners.
- Workforce Development Board members are active and effective ambassadors to the business community.
- FCWS staff will design solutions for industry leaders who want to access apprenticeship, on the job training, incumbent worker training, or other services that can help businesses thrive.
- WIOA partners who have business staff will participate in forums and other structured educational activities that help businesses address current and future workforce issues.
- o FCWS Business Services Representatives (BSRs) have been assigned to each targeted industry and given specific responsibilities to collaborate with and engage businesses beyond the scope of simply posting open positions.
- Workforce solutions will be planned and delivered through coordinated efforts with business staff from WIOA partner organizations.

- o The Board and WIOA partners will increase efforts to coordinate with adult education and literacy providers, and other workforce system partners to address workforce solutions for businesses.
- o FCWS and the local Board will continue to seek industry input on career pathways and recognized industry credentials to support investment of WIOA funds into training and workforce programs that are in-demand.
- o The local Board will continue to monitor local and regional labor market trends to be effectively responsive to industry needs.
- The local Board will continue to seek out methods of sharing data and outcomes related to serving and engaging businesses.

Participation in the statewide business services meetings coordinated through the State Department of Commerce and/or local economic development offices, trainings, and activities allows the Frederick team to develop regional relationships and work with staff in sister workforce areas to provide seamless services to businesses throughout the region.

## Strengthening Linkages between the American Job Center delivery system and Unemployment Insurance Programs

WIOA partners maximize all available resources and tools to ensure that all job seekers will have full access to information on jobs. WIOA and Wagner-Peyser staff provide a variety of high-quality career services in a customer-centered approach environment to include, but is not limited to; job search navigation, career and skills assessment, labor market information, and other workforce development activities associated with the employability development of customers.

Services are delivered in one of three modes including self-service, facilitated self-help services and staff assisted service delivery approaches. Depending on the needs of the labor market other services such as job seeker assessment of skill levels, abilities and aptitudes, career guidance when appropriate, job search workshops and referral to training may be available when deemed appropriate.

Our workshops and assessments are widely promoted to our customers to assist in enhancing their employment ability. FCWS publishes a monthly schedule of comprehensive workshops and one-on-one services, such as the "Resume Doctor" service. In addition, FCWS utilizes the platforms of Twitter and Facebook to post upcoming events, notifications of job openings and hiring events, and other job seeker and business information.

WIOA program staff at Workforce Services hold hiring events and specialized informational sessions that are targeted to specific populations which may include, but are not limited to; DSS/TCA, Justice Involved individuals, Individuals with Disabilities, Mature Workers, Veterans and Youth/Young Adults.

Staff frequently do briefings during Maryland's unemployment insurance programs offered at the American Job Center. These include the Reemployment Services and Eligibility Assessment (RESEA) and

Reemployment Opportunity Workshop (ROW). FCWS business services staff share information with the unemployment insurance claimants on available jobs and hiring events, as well as information on connecting to the business services team to increase participant access to employment opportunities. RESEA and ROW workshop facilitators provide information on WIOA programs, including training, to participants as well.

Internal comprehensive meetings with leadership, as well as frequent communication with counterparts from the Department of Labor, Licensing and Regulation, address the services provided by Wagner-Peyser staff to avoid duplication of services.

WIOA partners may seek technical assistance from the state to assist the capacity of staff knowledge in providing customers with meaningful information and assistance in filing for unemployment insurance benefits.

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

Since 2010 there has been a non-voting position on the local board designated for an Employment and Training Specialist. This member provides key insight from a job seeker perspective. In addition, the One-Stop Operator conducts customer service surveys and feedback to share with the Board. When there are major programmatic or policy changes, the Board uses a variety of communication methods to solicit input and/or inform job seekers of any changes.

- (G) A description regarding the implementation of initiatives designed to meet the needs of businesses in support of the strategy described in Section 1, including, where applicable:
  - EARN Maryland,
  - Pre-apprenticeship and Registered Apprenticeship,
  - Incumbent worker training programs,
  - On-the-job training programs,
  - Customized training programs,
  - Industry and sector strategies,
  - Integrated education and training,
  - Career pathways initiatives,
  - Utilization of effective business intermediaries, and
  - Other business services and strategies.

Frederick County Workforce Services operates on the belief that strategic partnerships with higher education and economic development entities and business/industry are essential for providing demand-driven employment and training services. FCWS seeks input from local businesses, uses tools for labor market analysis to determine high-priority industries. Labor Market Information will be used to align outreach and development of sector partnerships for high growth/high demand industries and facilitate advancement of workers at all skill levels.

The local board does not currently operate any programs under EARN. FCWS staff do support EARN initiatives by sharing outreach and promoting training opportunities funded under this program. The incumbent worker training program is fairly robust and Title I Business Services staff administer that program to mostly small businesses. They provide the outreach and oversight of the Frederick Business Works program.

Career pathways programming is intertwined with business, youth, and WIOA adult programming. Career assessment and provision of labor market information, including earning potential, is provided in both virtual class size methods as well as individually as needed.

FCWS, the Board and partners will continue to focus on building business service strategies to meet the skill, recruitment and retention needs of employers and career advancement needs of workers. Business services representatives will work towards engaging employers, community partners, and other stake holders in business-driven initiatives such as EARN Maryland, incumbent worker training programs, and similar programs designed to promote career pathway/progression, growth towards self-sufficient wages, and economic growth.

Business engagement is a key priority, and a number of strategies are used to work with those who require workforce supports. Direct outreach, participation in professional associations, Chamber of Commerce membership, networking and following up on referrals from Economic Development entities is also key to reaching businesses who have workforce needs.

(H) A description of how the Local Board will coordinate workforce development activities with economic development activities for the Local Area, and promote entrepreneurial skills training and microenterprise services.

WIOA program staff are part of the Workforce Services Department within the County's Office of Economic Development. This arrangement lends itself well to Board efforts in partnership and collaboration. In addition, the Directors of both the County and City Offices of Economic Development serve on the Board. Collaboration occurs on procurement fairs, job fairs, business meetings, as well as sharing of business trends and labor market information. FCWS provide valuable labor market and wage data for economic development partners working with business prospects.

The Small Business Development Center, Women's Business Center both provide workshops in the American Job Center regularly for individuals interested in entrepreneurial and start up opportunities. In addition, economic development entities frequently refer Frederick Innovative and Technology Incubator entrepreneurs to Workforce Services for assistance in recruitment and hiring of their first employees.

The Board will explore additional ways to learn about and promote entrepreneurial skills training as a viable path to careers and employment.

The connectedness of economic and workforce development activities is key in ensuring businesses have an existing and future skilled workforce. Economic development partners collaborate regularly with the FCWS business team, and the staff are included on meetings related to the attraction and retention of businesses in the local area. FCWS assists in the economic vitality of local businesses by providing incumbent worker solutions, new hire solutions (OJT, recruitment assistance, etc.), access to key labor market and wage data, as

well as brokers connections to all workforce intermediaries and partners who can develop strategies to recruit and train skilled workers.

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

Supportive Services for dislocated workers and adults are authorized under the 2014 Workforce Innovation and Opportunity Act (WIOA). In the context of a coordinated one-stop delivery system, Frederick County Workforce Services shall take into consideration all of the available supportive services resources so that participants may receive the best supportive services available and to ensure that funds are spent to maximize participants' opportunity to be successful in career and training services. Currently a Workforce Services staff person serves on the Local Management Board and acts a liaison which helps coordinate efforts and services.

Staff follow the local policy on supportive services, which reads in part:

Supportive Services for dislocated workers, adults, and youth are authorized under the 2014 Workforce Innovation and Opportunity Act (WIOA). In the context of a coordinated one-stop delivery system, Frederick County Workforce Services shall take into consideration all of the available supportive services resources so that participants may receive the best supportive services available and to ensure that funds are spent to maximize participants' opportunity to participate in career and training services. Supportive service requests must be reasonable in nature and only requested if staff, in collaboration with the participant, establish a demonstrated need and that the support will help the participant move toward self-sufficiency.

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

The Board maintains a private-sector majority with representatives from the biotechnology, IT, healthcare, manufacturing, and professional services sectors. Board members and economic development partners are thoroughly embedded in the local business community and provide strong linkages to avenues for businesses to share concerns and ideas regarding workforce development needs.

The Board will facilitate input from industry and businesses to supplement labor market data to best align training funds with demand. Periodic surveying, focus groups, business education events, and other strategies to share and incorporate business input will be explored.

Active participation and engagement are planned with the following groups and Boards (list is not exhaustive):

- County Executive's Office
- •Frederick County Office of Economic Development
- •City of Frederick Office of Economic Development

- •Frederick County Chamber of Commerce
- •Frederick Innovative Technology Center
- •Frederick County Public Schools Career Advisory Council
- •Workforce Services Business Services Team

Bi-monthly meetings with FCWS business services staff, economic development staff, community college training staff, and DORS business representatives will serve as a primary arena for gathering and sharing business intelligence and needs around workforce training and hiring. These meetings allow staff to share collectively, business feedback received from the various organizations, digest it, and develop plans to address those needs.

FCWS business services staff are routinely integrated in industry-related associations such as the Manufacturing Roundtable, the Frederick Chamber of Commerce, local chapter of the Society for Human Resource Management, and the Frederick County Builders Association. Through these connections, as well as through daily interaction with businesses, economic development groups the team will be well positioned to propose workforce solutions for businesses. Proposals for training and workforce development solutions will include industry-input on skills, credentials at the inception of the planning process and gather input on training delivery methods, industry recognized training providers/programs that work best for that industry.

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

The Board will continue to identify industry groups and work with WIOA and workforce system partners to cultivate industry-led partnerships. Career pathways and industry-led partnerships are new endeavors and approaches to solving workforce challenges. The Board will explore strategies that take industry needs, convene relevant stakeholders including training providers, and WIOA partners to establish meaningful training options that provide both entry level and skilled workers with mobility within industries.

For the duration of this plan, FCWS and WIOA partners will continue to seek out educational and professional development opportunities to adjust programming to support career pathways. Frederick Community College has begun planning career programs and training options that match the area's high demand industries. The Board and WIOA partners will consider target populations, as well as industry needs in designing and working collaboratively on any career pathway initiative. FCWS has developed an extensive educational website featuring career pathways and labor market data for the county's high demand industries. FCWS and Frederick Community College career program staff meet at least twice a year to understand the offerings in workforce training and how they match industry and occupational demand.

EARN opportunities are promoted to local industry groups, including the Manufacturing Roundtable and Tech Frederick. FCWS staff will continue to promote and whenever possible, facilitate business and industry connections to EARN as a solution for businesses.

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

FCWS and the Board may explore ways to partner with local faith or community-based organizations. FCWS has traditionally enjoyed strong partnerships with community-based organizations such as Goodwill, Rescue Mission, Way Station, and others.

Section 4 – American Job Center Delivery System

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

(A) A list of the AJCs in the Local Area, including address and phone numbers. Indicate the One-Stop Operator for each site and whether it is a comprehensive or satellite center.

Frederick County American Job Center (Comprehensive Center)

200 Monroe Avenue

Suite 1

Frederick, MD 21702

301.600.2255 (phone) 301.600.2906 (fax)

www.FrederickWORKS.com

BlueOps. Inc. is currently the One Stop Operator

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

Customers may access the American Job Center in several ways and initial contact may be in-person or virtual/remote. Generally, customers can choose from a variety of resources as an initial engagement point. Some may be referred from system partners/programs such as Maryland Department of Labor, Department of Social Services, or other community partners. Direct interaction with staff will trigger a brief triage to determine what brought them to the center and to direct them appropriately. During remote/telework operations, customers calling the AJC office number are briefly triaged. Between March 2020 - March 2021 most customers calling into the AJC had questions and concerns about unemployment benefits and how to apply.

When the center is open to customers, front desk staff enter triage information into a database that transmits the data to the resource room staff. Customers are issued a name badge which helps staff to greet customers by name and helps to identify Veterans as their name badges also print a US flag noting their military service.

The front desk staff direct new job seeking customers to the Resource Room, and they are then greeted and welcomed by staff, who can identify the customer's key needs by viewing their triage information in the database. Veteran customers immediately meet with a staff person to receive a needs assessment of Significant Barriers to Employment and if determined appropriate, may be referred to the Disabled Veterans Outreach Program Specialist for additional, individualized assistance. Other, customers needing assistance or accommodation are set up accordingly, and all new customers are oriented to the AJC services. All customers

receive instruction and staff assistance (as staffing levels allow) on registering in the Maryland Workforce Exchange.

Virtual options, phone lines and email communication may sometimes replace face to face triage and direction based on customer needs. Customers are guided to access points of available services/resources.

Customers can attend job search and/or computer seminars to sharpen their job-hunting tools. The Resource Room is available for those ready to do an active job search; Career Assessment and other skills assessment tools are always available for those exploring new opportunities. During remote operation, several resources are available digitally.

The calendar of events is available online at <a href="www.FrederickWORKS.com">www.FrederickWORKS.com</a>, and lists the majority of basic career level seminars and events, including job search and computer seminars, job fairs, special guest speakers/presenters, information sessions about training programs and recruitment opportunities, and employer panel discussions. FCWS uses a multitude of social media outlets to outreach and communicate to the public on job search and workforce development resources.

Customers can also sign-up to receive notification of news and events via email, which includes a subscription to the weekly Job Connect. This e-newsletter includes New Job listings, center events, weekly schedule of classes (virtual and in person), seminars, recruiting events, and other special events planned at the center, as well as job search tips and special features.

The use of technology to assist customers allows better flexibility, as some services are accessible from other locations. For example, career and skills assessments can be accessed from remote locations, and by using email, announcements of jobs and events are received at a time convenient to the customer. Social media is used to promote events and services.

Upon engaging with the AJC, customers always have the choice of staff assistance, as well as the pace of how they utilize our services. As there is no required sequence of service prior to meeting with a Registrar (who determines WIOA eligibility), the customer is given the ability to choose self-paced, self-selected workshops and services. The option to discuss individualized services is always available through customer determination or staff assessment.

If customers express interest in or a need for individualized services or a staff member determines through interaction with the customer that individualized services are appropriate customers are invited to attend the 3 Steps to Connect session which provides an overview of intensive level services and resources and outline basic eligibility criteria. During the session, individuals who desire so, can begin the steps to determine eligibility for title I services. If necessary, center staff accommodate individuals who are not able to attend the session in person. Referral to American Job Center partners and community resources is discussed for barrier removal or support, as appropriate and as needed.

If necessary, center staff work to accommodate individuals who are not able to attend the session in other ways. Referral to American Job Center partners and community resources is discussed for barrier removal or support, as appropriate and as needed.

After the customer decides with the staff member that moving forward with intensive level services is the next step, the customer is offered an appointment with the FCWS Registrar to verify eligibility for WIOA enrollment and complete a WIOA application. In addition, the customer reviews and signs the Grievance/Complaint Procedure and the Equal Opportunity Is the Law form.

Once the WIOA application process is complete and appropriate documentation collected, the Registrar assigns the customer to an Employment and Training Specialist (ETS). The Registrar works with the customer to schedule an initial meeting is typically offered the chance to meet that same day with their assigned ETS to begin a more intensive assessment and review process of the job seeker's needs and suitability for individualized services, including training if appropriate. Often the customer can meet with the ETS the same day.

The ETS and customer will develop an initial Individual Employment Plan (IEP) to identify customized employment goals and achievement objectives. Coaching and planning around labor market information and industry demand is integrated to ensure an appropriate employment goal. IEP development is conducted jointly between the individual and an Employment and Training Specialist and is reviewed and updated regularly. The Youth Program Specialist and youth customers develop an Individualized Service Strategy (ISS) to identify customized employment and educational goals. The ISS is revisited at least every 90 days while youth customers are engaged in WIOA services.

FCWS provides case management for all customers enrolled in the WIOA grant for intensive services. Case management by the customer's assigned Employment and Training Specialist and other support staff will include but may not be limited to, as appropriate and applicable to the individual customer, any or all of the following:

- Additional assessment of the customer's skills, interests and abilities;
- > IEP development with periodic review and updates, conducted jointly with the customer;
- Regular, meaningful contact with the customer of not less frequently than once every 6 weeks to discuss goals, job search activity and, if applicable, training progress;
- Guidance and resources towards achieving identified goals.
- ➤ Referrals to other WIOA partners and/or community resources
- Access to Supportive Services (if) needed to participate in job search or training activities.
- ➤ Documentation, within the MWE database, and the permanent case file, of all funded services including training approval, supportive services and work-based learning services, in accordance with the local area case file management policies; and
- Documentation of any employment outcomes, and as appropriate, follow-up services as described below.

To support the goal of job retention, wage gains, and career progression for participants who obtain unsubsidized employment, follow-up services are provided for at least 12 months as appropriate.

Documentation describing the follow-up services and including the ending of follow-up services will be maintained in the MWE case file for each participant.

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

The Local Board will follow the procurement rules of Frederick County Government.<sup>16</sup> The Board will convene a selection committee to review proposals according to County rules and select the operator.

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

The local Board has traditionally maintained a strong focus on continuous improvement as an ongoing effort to improve products, services, processes, and access to resources. The Board will review the performance outcomes for Eligible Training Providers that receive Frederick County area WIOA Title I training funds and will encourage Eligible Training Provider representatives to participate in engaging employers to strengthen the relationship between training and employment outcomes.

The Board will also review American Job Center service offerings and one-stop operator reports to provide feedback on areas for continuous improvement. The Board will work with the one-stop operator to assess services and identify continuous improvement goals, coordinate the implementation of plans with the AJC partners.

The Board and the WIOA partners are committed to engaging employers in the ongoing analysis of the necessary credentials that job seekers need to qualify for a job, retain a job and also to continue to progress in a career pathway. Through the FCWS business services team, WIOA partners, and economic development partners, the Board will seek regular feedback from businesses in order to align workforce strategies that are demand-driven in nature.

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

WIOA partners will collaborate with the one-stop operator to provide outreach and services to target populations who may not be accessing services through the physical AJC. At the time of this writing, all partners are offering services virtually for all customers and participants. Using a combination of virtual meeting platforms, tele-meetings, and the ability to review and accept documents remotely, customers have full access to services.

<sup>16</sup> https://www.frederickcountymd.gov/DocumentCenter/View/20295/Purchasing-Rules-and-Regs-effective-01-01-10?bidId=

FCWS staff may provide orientation to WIOA Title I services in libraries throughout the county. FCWS has also partnered with the State's Attorney's office and county parole and probation representatives to provide targeted job search information and expungement services for returning citizens.

Even before the impacts of COVID-19, Frederick County Workforce Services had increased use of technology to provide services to individuals who choose not to access the physical location. Recently use of technology to reach remote areas has expanded and currently includes:

- > Growth of Social Media Platforms to disseminate information about services, job opportunities, recruitment events, classes, etc.
- Local Landscape sites on Frederickworks.com to provide education about HG/HD industries in Frederick County
- ➤ Workforce Wire video broadcast, Job Connect subscription-based email, You Tube Channel,
- Virtual Programming using a variety of platforms (classes, info sessions, recruitment events, employer spotlights)
- Metrix learning platform to offer valuable classes and education for the public.
- Accessibility by phone and email, and virtual platforms, located at FCC/Adult Ed classes off-site and remote registrations.
- (F) A description of the roles and resource contributions of the AJC partners. DWDAL's policy on Memoranda of Understanding and Resource Sharing Agreements can be found here: http://www.labor.maryland.gov/employment/mpi/mpi9-16.pdf.

Frederick County AJC partners participate actively in discussions with the one-stop operator to negotiate contributions to the center as well as to coordinate referrals across service providers. Partners use the MOU and Resource Sharing Agreement to memorialize contributions and service delivery strategies. Referrals are a primary way to engage customers with other partners and a new referral system was developed by all the partners in 2018. Recognizing the impact of the pandemic, service delivery models may change over time. All partners meet quarterly to discuss resources and service strategies.

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

Labor Market data is readily used by the Board and by FCWS staff as a key component in providing quality career counseling to participants to provide direction for career development along pathways that demonstrate a potential for individuals to maintain stability. FCWS coordinates support of priority industries through career and training programming in high-growth, high demand industries and occupations. Approved training requests are on a case-by-case basis and include a thorough evaluation of the related marketability of skills/credentials resulting from successful completion of training.

In occupations where no local eligible training provider is available, out of area training providers within a reasonable commuting distance are evaluated. In an effort towards creating a stronger alignment of available and approved training providers with occupations represented in the local priority groups, staff will continue to

collaborate with local colleges and other high quality training vendors to identify area training needs and develop programs for possible inclusion as an approved training provider.

Business engagement is invaluable in the discussion and development of occupational training in line with local area needs. FCWS staff and local Board members are proactive in engaging businesses in the identification of occupational skill training that will lead related occupational growth and demand, wage potential that lead to financial independence, and opportunity to move through career ladders via stackable credentials and continuous learning.

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

The Local Board through FCWS shall apply the following for priority of service for WIOA Title I Adults:

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

Priority of Service is documented during (or before) the registration process to determine program eligibility. Documentation is collected and reviewed for proof priority of service and reflected in WIOA registration process in the Maryland Workforce Exchange and may also be documented in case notes.

No denial of service to non-targeted customers is anticipated. Program management routinely evaluates budget and expenditures and may determine to institute priority of service in certain circumstances. In all cases, FCWS reserves the right to institute its most in need and most likely to benefit from WIOA Adult services policy if, based on its experience with local economic or other variables, it determines that there is a reasonable probability that there will be a deficiency of resources. In determining need for training, WIOA funds will always be considered supplemental, and applicants will first be required to seek training funds from other sources, including the Pell grant. The local area also has discretion to leverage non-WIOA funding to expand its reach and impact to Frederick County residents.

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.

### **WIOA Target Populations**

For WIOA Title I Adult Program employment and training services, FCWS will provide priority of service to individuals in the following target populations, in accordance with WIOA and State issued policy:

- 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 2 years of exhausting lifetime eligibility under Part A of Social Security Act
- Individuals who are English language learners
- Individuals who are unemployed, including the long-term unemployed

- Individuals who have low levels of literacy
- Individuals without a high school diploma
- Low income individuals, including TANF and SNAP recipients
- Long-term unemployed individuals
- Native Americans, Alaskan Natives, and Native Hawaiians
- Older individuals
- Single parents (including single pregnant women and non-custodial parents)
- Veterans
- Youth who are in, or have aged out of, the foster care system

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

Career progression is at the heart of WIOA legislation and the Maryland State Plan, and incumbent worker training allows individuals to stay marketable and progress in their careers and allows businesses to remain competitive. Skilled talent is a top priority for successful businesses to continue to support the economic development in our area.

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. The local policy governs the guidelines staff use to implement an incumbent worker program.

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

The local Board along with WIOA partners, with the help of the one-stop operator, meet regularly to assess the need for staff training and enhancing the customer experience. AJC center staff have had access to training in communication, program/service offerings, delivering business services, online training modules to assist individuals with disabilities, and even CPR training and certification to handle emergency situations. Staff are also encouraged to make suggestions for training needs that lead to achieving excellence in service delivery and provide efficient and friendly customer service. The AJC staff share the goal of putting the needs of the individual at the forefront, without reference to programmatic silos or bureaucracy.

Section 5 – Title I – Adult, Youth, and Dislocated Worker Functions This Section should include –

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

Adult and Dislocated worker services are available through the American Job Center in Frederick and delivered in collaboration with area partners.

The table below outlines services available:

ON DEMAND	INDIVIDUALIZED	TRAINING
Intake and Assessments		
At the first engagement, customers are triaged and are directed as appropriate. Customers receive orientation to information and other services provided. There may be an initial assessment of skill levels and supportive service needs.	Customers are identified as needing more intensive services and one-on-one counseling with an Employment and Training Specialist. These services would include above and beyond services offered at the basic level.  Determination of eligibility to receive assistance.	Labor Market Information  Priority of Service  Current skills/marketability  Determination of need for training.
Eligibility Determination		
Informal assessment and invitation to attend information session about Individualized services and/or scheduled appointment for eligibility determination.	Eligibility criteria review and validation (legal work status, selective service registration, veteran status, family size, family income, etc.)	Priority of Service Income evaluation
	Priority of Service determination.  Documentation required for eligibility is collected and verified,	Assistance in completing a training application which may include supporting LMI, informational interviews, job leads, meeting with a college-level advisor to discuss academic and career option that

WIOA application completed Appointments with ETS staff are often available the same day result in credentialing and license attainment.

Determination of unlikely or unable to obtain or retain employment that leads to economic selfsufficiency.

In need of training to upgrade skills.

In need of training services to obtain or retain employment that leads to economic self-sufficiency.

Approval of the occupational or classroom curriculum using the Maryland WIOA Eligible Training Provider

List.

### **Employment and Training Assistance**

Services available for job search assistance are detailed in monthly calendar, on the FCWS website.

Labor exchange, LMI, job vacancy listings, Job search classes, information on nontraditional employment, individual resume review and practice interviews.

Customers have access to recruitment events employer information sessions.

Resource room usage, including resource room staff assistance.

Initial appointments include informal and/or formal assessment of needs.

Development of an individual employment plan (IEP).

Referrals to partners

Evaluation of Supportive Service needs

Assistance in establishing eligibility for programs of financial aid assistance for

Availability of funding.

Comprehensive and specialized assessments of the skill levels and service needs to determine appropriateness and need for training.

Customers have access to ETPL.

ETS staff evaluate any potential barriers to successful completion of training, and explore supportive services.

Coordination with training vendor.

	·	
Maryland Workforce Exchange Information and assistance regarding filing claims for unemployment compensation	training and education programs that are not funded under WIOA.  In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals.  Discussion of career pathways to attain career objectives.  Availability of internships and work experience linked to careers in high growth/high demand industries.	Assistance in establishing eligibility for programs of financial aid assistance for training and education programs that are not funded under WIOA.  Access to occupational skills training, incumbent worker training, on-the-job training, and work based learning opportunities
Case Management		
n/a	Prepare and coordinate comprehensive IEP  Provide job and career counseling during program participation and after job placement.  Regular contact and availability of ETS staff.  Employer vacancy notifications.	Support to successfully complete training.  Credential attainment
Referral to Partners		
Informal assessment & Referral as appropriate via MOU	Informal assessment & Referral as appropriate via MOU	Informal assessment & Referral as appropriate via MOU
Supportive Services		

Based on availability to support job search and successful employment in accordance with local policy	To mitigate barriers to successful employment in accordance with local policy.	To mitigate barriers to successful completion of training and credential attainment in accordance with local policy.
Follow-up Services		
Informal and limited follow-up services may be provided to address specific situations.	Designed to provide support for job retention.  Celebrate successes.  Provided according to policy.	Designed to provide support for successful training completion, credential attainment to support career pathways and to support job retention.  Celebrate successes.  Provided according to policy.

Customers seeking training in the local area are limited by a small list of eligible training providers/ and/or approved programs. To enhance customer choice, out of area providers are often explored if feasible for the customer. FCWS continues to work with training vendors and the state towards building a more robust local training provider list. Contract<sup>17</sup> training may be used as a viable solution and may be procured through Frederick County Government Procurement and Contracting Department.

Alternative options may be explored if possible to offer training in high-demand industries/occupations and skill areas. Contract training, industry partnerships, cohort model training and other options may be used to develop a well trained workforce to meet the needs of businesses.

(B) A description of how the Local Board will coordinate workforce development activities carried out in the Local Area with statewide rapid response activities, as described in Section 134(a)(2)(A). DWDAL's policy on Rapid Response can be found here: http://www.labor.maryland.gov/employment/mpi/mpi5-18.pdf.

Rapid Response services are designed to respond to mass layoffs and other events that cause significant unemployment. The local Board will coordinate with statewide activities to provide early support and connection to employment and training services for participants who are affected by such events.

FCWS and the local Board have a strong connection with county and regional economic development and maintain regular communication to support employers at risk of layoffs. Collaboration between workforce

**<sup>17</sup>** 20 CFR § 680.320

development, economic development, elected officials and statewide activities are available to assist companies and dislocated workers with the goal of assisting workers in returning to work as quickly as possible. As many of our partners including state representatives are co-located, rapid response activities are coordinated quickly and tailored to the needs dictated by the situation. Using Rapid response funds, services may include information sessions at the employer's site or at the American Job Center, education around Unemployment Insurance, referral to local services and/or community partners and easy access to employment and training services.

The actual delivery of services to businesses will be customized to meet each individual business's needs. Information provided should include, at a minimum:

- an explanation of Unemployment Insurance,
- an overview of the American Job Center services
- Relevant employment and training services including information on TAA, Pell Grants, and the GI Bill are provided.

#### Examples of service delivery formats include:

#### Information Session/s

- Virtual or on-site informational sessions with groups of affected employees prior to layoff or afterwards.
- Virtual or in-person informational meetings with individual affected employees prior to layoff or afterwards
- Provision of information about the local labor market, job search resources and services offered in the workforce development system and community.
- Invitation to engage with FCWS or other partners as the public does, either prior to layoff or afterwards
- (C) A description and assessment of the type and availability of youth workforce development activities in the Local Area, including activities for youth who are individuals with disabilities, which description and assessment shall include an identification of successful models of such youth workforce development activities. DWDAL's policy on the Title I Youth Program can be found here: <a href="http://www.labor.maryland.gov/employment/mpi/mpi8-15.pdf">http://www.labor.maryland.gov/employment/mpi/mpi8-15.pdf</a>.

FCWS in conjunction with its youth services provider and community partners has successfully implemented a multi-tiered, comprehensive approach in individualized youth assessment, providing education, training, and employment services by integrating WIOA services with supporting services and leveraging partner programs to meet the needs of all youth, including youth with disabilities. FCWS staff are well connected to local public and private youth development efforts and those relationships are leveraged to connect youth to workforce development activities as appropriate. The local WIOA partners' referral process is leveraged to ensure appropriate WIOA Youth enrollments, including youth who are individuals with disabilities.

The following table outlines youth workforce development programs or activity in Frederick County, but is by no means all-inclusive, as the local area is continually enhancing its capacity to serve youth by expanding its programs and partnerships.

Youth Workforce Development Program/Activity	Program Description
YouthWORKS! Summer Jobs Program	6 week paid summer work experience with job readiness training, in a structured work environment to provide work-based learning opportunities to youth who face barriers to employment, including youth with disabilities and youth from families on public assistance.
Youth Pathways	4 month cohort program for out-of-school youth with their HS diploma but not otherwise meaningfully connected to postsecondary education or employment. Program emphasizes career pathway building and job readiness skills development coupled with work-based learning opportunities.
Job Corp	Prepares youth and young adults for employment and careers in various industries and includes certifications
DORSYear Round Work Based Learning Program	In partnership with DORS, facilitate work based learning opportunities for youth with disabilities, including youth attending the Maryland School for the Deaf residential high school program.
Frederick County Transition Fair	A partnership between the secondary school system, local community college, DORS, FCWS, and other community partners for a yearly event for high school students in special education or 504 plan services to look at life-after-school. Through presentations, workshops and activities, youth explore various education, employment preparation and other career services to begin planning for their transition.

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

Workforce Services and WIOA program staff will work with Frederick County Public Schools to identify areas for partnership in the delivery of career preparation education and activities. This will include identifying vocational and technical skills relevant to local in-demand jobs. The Local Board supports WIOA partners and Workforce Services in collaborating with school guidance counseling to make information about the American Job Center available to students as they complete high school. WIOA partners will promote the availability of youth training resources to the local school system. The Board will work closely with the Perkins postsecondary partner, to assure sequencing of courses from secondary to postsecondary and to ensure that participants achieve both a credential and job placement.

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

The American Job Center in Frederick is located on a public transportation route. Assistance with bus passes and, in certain instances, other methods of transportation are provided when deemed necessary for eligible adults to access training or employment opportunities. Information on supportive services, including partner resources, is readily available through the American Job Center. WIOA partners will have increased collaboration and access to information to connect and refer customers to supports needed to secure viable employment.

In accordance with the Workforce Innovation and Opportunity Act (WIOA) of 2014, supportive services are authorized for dislocated workers, adults and youth. Supportive services are defined as services that are necessary to enable an individual to participate in career and training services authorized under WIOA. In the context of a coordinated services, Workforce Services and WIOA staff will ensure funds are spent to maximize participants' opportunities and will take into consideration all of the available supportive services resources that are available to support an individual.

In the event assistance cannot be provided through other means, staff will assess and document in the MWE notes/case management activities the need for supportive services funded by WIOA. Supportive services requests must be reasonable in nature and only requested if staff, in collaboration with the participant, establish a demonstrated need and if the support will help the participant move toward self-sufficiency.

Supportive services may be provided to customers who are: participating in career or training services; unable to obtain supportive services through other programs providing such services; and are necessary to enable customers to participate in career or training services.

Provision of supportive services is subject to WIOA and FCWS funding availability. Individuals eligible for supportive services may be approved for a maximum amount of \$1500 and not exceed 6 months in duration for adults and dislocated workers and youth. Exceptions to these limits may be made with appropriate justification and leadership approval.

Examples of supportive services may include (but are not limited to):

- Transportation (bus passes, car registration for those eligible for Second Chances Garage assistance);
- Childcare and/or dependent care;
- > Job or training related business uniform attire, tools or related equipment;
- Housing resources;
- Mental health counseling and support;
- Academic fees;
- Clothing for interviews;
- Technology including internet service, tablets or other tools which enable individuals to participate in activities authorized under WIOA sec.134(c)(2) and (3).
- > Linkages to community services; or
- Needs-related payments that if applied, enable an individual to participate in career and training services.

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

Employment and training activities under Title I include training and career services. The WIOA Title I program staff will follow local policies and protocols for serving WIOA eligible and suitable adults and dislocated workers. Registration in the MWE is essential for tracking customers who may only be seeking career services, either self-service or staff assisted, and to initiate the data collection necessary to enroll customers who request training services. Therefore, an important first step in accessing services is for customers to complete their MWE enrollment.

The Board and WIOA partners have adopted a customer-centered approach to services delivery and will continue to refine this approach as partnerships and collaboration increase. Title I Adult and Dislocated Worker funding will be used to provide career services and training services. Career services cover a broad range of activities, including initial and comprehensive assessment of skills, labor market information, career pathway and progression information, job search assistance, development of an individual employment plan, career counseling, and other services. Training services include occupational skills training, on-the-job training, transitional jobs, and adult education and literacy provided concurrently or in combination with other training services. Funds may also be used to provide supportive services to assist individuals participating in career and training services. Participants are determined to be eligible for Dislocated Worker funding during the Registrar and enrollment process.

For WIOA Title I Adult Program employment and training services, FCWS will provide priority of service to individuals in the target populations, in accordance with WIOA and State issued policy.

FCWS offers career and intensive level services to Adult and Dislocated Worker customers, and includes: Career services include, but are not limited to;

- Career resource center, access to labor market information, job search information and assistance, and training provider information.
- Orientation, intake, eligibility determination, skill assessment, job search and referral to employers.

Intensive one-on-one services include, but are not limited:

• Comprehensive assessment, counseling, case management (including follow up services), training, and pre-employment support and/or supportive services necessary to participate in employment and training activities.

In addition to established priority groups, Adult and Dislocated Worker programming will focus on additional barriered populations which may include, but are not limited to:

- 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
- Long-term unemployed individuals
- Native Americans, Alaskan Natives, and Native Hawaiians
- Older individuals
- Single parents (including single pregnant women and non-custodial parents)
- Veterans
- Youth who are in, or have aged out of, the foster care system

#### **Veterans Priority**

The term "veterans' priority of service" is defined, regarding any qualified job training program, as a policy whereby an eligible veteran (or spouse of an eligible veteran) shall be given priority over any eligible nonveteran for the receipt of employment, training, and placement resources and services provided under that program, notwithstanding any other provision of law. When a customer visits the American Job Center for the first time, the receptionist inquires as to the customer's veteran's status. If he/she identifies as a veteran, he/she is provided with a referral card to take to the resource room which lets staff know the veteran's status.

Such priority includes giving access to such services, to a veteran (or spouse of an eligible veteran) before a non-veteran if resources are limited. During the registration process (in the MWE), the training candidate will be asked if he/she is a veteran (or spouse of an eligible veteran). If self-disclosed as yes, the candidate will be asked to verify his or her veteran status within the MWE system.

Customers who identify themselves as interested in individualized and/or training services will be invited to work with staff to determine eligibility and priority of service based on the local Board's policy. Customers will then work with staff to develop an individual employment/career plan that includes a plan to address career pathways and self-sufficiency.

#### Training

Customers who pursue training as an option to meet employment and career goals will be invited to complete a training request application that shall provide labor market justification demonstrating the need for training. The Board seeks to align training with in-demand occupations and careers that lead to self-sufficiency.

Additional training related activities may include, but are not limited to:

- Work-based learning opportunities,
- Paid work experiences for eligible customers,
- On the Job Training

- Pre-apprenticeship and apprenticeship opportunities,
- Transitional employment opportunities.

FCWS meets regularly with partner organizations and community hubs to inform external agencies about current program-funded services. When appropriate, FCWS conducts offsite or virtual informational and intake sessions to heighten awareness about career services and to help customer's access services available under WIOA.

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

Dislocated worker funding is used locally to provide individualized career services including case management, assessment, skills upgrade, and training for eligible participants. Dislocated Workers may be identified during a lay-off event, referred from RESEA/ROW or may come to the AJC for any number of classes or services independently. Once identified, Dislocated Worker participants follow an identical process for service integration and access to services mirrors that of Adult participants. Dislocated Worker funding is also used as the primary funding source for the local Incumbent Worker program, Frederick Business Works.

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

Provided that participants meet all other requirements, those seeking training services will be evaluated for suitability to receive training services including evaluation of their level of Self-Sufficiency.

Participants whose family income for the previous 6 months is at or under the 250% Lower Living Standard Income Level (LLSIL), are invited to move to the next step of the process to request training funds.

The 250% threshold falls between the 2018 ALICE Survival budget for Frederick County, MD, which includes costs of necessities (housing, childcare, food, transportation, and health care, plus taxes and a 10 percent contingency and the 2018 ALICE Stability budget, which also includes savings and technology categories, e.g., cable and Internet. This approach will allow for a balance of serving a variety of customers and focusing on serving individuals and families in the community with lower incomes and barriers.

The 250% LLISL is in effect beginning July 1, 2021 and may be adjusted if needed to reflect a change in economic conditions.

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

Dislocated Workers must meet general, state and federal eligibility criteria to receive employment and training services under the WIOA Dislocated Workers program. Definition – An individual is determined unlikely to return to previous industry or occupation when at least one of the following criteria is present as established by the local Board:

• Labor Market data indicates that an industry/occupation is not in-demand in the area.

- The individual has developed limitations/barriers to returning to a specific industry or occupation without assistance.
- Education Level Highest education level completed is a high school diploma or lower
- Job Tenure Worker was employed in previous occupation for 10 years or greater without skills upgrade.
- Declining Industry Worker's previous industry within our workforce region is experiencing a negative growth rate
- Low Demand Occupation Worker's previous occupation within our workforce region is experiencing a negative growth rate
- High Unemployment Rate Based on the worker's community of residence, local area as a whole, and/or within a specific occupation.
- Other circumstances may be considered and approved through team consensus.
- (J) A description of how the Local Board will interpret and document eligibility criteria for in-school youth "requires additional assistance to complete an educational program or to secure or hold employment" as set forth in the State's Youth Policy and WIOA Sections 129(a)(1)(B)(iii)(VII) and (a)(1)(C)(iv)(VII). DWDAL's policy on the Title I Youth Program can be found here: <a href="http://www.labor.maryland.gov/employment/mpi/mpi8-15.pdf">http://www.labor.maryland.gov/employment/mpi/mpi8-15.pdf</a>.

The Workforce Development Board and FCWS define in-school youth who "require additional assistance to complete an educational program or to secure or hold employment" as low income, in-school youth with one or more of the following characteristics:

- Are youth deemed at risk of dropping out of school by a school official; or
- Are youth in danger of not graduating from high school without having to take additional coursework and/or summer school; or
- Are youth with court agency/referrals mandating school attendance; or
- Are youth who do not have parental support or adult mentoring in the home, at school and/or in other critical areas of the student's life.
- ➤ The Board and FCWS define out-of-school youth who "require additional assistance to complete an educational program or to secure or hold employment" as low income, out-of-school youth with one or more of the following characteristics:
- Are youth who does not have parental support or adult mentoring in the home, at school and/or in other critical areas of the youths' life; or
- Are youth 18 years of age or older and unable to complete FAFSA paperwork due to being estranged from their parent/guardian; or
- Are youth with a poor work history, to include no work history, or have been fired from a job within the last 6 months prior to application; or have never held a full-time job for more than 13 consecutive weeks; or
- Are youth with an incarcerated parent or guardian; or
- > Are youth facing significant cultural challenges within the family or community

The documentation to substantiate the eligibility criteria "requires additional assistance to complete an education program or to secure or hold employment" 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.

A description of how the Local Board will interpret and document eligibility criteria for out of school youth "requires additional assistance to complete an educational program or to secure or hold employment" as set forth in the State's Youth Policy and WIOA Sections 129(a)(1)(B)(iii)(VII) and (a)(1)(C)(iv)(VII). DWDAL's policy on the Title I Youth Program can be found here: http://www.labor.maryland.gov/employment/mpi/mpi8-15.pdf.

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

Training services may be made available to employed and unemployed adults and dislocated workers who after eligibility determination and assessment, have been determined as unlikely or unable to obtain or retain self-sufficient employment. This may be due to a variety of life circumstances including, dislocation, poor work history, change in health status, and change in family or housing status or a lacking of skill and/or credentials needed to obtain/retain employment. All of these issues can significantly hamper an individual's ability to compete in the job marketplace. Any of these challenges can be determined through and interview, evaluation, assessment or career planning engagement and must be documented in the electronic and programmatic case file accordingly. Appropriate documentation will be collected in accordance with relevant program guidance and procedures.

In addition to general eligibility documentation, when being considered for training, the customer must complete a training application which includes researching local labor market information, job opportunities, training vendors, wage potential, and supplementary funding sources such as Pell Grants, scholarships, etc. If a customer is requesting training in a new industry, s/he will also be expected to provide justification that a career change is necessary and complete an informational interview with an individual currently employed in the occupation/industry to which the customer aspires. The customer will also be encouraged to meet with the training provider to research whether or not the customer meets the training provider's requirements including but not limited to, academic placement tests or other prerequisites to ensure that the customer has the skills and qualifications to successfully participate in the training.

- (L) A description of how the Local Board will provide access to the 14 required program elements for the WIOA Youth program design, including whether the Local Board has contracted with youth service providers or not:
- Tutoring, skills training, and dropout prevention;
- Alternative secondary school services;
- Paid and unpaid work experiences;
- Occupational skills training;
- Leadership development opportunities;
- Supportive services;
- Mentoring;
- Follow-up services;
- Counseling;
- Concurrent education and workforce preparation activities;

- > Financial literacy education;
- > Entrepreneurial skills training;
- ➤ Labor Market Information (LMI); and
- > Preparing for Post-Secondary Education and training.

The local Board will provide the 14 required program elements through a combination of contracted services, Title I funded staff delivery of services, partner referrals and community partner collaborations, as follows:

PROGRAM ELEMENT	PROVIDER/S
Tutoring, skills training, and dropout prevention	Contractor, Title I funded staff, volunteers, training providers
Alternative secondary school services	Contractor, Title II partner
Paid and Unpaid Work Experiences	Contractor, Title I funded staff
Occupation skills training	Training providers
Leadership Development Opportunities	Contractor, Title I funded staff, American Job Center partners, community partners
Supportive Services	Contractor, American Job Center partners, Title I funds
Mentoring	Contractor, Title I funded staff, Workforce Development Board, community partners, volunteers
Follow-up Services	Contractor, Title I funded staff
Comprehensive Guidance and Counseling	Contractor, Title I funded staff, community partners
Concurrent Education and Workforce Prep Activities	Contractor, Title I funded staff, community partners
Financial Literacy Education	Contractor, Title I funded staff, community partners
Entrepreneurial Skills Training	Community Partners, volunteers, Workforce Development Board
Labor Market Info	American Job Center Partners, contractor, Title I funded staff, community partners
Preparation for and transition to Post- Secondary Education and Training	Contractor, Title I funded staff

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

The Board understands the importance of work-based learning as an evidence based strategy for increasing the employability and career development of youth. When procuring youth services, there is a requirement in Frederick County Government's RFP application process for procurement and contracting with youth providers that a minimum of 27% of the award amount be allocated to work-based training activities to ensure that the WIOA 20% requirement is exceeded, or at least met. Work-based training activities can include, but are not limited to internships and job shadowing, summer employment opportunities, pre-apprenticeship programs, on-the-job training, and instruction in employability skills. Proposals will be evaluated in two phases; first based on technical and budget submittals; second, if deemed necessary, on oral discussions. The Fiscal Manager and Youth Program Manager are part of the review team and the budget and budget narrative are part of the evaluation criteria. Fiscal staff and Youth Program Manager review expenditures on a quarterly basis via desk reviews to ensure that at least 20% of Youth Funds are for work-based learning activities.

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

In order to prioritize serving out-of-school youth, outreach strategies are focused on disconnected youth who are high school drop-outs, not meaningfully connected to employment or postsecondary education, justice connected, pregnant and/or parenting, youth with disabilities, and homeless or foster youth, or youth who have aged out of the foster system. FCWS leverages strong relationships with partner agencies and local youth focused organizations to collaborate in serving local youth with barriers to employment through WIOA program services. A strong partner network that fosters referrals and provides program information to youth consumers provides a good source of potential enrollees.

The Local Area intends to increase the number of in-school-youth, using up to 50% of funds on this population based on the waiver received from the U.S. Department of Labor. <sup>18</sup> The local area has limited resources for serving in-school-youth who are at are at risk of dropping out of school. Taking advantage of this flexibility will allow the local area to provide workforce development services to this population, including critically needed dropout prevention services. In-school-youth efforts will also prioritize Youth Apprenticeship, co-enrollment with the Division of Rehabilitation Services. FCWS has strong relationships with Frederick County Public Schools (FCPS) which will aid in the prioritization of Youth Apprenticeship connections and enrollments. FCWS will also leverage FCPS relationships to identify youth at risk of dropping out who would benefit from WIOA services.

<sup>&</sup>lt;sup>18</sup> Note: The U.S. Department of Labor (USDOL) has approved Maryland's request to waive the obligation outlined in WIOA Section 129(a)(4) and 20 CFR 681.410 that not less than 75 percent of funds allotted under Section 127(b)(1)(c), reserved under Section 128(a), and available for statewide activities under subsection (b), and not less than 75 percent of funds available to Local Workforce Development Areas (Local Areas) under subsection (c), shall be used to provide youth workforce investment activities for out-of-school youth. Under this waiver, both the required State and local percentage for Out-of-School Youth (OSY) expenditures has been lowered to at least 50 percent. This waiver is effective July 1, 2019 through June 30, 2022.

FCWS has a history of strong partnership with DORS in providing services to youth receiving Pre-Employment Transition Services (Pre-ETS) from DORS. That relationship will be leveraged to increase WIOA enrollment of youth with disabilities, enhancing the services FCWS already provides to that population with non-WIOA funding.

The FCWS Youth Manager and Fiscal Manager will continue to work in close collaboration to ensure that inschool-youth expenses do not exceed 50% of WIOA youth funds.

(O) A description of how the Local Board will provide basic and individualized career services to customers. The description should explain how individualized career services will be coordinated across program/partners in the AJCs, including Vocational Rehabilitation, Temporary Assistance for Needy Families (TANF), Community Action Agencies, and Adult Education and Literacy activities. This description should specify how the Local Area will coordinate with these programs to prevent duplication and improve services to customers.

#### **Basic Services**

Basic services are provided by Workforce Services staff and other WIOA partners. At the time of this writing, all basic services are provided remotely/virtually. As restrictions and the state of emergency end, the Workforce Services will re-assess the delivery of in-person basic services. During normal business hours customers can access computers, printers and faxes for job search related use.

First time visitors are triaged for appropriate initial steps and are offered information that encompasses and overview of services offered in the center. Depending on available staff levels, access to the resource room may be limited and/or self-service.

Services are intended to be agile and adjustments to the type of services and the mode of delivery are made as our customer markets demonstrate needs.

#### American Job Center Services Offered

- Access to assessment tools to identify skills, interests and aptitudes Formal and informal assessment tools may be used
- Resource library
- Administrative supplies (paper, envelopes, pens, etc.)
- Access to job postings and related announcements (both web-based and hard-copy)
- Resume review and practice interviews available.
- Information about accessing services offered from other WIOA System partners
- Eligibility determination for Individualized Services (including training)
- Referrals and community/partner support information
- Supportive Services depending on need and availability
- Web-based resources include email notifications about jobs, events, classes and resource information, social media outlets for information sharing
- Job and Career Related Classes
- Basic Skill Development

#### Individualized Services

Individualized Services are available to adults, dislocated workers, and youth after eligibility determination (and in line with priority of service policies) in order to provide intensive one-one assistance in obtaining or retaining employment. Individuals are paired with an Employment and Training Specialist or a Youth Program Specialist who coordinate services consistent with WIOA requirements. Services may be provided as individual and/or group counseling/mentoring/instruction.

In-depth and staff assisted assessments are conducted through informal one-one interviews, diagnostic tests and/or other means to identify existing skills, interests, aptitudes, values, potential barriers to employment, employment suitability and career planning activities.

An initial step when entering Individualized services is development of an Individual Employment Plan (IEP) or Individualized Service Strategy (ISS) for youth, to identify customized employment goals and achievement objectives. Coaching and planning around labor market information and industry demand is integrated to ensure an appropriate employment goal. IEP and ISS development is conducted jointly between the individual and an Employment and Training Specialist or Youth Program Specialist and is reviewed and updated regularly.

Individualized Services may include:

- Short-term prevocational services such as workplace preparation activities, development of learning skills, communication skills, resume and interview preparation, time management, and assistance with effective job search navigation.
- Work based learning opportunities linked to career paths. Transitional Jobs are structured experience based learning opportunities designed to equip the individual with the skills necessary to obtain and retain employment in their career pathway. Work experience is offered for a limited/pre-determined time in a structured work setting.
- Assistance with barrier removal to obtain and retain employment as appropriate with assistance from partner organizations, supportive services, and community referrals.
- Other innovative strategies deemed to be of value in assisting the individual with employment, career progression, or that support the individual in attaining selfsufficiency.

#### Coordination with WIOA Partners

Wherever possible, WIOA partner organizations will identify appropriate referrals and provide adequate information about intake, referral, and services offered to reduce duplication, maintain client confidentiality, and promote the individuals progress towards career growth, financial independence, and self-sustainability. Partner organizations may be co-located with the one-stop to further promote collaboration. Once the selection of the one-stop operator occurs, the operator will work to increase the collaboration and coordination of services offered by multiple providers in the AJC and local workforce system.

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

To support the goal of job retention, wage gains, and career progression for adult participants who obtain unsubsidized employment, follow-up services are provided for at least 12 months as appropriate. Following the first date of employment, outreach to the participant will be conducted on a quarterly basis. Contact can include counseling about the workplace, identification of challenges, or additional services toward job retention and/or advancement.

After youth participants have completed the program, applicable follow-up services are made available for at least 12 months to ensure the long-term success of the participants. At a minimum outreach to the participant will occur on a quarterly basis. Follow-up services for Youth may include counseling about the workplace, assistance in securing a better paying job, career development, referrals to community resources or other supportive services.

Documentation describing the follow-up services and including the ending of follow-up services will be maintained in the MWE case file for each participant.

Section 6 – Title II – Adult Education and Family Literacy Functions This Section should include –

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

#### Coordination of Workforce Development Activities

In line with the development of the WIOA MOU, the Board intends to ensure coordination of workforce development services with the local Adult Basic Education and Literacy partner(s) and other partners in the system. Partners agree to build an efficient workforce system through sharing of information, increased collaboration, staff training and streamlining service delivery to maximize partner strengths and improve customer flow and access. As the partnerships continue to move towards stronger alignment, there will be greater emphasis on creating an easy navigation process and reduced duplication for a customer centered experience.

As the MOU is developed, key stakeholders throughout the workforce system met to establish priorities, goals, and strategies, as previously described. The planning process continues as partners work to streamline entry points, common intake, standardized assessment, effective and timely information sharing, and determine which workforce needs must be developed system-wide to best prepare jobseekers to compete effectively in our future economy.

Through direct delivery, referral, or coordination services are intended to support basic literacy and financial skills, focused on life skills reading and math. Many students have a goal of earning high school diploma, some students need to improve basic literacy skills for the workforce or to enter a career/training program.

**Adult Basic Ed/Adult Secondary Ed/Title II** (at the American Job Center and/or via referral to a partner organization)

- Comprehensive Intake and Assessment process that includes program overview, diploma options in the state of Maryland, individual interviews to gather more information about school history, work history, work goals, future educational goals, etc, goal setting, writing sample and skills assessment in math and reading. For students who qualify, the GED® Ready (half version of the GED® exam) is offered free of charge.
- Adult Basic Education Classes: intended to support basic literacy and financial skills, focused on life skills reading and math, many students have a goal of earning high school diploma, some students need to improve basic literacy skills for the workforce or to enter a career/training program.
- Pre-Diploma Classes: intended to support students preparing to take the GED® exam or enter the NEDP program. Provides basic skills review and introduces algebra, writing essays, reading for information, etc.
- GED® Preparation Classes: Classes focused on specific subject areas (math/science or social studies/language arts) to prepare students to take and pass those subject areas of the GED® exam. Students taking and passing the GED® exam are awarded a Maryland State High School Diploma.
- National External Diploma Program: FCC offers the NEDP to students qualifying on math, reading and writing assessments.

#### Planning for Career Pathways

A major focus of our robust partnerships is aligning regional talent resources with high-growth economic clusters, resulting in a stronger, more agile workforce, increasing the ability to retain, grow, and attract business to the area and to help identify and create workforce development strategies to compete in the local, regional, and global economy. Using a career pathways model to develop a skilled workforce that both meets the needs of employers and creates economic self- reliance for our constituents, the local Board will coordinate with the Adult Education provider and other partners to identify industry sectors and occupations that offer career pathways with accessible entry points for low skilled workers, and workers at all levels and identifies employers with that can provide input to mapping for entry level occupations and stackable credentials for progression.

#### Board Review of Adult Education and Literacy Provider Applications

The Maryland Department of Labor will competitively select adult education and literacy providers. The local Board chair will review applications submitted by adult education applicants to assess alignment with the local area's plan and provide documentation/recommendations. The process will adhere to guidance that is provided by the Maryland Department of Labor regarding the process at the time of the RFP for Title II funds is released.

(B) A description of how the Local Board will coordinate efforts with Title II providers to align basic skills and English language assessments. The description should include:

- An outline of the agreed upon steps that will be taken to align basic education skills and English language
  assessments within the Local Area, including, but not limited to, any MOU entered into by the workforce
  development and adult learning partners;
- An identification of how assessment scores will be shared among WIOA Title I areas and Title II providers (Consideration must be given to the Federal Education Rights and Privacy Act (FERPA));
- An identification of who will conduct which of the approved assessments (including for Trade Participants) and when such assessments will be conducted, consistent with this policy;
- An outline of how the Local Area will coordinate testing between workforce development and adult education providers; and
- An outline of how the Local Area will ensure that test administrators are to be trained in accordance with MD Labor's policy and applicable testing guidelines as set forth by the applicable test publisher.

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

To align partners in the local workforce development system, key stakeholders met to establish priorities and strategies, streamline entry points, intake, assessment and plan for timely information sharing. The Maryland Department of Labor requires that Title I local areas (including Youth and Trade participants) and Title II Adult Education providers work together to provide NRS-approved assessments for Adult Basic Education learners and English Language Learners.

To measure academic function, both FCWS and the local Adult Education provider will use CASAS assessment system and ensure that only qualified staff are administering assessments. Any new administrators will complete the training requirements outlined by CASAS to ensure proper testing protocols are fulfilled and to protect the validity of the assessment.

FCWS and Adult Education will coordinate to offer assessment regularly and at multiple locations (including FCWS and FCC/Adult Ed) to ensure maximum testing access for program delivery. Adult Education and FCWS staff will facilitate test delivery (with consideration to availability of qualified staff).

Assessment results will be shared when referring a participant between the two providers to eliminate overtesting, ensure appropriate plan development, and identify potential barriers and needs towards the employment goal. To ensure confidentiality, an approved release of information and will be used for information sharing between the partners and participant information will be kept secure. MWE may also be used as one possible way to share test scores and results from FCWS to Adult Education. Assessment results will remain valid between partners according to requirements detailed in MPI 2018-02 and testing guidelines provided by CASAS.

at least 40 hours of instruction, per

CASAS requirements

# CASAS Assessment to Determine educational functioning **FCWS** • Pre-test to determine academic Youth participants at intake functioning level Trade participants WA/WD participants without post-secondary degree • Post-test (when appropriate) used to determine educational attainment that are seeking training or as determined by after instruction (per testing system informal assessment. requirements) when used to demonstrate MSG Frederick Community College Adult Education Program • Pre-Test to determine educational All participants attending intake provided they are 18 functioning level and class placement years of age or older Post-Test to determine educational gains and next academic steps, after

FCWS in coordination with Adult Education provider(s) will assist in the development of information sharing tools and a process that ensures customers are not over-assessed. There will be continued discussion and strategizing to develop a comprehensive intake and assessment process that includes program overview, individual interviews to gather more information about education and employment history and goals, goal setting, listening, speaking, reading and writing skills assessment.

In order to measure student academic performance, Frederick Community College's Adult Education program uses CASAS Assessment System via eTests Online or paper booklets, as approved by the NRS. Depending on the student's area of need, the following assessments may be administered:

Assessment	Appraisal Used	Level and Forms
CASAS Life and Work Series:	Form 80R	Level A—81, 82
Reading		Level AX—81X, 82X
		Level B—83, 84
		Level C—185, 186, 85, 86
		Level D—187, 188
CASAS Life Skills Series: Math	Form 30	Level A—31M, 32M
		Level B—33M, 34M
		Level C—35M, 36M
		Level D—37M, 38M

CASAS Life and Work Series:	Form 80L	Level A—981L, 982L
Listening		Level B—983L, 984L
		Level C—985L, 986L

Students take the appraisal and pre-test at initial intake to identify academic need and to determine class placement. After completing a minimum of 40 hours of instructional hours, students take a corresponding post-test to demonstrate growth and determine the next level of placement. If a student stops attending class and returns after a period of 4 months or more, the student is given a new pre-test (progress testing) to determine the best placement after the lapse of instruction.

All staff members administering assessments complete the training requirements outlined by CASAS to ensure proper testing protocols are followed and to protect the validity of the assessments. The training modules are located at <a href="http://training.casas.org/">http://training.casas.org/</a>. New instructors receive an assessment orientation to develop an understanding of the assessments, competencies, and educational functioning levels.

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

The Executive Director for Adult Education and Lifelong Learning for Frederick Community College sits on the Board. Frederick Community College is the only Title II provider in Frederick County. The Executive Director is actively involved with the other WIOA partners and there are frequent opportunities to partner, collaborate and communicate.

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

AJC staff make referrals to the Adult Education program. Title II staff from the community college are present frequently in the AJC and there are plans for adult education programming and classes to take place at the AJC. Workforce Services employs a staff person dedicated to making the connection between the adult education program and WIOA Title I services. The position focuses on working directly with Title II participants and staff.

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

The IELCE program is designed to offer English language learners a foundational understanding of Frederick County's in-demand industries and career pathway opportunities within those industries. The adult education provider offers IELCE courses that incorporate workplace preparation skills, contextualized English language development, career exploration, and civic and community participation to help students identify and prepare for a career pathway of interest in one of those in-demand industries. The Adult Education and ESL Transition Specialist provides case management and transition support for IELCE students to enroll in Integrated Education

and Training opportunities where English language development continues to be supported in a contextualized setting. The Transition Specialist also assists students with identifying training funding opportunities through financial aid, scholarships, employer connections, and referrals to county agencies.

Depending on the specific occupational training, ESL teachers may co-teach with the training provider or offer supplemental support classes before or after class to strengthen understanding of the material and support any language needs. Students in the IELCE program have access to open lab support throughout their courses to provide any additional academic, occupational, or language support throughout the training. Student interest and local employer needs drive the focus of Integrated Education and Training opportunities, and employers are key partners in developing curriculum, participating in class visits, and holding mock interviews at the end of programs to identify potential candidates of interest for future positions. Frederick Community College collaborates with the adult education program to identify scholarship and grant opportunities available to support cohorts of English language learners in the IELCE program to complete IET programs that are offered in partnership with the institution. The IELCE program is considered in the development and planning process as one of the entry points for new career pathways, apprenticeships, and workforce development programming.

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

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Section 7 – Title III – Wagner-Peyser Functions This Section should include –

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

The Frederick County Workforce Development Board, through the one-stop operator, will coordinate the career services delivered by Wagner-Peyser staff with the career services delivered by other Frederick County American Job Center partners through the Memorandum of Understanding and Resource Sharing Agreement.

Labor Exchange services fall under the Basic Career Services mentioned in Section 4 of Training and Employment Guidance Letter 03-15 (TEGL 03-15). Wagner-Peyser staff also may make available the Individualized Career Services discussed in TEGL 03-15, particularly for those individuals with barriers to employment as defined in WIOA sec. 3(24). Most Basic Career services are provided by Frederick County Workforce Services staff.

Wagner-Peyser staff are cross-trained to screen customers for WIOA eligibility and make appropriate referrals to core partners and community-based organizations including Goodwill, Transit, and Frederick County Mental Health Association, and others for supportive services. Staff make referrals to resources including the 24-Hour call center through Maryland 211 and the Frederick County Guide to Mental Health and Community Support Services.

Wagner-Peyser management staff participate on the Board. Wagner-Peyser staff participate in WIOA partners in service training, board meetings and customer flow-process improvement sessions. Title I and III management teams meet regularly to review processes in the AJC, seeking opportunities to collaborate on service delivery to insure a strong return of investment for grant programs.

The Board assures that every effort will be made to reduce duplication of services and maximize coordination among partners.

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

Few Migrant Seasonal Farm Workers (MFSW) are available in Frederick County. The Foreign labor program (H2A guest worker) is used by many of the farms in the area. Outreach programs are conducted during the primary preparation and growing seasons to seek out MFSW. Visits to farms are coordinated to provide assistance to farmers and identify opportunities to assist farm workers. Communication with farm workers is facilitated through Language Line if the workers require that service.

Wagner-Peyser staff will verify monthly all jobseekers that enroll as Migrant Seasonal Farm Workers inthe

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

Outreach Workers will be required to locate and contact MSFWs who are not being reached by the normal intake activities of the local Workforce Center to enhance the employability of MSFWs and provide supportive services.

The goals of the Outreach Program are to:

- Provide basic services where MSFWs work, live, or gather for recreational purpose;
- Inform MSFWs of the full array of services available at the Workforce Center; and
- Provide needed supportive services and referral to other service providers.
- Conduct random, unannounced field checks to agricultural worksites where MSFWs have been placed through the intrastate (MWE) and interstate recruitment system.

The outreach worker ensures conditions are as stated on the job order and that the employer is not violating an employment-related law. The outreach worker will also document and refer information to the RPD for processing if they see or learn of a suspected violation of Federal or State employment-related laws and will conduct Pre-Occupancy Housing Inspections

Should MD Labor recruit and/or refer MSFWs to an agricultural employer (either intrastate or interstate) the MD Labor MSFW Outreach Worker will complete a housing inspection using ETA FORM 338 if an H2A inspection has not previously been conducted. Per Policy Issuance 2018-01, MD Labor will conduct one housing inspection, per season and per employer, for agricultural workers who were recruited by MD Labor. If the employer also hires a H2-A worker, and a housing inspection was already completed, the housing inspection requirement will be considered met unless violations are identified. If violation is identified, staff may need to return to re-inspect the site.

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

The MD Labor Reemployment Program Director will determine who is responsible for documenting migrant and seasonal farmworker housing inspections. Right now, there are no MSFW registered in the county. Foreign Labor Certification staff conduct H2A inspections and may inspect housing in the local area as necessary.

Section 8 – Title IV – Vocational Rehabilitation Functions (Michelle with DORS/Sharon Plump) This Section should include –

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

There are no replicated cooperative agreements in place between the Board, the MD Labor and the Maryland Division of Rehabilitation Services with respect to efforts to enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use of and sharing of information, cooperative efforts with employers and other efforts of cooperation, collaboration and coordination.

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

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

(B) A description of how individuals with disabilities will be served through the AJC system in the Local Area. 19

All customers and employers will be served seamlessly in the American Job Centers. WIOA partners collaborate with the Maryland Division of Rehabilitation Services (DORS) to negotiate the DORS role in Frederick's workforce system. Specific expectations and roles are spelled out in the Memoranda of Understanding and Resource Sharing Agreement. There are regular meetings and discussions among AJC partners focused on efforts to enhance the provision of services to individuals with disabilities, ensure staff have opportunities for training and technical assistance, determinations regarding the use of and sharing of information, and coordinated and collaborative efforts to include employer input and participation.

Individuals with disabilities will continue to receive services through the American Job Center and have access to all services offered. Customers with disabilities that meet DORS criteria will be referred to DORS for technical VR expertise and to receive services beyond those available through the AJC or other partners.

As with all individuals who access the American Job Centers, whether they have a disability or not, the goal is to have an effective referral mechanism, which will enable individuals to select the services they feel they need.

In addition, the goal is to ensure that all information and services are provided are accessible, regardless of the individual's disability. DORS will provide training to the partners in such areas as: programmatic and physical accessibility, serving individuals with disabilities that require support services, disability etiquette and sensitivity training, assistive technology.

Section 9 – Temporary Assistance for Needy Families Functions

With guidance and technical assistance from DHS and MD Labor, Local Areas will use a functional approach to integration which may include revised practices and policies related to:

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

Data snapshots on the TANF population, statewide and by county, is available on the MD Labor website at: <a href="http://www.labor.maryland.gov/employment/wioatca.shtml">http://www.labor.maryland.gov/employment/wioatca.shtml</a>.

This Section should include -

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

<sup>&</sup>lt;sup>19</sup> MD Labor's Nondiscrimination Plan can be found here: <a href="http://www.labor.maryland.gov/employment/ndp/">http://www.labor.maryland.gov/employment/ndp/</a>.

The Frederick TANF/TCA partners have established a series of protocols and have a robust informal and formal referral process in place. Since August, 2017 TCA/TANF staff have been co-located with other partners in the AJC. The One-Stop Operator facilitates regular meetings and strategy sessions to ensure coordinated service delivery. Title I and TCA/TANF case workers regularly communicate and share progress with customers as appropriate.

Further progress meetings will identify opportunities for more collaboration in:

- o Common intake and referral
- o Co-case management and communication strategies
- Outreach and connections to supportive services
- o Data sharing and customer confidentiality
- o Opportunities for co-location
- Opportunities to connect businesses with untapped talent
- o AJC staff training opportunities
- (B) A description of the implementation and coordination process to enhance the provision of services to individuals on TANF that includes:
  - Potential co-location of LDSS and/or WIOA Partners at AJCs or LDSS depending on the nature of local partnerships and operations;
  - Leverage existing financial and in-kind contributions to the WIOA system to ensure coordination of services provided by multiple programs, creating a seamless approach to delivering services;
  - Cross train and provide technical assistance to all WIOA Partners about TANF;
  - Ensure that activities are countable and tracked for the TANF Work Participation Rate;
  - 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
  - Contribute and provide outcomes data to the WIOA system through strategies for collecting and reporting varied program reporting requirements.

Discussions have occurred and will be ongoing regarding:

- TCA/TANF case worker has office space and regular hours at the AJC (during normal business hours and when open to customers).
- Contributions to the AJC and cross agency collaboration are coordinated by the one-stop operator.
- Professional development activities and cross-training is coordinated among partners by the one-stop operator.
- Ensure that activities are countable and tracked for the TANF Work Participation Rate (WPR).
- Access to business services and employer initiatives to attract and better serve employers by
  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.

- Contribute and provide baseline outcomes data to the WIOA system through strategies for collecting and reporting varied program reporting requirements.
- (C) A description of the LDSS representation on the Local Board to ensure that TANF expectations, roles, and responsibilities are addressed in the Local Area.

The Assistant Director for Family Investment programs sits on the Board and is actively engaged in WIOA partner discussions. There is a dedicated TANF staff person located in the AJC who serves customers and makes seamless referrals to other AJC services and programs. There are ongoing discussions among all WIOA partners to coordinate assessment information and case management information.

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

Efforts are underway to bridge connections between programs and create a comprehensive customer experience. The Local Board has made online skills and training available to all TANF recipients via the Metrix Learning platform – SkillUp Frederick County. Courses cover life management, occupational skills development, career pathway planning, and access to skills assessments. Referrals to WIOA staff for training and skills development happen on a regular basis. The referrals come via email, phone and WIOA Title I staff stay in regular contact with the TANF/TCA staff to enhance the wrap-around services and help the customers access all supports needed to be successful in training and employment. Co-case management/co-enrollment strategies and leveraging program partners' resources remain a strong focus for the local area. Due to COVID-19 restrictions, it has put a pause on progress in this area however, 2021-2022 will likely present more opportunities to advance these strategies.

# Section 10 prompt has added and updated effective April, 2023:

Section 10 – Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)

This section should include -

A) How many SNAP work registrants currently exist in the jurisdiction? *Note: Local Areas should work with their Local Department of Social Services for assistance in accessing this information.* 

SNAP is a means-tested program designed to reach all low-income individuals and families regardless of household composition. Unlike some other safety net programs, SNAP can serve households with and without dependents. Consequently, most SNAP recipients—both nationally and in Maryland—are adults. According to the local Department of Social Services, there are currently 1,642 SNAP work registrants in our jurisdiction.

B) Describe the process the local WIOA partners utilize, or plan to utilize, to support SNAP work registrants in accessing available supports and workforce development programs.

Partners meet regularly to discuss existing, updated, and upcoming programs and services to identify ways to partner to ensure individuals are receiving information about assistance. The local Department of Social Services staff refer SNAP work registrants to the AJC to access all programs related to employment and training. DSS has an in-house work program for SNAP E&T work registrants. The new Program Integrity Administrator is overseeing the SNAP E&T work

program and DSS will have 3 case managers concentrating on tracking, assessing, and referring this population for work program activities. The new Program Manager will start to attend the quarterly WIOA partner meetings and the SNAP E&T staff will be invited to join in the convenings. Like most partners in the local workforce system, DSS will use the UniteUs platform to make referrals to services as appropriate.

C) List the available SNAP E&T third party partners in your local jurisdiction 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. *Note: Local Areas should work with their Local Department of Social Services for assistance in accessing this information*.

The only third party partner listed in the statewide <u>E&T Partner Database</u> that serves Frederick County is the Jewish Council of Aging which only provides on-the-job training for people with low income age 50 and older who live in Montgomery and Frederick counties.

### Section 11 – Community Service Block Grant Functions

This Section should include –

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

Community Action Agency, City of Frederick is the CSBG provider in the local area. Through a wide array of programs and services, the Frederick Community Action Agency provides food, shelter, medical care, housing, and other forms of assistance to families and individuals that are low-income or homeless. Started in 1968, the Frederick Community Action Agency is sponsored by the City of Frederick and the Friends for Neighborhood Progress, Inc. The Frederick Community Action Agency is administered by a fifteen-member Board of Directors appointed by the Mayor and Board of Aldermen of the City of Frederick.

Although the Community Action Agency in Frederick does not operate an employment and training program, they are considered an important partner in the local workforce system. They provide a variety of supportive services, access to medical/health insurance programs, transportation assistance, and housing assistance to the most vulnerable in our community. Workforce and employment services staff make referrals to the Agency for assistance.

The services provided by the local Community Action Agency include:

- Outreach & Transportation Services
- Case Management Services
- Housing Counseling & Housing First
- Transitional Shelter & Homeless Services
- Weatherization & Housing Rehabilitation
- Primary Health Care Services
- Food & Nutrition Services
- Energy Assistance Services

- (B) A description of the implementation and coordination process to enhance the provision of services to individuals on CSBG that includes:
  - Potential co-location of CAAs and/or WIOA Partners at AJCs or CAAs depending on the nature of local partnerships and operations.
  - Leverage existing financial and in-kind contributions to the WIOA system to ensure coordination of services provided by multiple programs, creating a seamless approach to delivering services.
  - Cross train and provide technical assistance to all WIOA Partners about CSBG.
  - Ensure that activities are countable and tracked for CSBG performance metrics.
  - 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
  - Contribute and provide baseline outcomes data to the WIOA system through strategies for collecting and reporting varied program reporting requirements.

Currently, there is no plan to co-locate. However, AJC center staff often provide customized job search related programming at CAA's office for their participants. Similarly, CAA provides regular transportation for individuals who want to use the services located at the AJC. This will be accomplished using the MOU and RSA process. The one-stop operator will coordinate training for AJC staff to ensure they have the knowledge of CAA services and can make appropriate contacts and referrals.

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

The newly created Department of Housing and Human Services at the City of Frederick appointed its Director in Fall, 2020. As of June 2021 the Director serves on the Local Workforce Development Board.

Section 12 – Jobs for Veterans State Grants Functions This Section should include –

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

The AJC provides "Priority of Service" to veterans and their eligible spouses in accordance with the Jobs for Veterans Act of 2002 and the Veterans' Benefits, Health Care, and Information Technology Act of 2006. The purpose of Priority of Service is to give first consideration for program participation to covered Veterans and eligible spouses who also meet the eligibility criteria of a federal Department of Labor training, employment, or placement service in any workforce preparation program. Local Workforce Development Areas will ensure all vendors follow Priority of Service provisions.

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

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

**Note:** All criteria for veteran and spouse eligibility will be applied as written in Maryland's WIOA State Plan, Section 9. (review for more details on veteran and spouse eligibility)

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

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

1 <sup>st</sup>	Veterans and eligible spouses who are also low-income, recipients of public assistance and/or basic
Priority	skills deficient
2 <sup>nd</sup>	Individuals who are not veterans or eligible spouses, are recipients of public assistance, other low-
Priority	income individuals, or individuals who are basic skills deficient
3 <sup>rd</sup>	Voterons and digible spauses who did not most "first priority" conditions
Priority	Veterans and eligible spouses who did not meet "first priority" conditions
4 <sup>th</sup>	Driggity, nanulations actablished by the Covernor or LWDD
Priority	Priority populations established by the Governor or LWDB
5th	Individuals who are residents of the Frederick Local Area and who are not veterans and do not
Priority	meet criteria to be considered a target population

#### **Customer Service Flow for Veterans**

AJC staff provides core services and initial assessments to veterans.

The receptionist or other AJC staff who work at the front desks are trained to determine whether any customers are veterans. Information can also be gathered on veteran status when the AJC front desk has customers

complete their county's "Customer Activity Sheet". Customers who self-attest to veteran status shall receive priority of service from this point forward.

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

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

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

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

## **Verifying Veteran Status**

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

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

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

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

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

### Veterans and Spouses as Dislocated Workers

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

- 1. Has been terminated or laid off, or received a notice of termination or layoff from employment;
- 2. Is eligible for, or has exhausted, unemployment insurance (UI) benefits;
- 3. Has demonstrated an appropriate attachment to the workforce, but is not eligible for UI and is unlikely to return to a previous industry or occupation;
- 4. Has been terminated or laid off, or **received notification** of termination or layoff from employment as a result of a permanent closure or substantial layoff;
- 5. Is employed at a facility where the employer has made the general announcement that the facility will close within 180 days;
- 6. Was self-employed, but is unemployed as a result of general economic conditions in the community or because of a natural disaster;
- 7. Is a displaced homemaker as defined by WIOA 3(16); or,
- 8. Is the spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of Title 10, U.S.C.), and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member; or is the spouse of a member of the Armed Forces on active duty and is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

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

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

In the case of separating service members, because they may be on a terminal leave from the military, a separating service member may begin to receive career services while the service member may still be part of the Active Duty military, but has an imminent separation date. It is appropriate to provide career services to

separating service members who will be imminently separating from the military, provided that their discharge will be anything other than dishonorable.

### Jobs for Veterans State Grant (JVSG) Funds Are Provided to Fund Two Staff Positions

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

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

### Monitoring Priority of Service

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

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

Optional Template Language: Local Veterans Employment Representatives (LVER) conduct outreach to employers and engage in advocacy efforts with hiring executives to increase employment opportunities for veterans and encourage the hiring of veterans. The <u>Local Board</u> will promote LVER services through social media, job fairs and email blasts based on information provided to the <u>Local Board</u> by the LVER. The <u>Local Board</u> will include the LVER in employer meetings convened in support of determining employer needs related to Career Services, Training Services, or Educational Services. The LVER will be included in meetings and efforts convened by and on behalf of the AJC Partners, including meetings and efforts convened by the One Stop Operator.

### Section 13 – Trade Adjustment Assistance for Workers Program Functions

The Trade program provides aid to eligible workers who lose their jobs, or whose hours of work and wages are reduced, because of increased imports or exports or production transfers abroad. The purpose of the program is to return trade-affected workers to suitable employment as quickly as possible with the seamless provision of coordinated resources, support, skills and training they may need.

Trade Adjustment Assistance Employment and case management services include:

- Interview and review training opportunities for each trade-affected worker;
- Inform trade-affected workers of the services and allowances available;
- Register in Maryland Workforce Exchange and complete Trade Adjustment Assistance application;

- Provide initial assessments;
- Development of an Individual Employment Plan with the affected worker;
- Help them secure appropriate training;
- Monitor their training progress;
- Devise a training waiver process;
- Provide access to workshops and other employment resources;
- Coordinate other employment benefits that workers may be eligible for;
- Inform trade-affected workers about supportive services available through partner programs;
- Co-enrollment with Adult, Dislocated Worker, or other appropriate partner program to provide comprehensive wrap-around services and reduce barriers;
- Rapid Response Services;
- Follow-up Services;
- Facilitate the early filing of petitions for any workers that are likely to be eligible for benefits under the Trade Act; and
- Perform outreach to affected workers, intake of, and orientation for adversely affected workers and adversely affected incumbent workers covered by a certification.

MD Labor's Trade Adjustment Assistance policy can be found here: http://www.labor.maryland.gov/employment/mpi/mpi11-19.pdf

USDOL's Trade Adjustment Assistance Final Rule can be found here: https://www.dol.gov/sites/dolgov/files/ETA/tradeact/pdfs/TAA\_Final\_Rule\_1205\_AB78.pdf

This Section should include –

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

Trade affected workers will be co-enrolled with the WIOA dislocated worker program or other appropriate program to ensure the availability of a comprehensive array of services and the integration of workforce development programs. Trade staff and WIOA partners will coordinate efforts to provide opportunities for Trade affected workers to obtain skills, services, resources and support in a quick and effective manner to return the trade-affected worker back to suitable employment.

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

State staff in the American Job Center will be responsible for providing the initial meeting and assessments, ensure enrollment in MWE, labor market information and delivering Rapid Response service, if not already provided and to make the participants aware of all the available services and allowances that the Trade

Adjustment Assistance Program can provide. Title I staff will coordinate with Trade/State staff on co-enrollment and case management strategies.

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 benchmarks every 60 days and ensure a service is provided every 90 days for the Trade affected worker, as well as ensure any needs and barriers are addressed. Staff will coordinate on all employment, case management and follow-up activities.

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

By following an established process flow within the AJC, co-enrollment of Trade affected workers will be ensured to allow for more efficient use of public workforce system resources and reduce barriers to program integration. Participants will be made aware of their co-enrollment. In the event that a Trade affected worker declines co-enrollment or is not eligible for co-enrollment, documentation must be provided and maintained. Declining co-enrollment has not effect on eligibility for benefits and services under the TAA Program.

Section 14 – Unemployment Insurance Functions This Section should include –

(A) A description of 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.

Title III staff provide basic career services for individuals seeking reemployment. The emphasis is on barrier reduction, customer need and who is best to help the customer. Partner referrals for supportive services and or training, if indicated. Title III staff assist the unemployed with utilizing the tools to make a claim and answer basic troubleshooting questions for the claim or ongoing filing requirements in the Beacon system. Title III management will ensure staff members are maintaining their program knowledge with UI / Beacon through training provided by UI staff.

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

Both RESEA and ROW programs offer claimants seminars to facilitate an expeditious return to work. Both introduce the claimant to services offered within the AJC. Title I business services team members are available to provide information on potential matches to openings. Partners are invited to either briefly present to the seminar participants or provide information on current job openings.

RESEA participants create an individual reemployment plan and are asked to pick activities / services to attend which will assist them in their plan to move forward. In a one-on-one Individual Reemployment Plan session, RESEA staff members assist participants in picking two (2) reemployment activities that must be completed within 45 days. RESEA staff follow up with claimants to obtain a status on the completion of the plan and progress of the search and to offer further assistance via a required subsequent RESEA one-on-one session 5 weeks later.

# Section 15 – Senior Community Service Employment Program Functions

This Section should include -

- (A) A list of Senior Community Service Employment Program (SCSEP) providers in the Local Area. Explain how SCSEP is administered in the Local Area, including grantee and sub-grantee information, if applicable.
  - 1. The Center for Workforce Inclusion is the National Grantee and utilizes sub-grantees to implement SCSEP. The following is a list of their sub-grantees:
    - a. Jewish Council of the Aging of Greater Washington (Administering service to Frederick and Montgomery Counties)
- (B) A description of how SCSEP services will be provided in the AJC system within the Local Area. Include the components of the SCSEP program that are offered in the Local Area.

When inquiring about the SCSEP Program at an AJC, the applicant meets with the employment specialist and is assisted with registering in Maryland Workforce Exchange. The employment specialist also explains the program and process of becoming a participant to the applicant. The employment specialist tries to ensure the best match for both participant and host agency.

## Section 16 – WIOA Section 188 and Equal Opportunity Functions

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

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

This Section should include -

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

Robert A. Gunter
Frederick County American Job Center
200 Monroe Ave., Suite 1
Frederick, MD 21701
Email: bob@blueops.us

Tel: 240-490-9850 or 301-600-2255

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(B) A description of how entities within the AJC delivery system, including AJC operators and the AJC partners, will comply with Section 188 of WIOA and 29 CFR Part 38, and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities and individuals with Limited English Proficiency, including providing staff training and support for addressing the needs of individuals with disabilities and for individuals with Limited English Proficiency.

The Board, Partners and One-Stop Operator (Operator) are committed to ensuring that all eligible individuals are able to access the Frederick County American Job Center (AJC) and WIOA programs without regard to disability. Equal opportunity, non-discrimination and universal access are cornerstones of each Partner's mission focus and staff training.

Partners and AJC staff offer assistance to all individuals who seek to utilize the center. The newly renovated AJC incorporates customer—centric design principles so to be universally accessible to all customers including new ADA push-button automatic opening doors, wheelchair-accessible computer stations in the center's resource room and purpose-built computer stations for our hearing impaired customers. In addition to onsite auxiliary aids, customers may make requests for reasonable accommodations to the EO Officer and/or to Partners. AJC and Partners distribute materials and collateral that informs customers and the public of their rights to request reasonable accommodations under the ADA.

AJC staff have been trained in the use of and utilize the services of the Language Line for effective communication with Limited English Proficiency (LEP) customers; three AJC staff members speak and write fluent Spanish as well. Language Line posters are displayed throughout the center. Front line staff are also trained in the use of language identification flashcards in order to assist customers with LEP. In-person foreign language interpreters are also utilized as needed/requested. The AJC makes sign language interpreters available for deaf and hearing impaired customers who utilize the services of the AJC. ACJ staff have been trained to assist individuals with auxiliary aids and computer workstations that offer accessible software and tools. Additional training will be offered to AJC staff in collaboration with DORS and community partners. In the fall, 2020 WIOA partners and staff participated in "Unconscious Bias" training coordinated by the one-stop operator. Partners will discuss additional trainings.

- (C) An acknowledgment that the Local Board understands 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, 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 Board acknowledges that, while Section 188 of WIOA and 29 CFR 39 ensure equal opportunity for individuals with disabilities, sub-recipients may also be subject to the requirements of: A) Section 504 of the Rehabilitation Act, which prohibits discrimination against individuals with disabilities by recipients of Federal financial assistance; B) Title I of the ADA, which prohibits discrimination in employment based on disability; C) Title II of the ADA, which prohibits State and local governments from discriminating on the basis of disability; D) Section 427 of the General Education Provisions Act; and E) Maryland Anti-Discrimination laws, including Code Ann. §10-1102-1103, which stipulates that oral language services must be delivered on-site for those in frequent contact with a service provider.

# (D) A description of how the Local Board will ensure meaningful access<sup>20</sup> to all customers.

The Board will ensure meaningful access to all customers including those with LEP by requiring Partners and AJC staff to utilize Board-approved interpreter services such as the Language Line, interpreter agencies (that have been vetted and approved by the State of Maryland), qualified staff members or community partners and other acceptable services so that LEP customers enjoy full and timely access to program services. Partners' responsibilities to LEP customers will be detailed in the local WIOA Memorandum of Understanding (MOU). Additionally, the EO Officer will source other resources as needed to fulfill the Board's responsibilities to LEP customers. The Local Area's Resource Sharing Agreement (RSA) Budget provides funding for interpreters for shared AJC customers.

- (E) A description of the Local Board's procedures for handling grievances and complaints from participants and other interested parties affected by the local AJC system, including partners and service providers. Federal regulation on grievances and complaints can be found at: 29 CFR 38.69-97. Provide a separate description for the:
  - Complaints alleging discrimination on the ground of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries only, citizenship or participation in any WIOA Title I financially assisted program or activity;
  - Complaints and grievances not alleging illegal forms of discrimination. This includes grievances from individuals alleging labor standards violations; and
  - 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.

Complaints alleging discrimination should be reported in writing to the AJC's EO Officer. At the discretion of the complainant, complaints may be reported instead to DLLR's Office of Fair Practice, the State of Maryland's Office of the Statewide Equal Employment Opportunity Coordinator or the U.S. Department of Labor's Civil Rights Center.

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<sup>&</sup>lt;sup>20</sup> The Equal Employment Opportunity Commission provides an example of "meaningful access" as it relates to language access for individuals with Limited English Proficiency as "Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior compared to programs or services provided to English proficient individuals," available at: <a href="https://www.eeoc.gov/eeoc/plan/lap.cfm">https://www.eeoc.gov/eeoc/plan/lap.cfm</a>.

If reported to the AJC's EO Officer, the EO Officer will coordinate with complainant and with applicable Partner or service provider to resolve complaints in accordance with the law, regulation and policy issuance and will enlist support of DLLR's Office of Fair Practices, the Maryland Commission on Civil Rights, legal counsel, Federal authorities and/or other resources as appropriate. All complaints will be investigated in a confidential manner in order to maintain the privacy of the complainant. In collaboration with the Board and Partners, the EO Officer will promulgate local Board complaint policies in order to align Local procedures with the State's new WIOA Nondiscrimination Plan of February 2019.

Frederick County Workforce Services' (WIOA Title I Local provider) grievance and complaint procedure outlines remedies that may be imposed for a violation of any requirement under WIOA Title I, limited to: A)Suspension or termination of payments under the title; B) Prohibition of placement of a participant with an employer that has violated any requirement under WIOA Title I: C) Where applicable, reinstatement of an employee, payment of lost wages and benefits, and re- establishment of other relevant terms, conditions, and privileges of employment; and D) Where appropriate, other equitable relief.

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

WIOA Partners have implemented policies to provide for reasonable accommodation for qualified individuals with disabilities. Employees, customers and members of the public may request reasonable accommodation from the center's EO Officer, or any AJC staff member.

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

WIOA Partners have implemented policies to provide for reasonable accommodation for qualified individuals with disabilities. Employees, customers and members of the public may request reasonable accommodation from the center's EO Officer, or any AJC staff member.

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

American Job Center staff ensure that communications with individuals with disabilities, including individuals with visual or hearing impairments, are as with non-impaired customers. Staff provide appropriate accommodations, equipment or interpreters needed by individuals with disabilities as deemed appropriate and reasonable. The RSA Budget provides funding for additional resources and accommodations as needed.

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

Policies are currently being drafted but AJC staff are equipped with the knowledge and training to serve individuals with disabilities. DORS has provided I-Pads equipped with technology to assist individuals with hearing impairments. The AJC is accessible physically for anyone with a disability, including those with visual impairments.

(J) A description of the steps the Local Board will take to meet the language needs of individuals with Limited English Proficiency who seek services or information. The description should include how the Local Board proposes that information will be disseminated to individuals with Limited English Proficiency, including using oral interpretation and written translation services in accordance with Maryland Anti-Discrimination laws, including 5 Md. STATE GOVERNMENT Code Ann. §10-1101, which stipulates that oral language services must be delivered on-site for those in frequent contact with a service provider.

The Local Board is committed to ensuring that the AJC is welcoming to all including LEP customers. "I Speak" and/or Language Line posters are posted throughout the AJC, listing 38 identifiable languages to aid in the procurement of interpreters. Additionally, AJC staff utilize language flash cards at their workstations to help communicate with LEP customers. Coordinated by the EO Officer, procedures are in place to provide in-person foreign language interpreting services via the State's contract with Ad Astra, Inc. In addition, the center utilizes the services of phone interpretation via the State's contract with the Language Line which can be used with little or no advanced planning for "walk-in" customers. Three AJC staff members are fluent in Spanish and are also available for "walk-in" customers.

Several key documents have been translated into Spanish including the 'Equal Opportunity is the Law' notice. In collaboration with the Board and Partners, the EO Officer will promulgate local Board policies in 2019 regarding vital document translation in order to align local procedures with the State's new WIOA Nondiscrimination Plan of February 2019.

Section 17 – Fiscal, Performance, and Other Functions (Jerome/Michelle) This Section should include –

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

As Chief Local Elected Official (CLEO), the Frederick County Executive has designated the Workforce Services Department as its Fiscal Agent, authorized to manage funds on behalf of the CLEO.

(B) A description of financial sustainability of the AJC services with current funding levels, and a description of the ability to make adjustments should funding levels change.

The dependence of all WIOA Partners on the federal budget process, federal budget funding levels and allocation methodologies results in a level of risk for the sustainability of the American Job Centers.

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. WIOA partner and Board 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, fund transfer requests and colocation with other entities to reduce costs.

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

The Board will use Frederick County Government Purchasing Rules and Regulations, See Attachment C, to address the competitive process and risk assessment of procurement and contracting.

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

The Frederick County Workforce Development Board and WIOA partners have established an excellent reputation for services and responsiveness as it relates to the provision of workforce development solutions. The Board maintains a private-sector majority representation and is frequently engaged in the business community. Members are strong advocates for the workforce system.

Workforce Services and partners in the American Job Center will work together to ensure seamless delivery of services to customers and to demonstrate the "people before performance" philosophy. Customers will be at the center of service delivery.

The Board will take advantage of resources and technical assistance related to the review and evaluation of American Job Centers and the One Stop Operator. If local resources are not sufficient to fund the technical assistance needs of the local Board, the American Job Centers or the One Stop Operator, a technical assistance funding request will be created and sent to the Governor's Workforce Development Board.

(E) A description, including a copy of, the Local Area's Individual Training Account policy. The description should include information such as selection process, dollar limits, duration, etc. and must be in accordance with the State's WIOA Title I Training and the Eligible Training Provider List policy found at: <a href="http://www.labor.maryland.gov/employment/mpi/mpi3-23.pdf">http://www.labor.maryland.gov/employment/mpi/mpi3-23.pdf</a>

FCWS uses training vouchers as the mechanism for ITA programs. This agreement will describe the roles and responsibilities of the training provider, including the ITA payment system. Training vendors agree, in writing, as part of their funding relationship with FCWS, that they will apply any Pell Grant received to the customer's training cost before billing FCWS, or reimburse FCWS if any Pell Grant is received by the school after payment.

Customers who meet the eligibility criteria of respective programs and are unable to find employment at self-sufficient wages due to lack of marketable skills, and who have no barriers to successful participation, are considered for training services. In addition, FCWS customers are requested to show documentation for all possible financial aid from other sources before a training request is approved by FCWS.

Upon the enrollment of a WIOA customer into a training program with an eligible ITA training provider, FCWS will provide the selected training provider with a voucher form for that individual. The voucher form will include the total amount of costs for tuition and fees that will be paid by FCWS, including any Pell Grant, if known. After the voucher form is received, the training provider can submit an invoice to FCWS which sets forth all approved tuition and fees for the WIOA customer. Payment for properly charged tuition and fees shall be made by Frederick County in a timely manner.

Frederick County Workforce Services operates with a flexible training cap, not to exceed \$6,000 for WIOA customers. Duration of training typically do not exceed two years from the start of the training program. Exceptions to the training cap and duration are considered in limited instances and are reviewed on a case-by-case basis by a team.

For training offered we follow our local Individual Training Request Approval policy dated July 31, 2017 and Maryland's Eligible Training Provider List.

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

Training services will be made available to eligible customers in a manner that will ensure customer choice and is in alignment with demand occupations and industries. Depending on individual circumstance and labor market indicators, customers may benefit from:

On-the-job training (OJT) - Training by an employer that is provided to a paid participant while engaged in productive work in a job that provides knowledge and skills essential to the full and adequate performance of the job and is made available through an OJT program; a local policy was established in December of 2018;

**Customized Training -** That is designed to meet the specific requirements of an employer (including a group of employers); and that is conducted with a commitment by the employer to employ an individual upon successful completion of the training; and,

For which the employer:

 Pays a significant portion of the cost of training, as determined by the local Board involved, taking into account the size of the employer and such other factors as the local Board determines to be appropriate, which may include the number of employees participating in training, wage and benefit levels of those employees (at present and anticipated upon completion of the training), relation of the training to

- Registered Apprenticeship programs registered under the National Apprenticeship Act (29 U.S.C. § 50, et. seq.) are included as eligible training providers.
- In the case of customized training involving an employer located in multiple local areas in the State, a significant portion of the training cost, as determined by the Governor, takes into account the size of the employer and other factors as the Governor determines to be appropriate.

**Incumbent worker training**- The purpose of the training is to assist workers in obtaining the skills necessary to retain employment or avert layoff; Incumbent worker training may be used as a talent building strategy and in accordance with WIOA, federal and state guidance. Up to 20% of the adult and dislocated worker allocation may be used for incumbent worker training to upskill individuals who are eligible. A local policy has been in place since April, 2018.

**Transitional employment** - Time-limited work experiences which are to be combined with comprehensive employment and supportive services and are to be designed to help individuals establish a work history, demonstrate success in the workplace, and develop the skills that lead to entry into and retention of unsubsidized employment. Up to 10% of the adult and dislocated worker allocation may be used for transitional employment. The local area follows its Transitional Employment policy.

**Internships and Work Experience** - Planned, structured learning experience that takes place in a workplace for a limited period of time. Work experience may be paid or unpaid, as appropriate. An internship or work experience may be arranged within the private for profit sector, the non-profit sector, or the public sector.

Contract Training will be leveraged to build on customer choice and responsiveness to industry needs. FCWS follows the procurement and contracting rules of Frederick County Government.

Training undertaken through any of the above strategies will be tied to in-demand industries and sectors, and will be subject to the Priority of Service policy.

(G) A description of how the AJCs are utilizing the Maryland Workforce Exchange as the integrated, technologyenabled intake and case management information system for programs carried out under WIOA and programs carried out by AJC partners.

The Maryland Workforce Exchange (MWE) is the labor exchange, case management and performance accountability backbone for the American Job Centers. The Board will advocate extending the full range of MWE capabilities to all American Job Center MOU Partners, and other employment and training partners who have a written data sharing agreement with the Board. The Board will encourage and support the integration of labor exchange, case management and performance accountability toward a common technology platform.

- (H) A description of the Local Board's procedures for conducting oversight and monitoring of its WIOA activities and those of its subgrantee and contractors. *DWDAL's policy on monitoring can be found here:* <a href="http://www.labor.maryland.gov/employment/mpi/mpi7-19.pdf">http://www.labor.maryland.gov/employment/mpi/mpi7-19.pdf</a>. The monitoring plan shall address the monitoring scope and frequency and shall include the following:
  - The roles and responsibility of staff in facilitating this procedure;
  - A requirement that all subgrantee agreements and contracts be monitored at least annually;
  - Procedures for determining that expenditures have been made against the cost categories and within the cost limitations specified in the Act and WIOA regulations;
  - Procedures for determining compliance with other provisions of the Act and regulations and other
    applicable laws and regulations, including the method of monitoring to be used for subgrantees and
    contractors;
  - Monitoring risk factors and risk assessments;
  - Provisions for the recording of findings made by the recipients' monitor(s), the forwarding of such findings to the sub-grantee or contractor for response and the recording of all corrective actions;
  - Provisions of technical assistance as necessary and appropriate; and
  - Specific local policies developed by the Local Board for oversight of the AJC system, youth activities and employment and training activities under Title I of WIOA.

The Board will provide oversight and monitoring of WIOA activities by reviewing program and fiscal monitoring results from audits performed by independent agencies, the MD Labor or federal Department of Labor if relevant to the local area. This review will happen at least annually.

A monitoring system, which includes a questionnaire, participant interviews, and file reviews, is in place to review and report on the WIOA Youth Program which is traditionally the only program sub-awarded in Frederick. The monitoring system in place could be used for other programs as needed. The focus is to monitor for compliance with federal law and regulations, and with state and local policies. Reports shall include program strengths, areas to improve, findings and recommendations for corrective action. Monitoring shall follow the policies, procedures and standards outlined below and shall comply with Uniform Guidance and federal regulations referred to in Request For Proposal. All monitoring visits are documented and follow up reports are provided by FCWS.

It is the responsibility of FCWS to provide the necessary technical assistance to sub-recipients and contractors prior to and during the duration of the program activity. This assistance may be the result of issues uncovered during monitoring or, simply, a result of questions that arise during the operation of the program. FCWS will provide technical assistance whenever appropriate, needed or warranted.

Monitoring of program operations (functions and systems related to the provision of services to registered customers) shall be under the direction of the Frederick County Workforce Services Youth Program Manager. Monitoring shall include reviewing activities, functions and services for compliance with federal, state and local regulations and policies.

The monitoring system includes:

- 1. Review of RFP contract for compliance and oversight.
- 2. In-house record review and on-site reviews and interviews.

- 3. Formal on site review at least annually of fiscal, program and sub-recipient monitoring by Workforce Services assigned staff and Youth Committee members.
- 4. Oral review of observations with appropriate staff to discuss observations and suggest appropriate corrective action, as needed.
- 5. Response period of no more than 60 working days for program provider staff to prepare and submit responses to formal review.
- 6. Formal written report released by Workforce Services' Career Center and Youth Services Manager in collaboration with the Workforce Development Board Youth Committee, Fiscal Manager and Monitoring Team within 10 working days of the program provider response.
- 7. Any comments from the Program Provider Manager (or appropriate Manager) and Workforce Services Director are maintained in the monitoring file and the recommended follow up action is monitored by the Workforce Services Director.

FCWS operational staff ensure that sub recipient and contractor expenditures are made against appropriate cost categories and within WIOA cost limitations by:

- a) using the MIS to verify enrollment in adult, dislocated worker or youth cost categories;
- b) verifying expenditures against FCWS customer obligation report;
- c) approving expenditures and charging these expenditures to the appropriate cost category;
- d) quarterly reviewing these expenditures against the County's financial report preparing a quarterly fiscal reports to the state that reflects expenditures that meet cost limitations and are in the appropriate cost category.

As necessary and appropriate, the Board will provide technical assistance to any sub recipients when a sub recipient is acting in good faith to achieve the desired outcome. The Board's Executive Committee will work in collaboration with its One-Stop Operator and Fiscal Agent, to ensure oversight of the system for fiscal and program performance.

The WDB Youth Committee will be responsible for overseeing youth vendor performance and may designate staff to review expenditures and performance on a quarterly basis after selection of appropriate youth vendor(s). For employment and training activities under Title I of WIOA, the Board Executive Committee will review reports of expenditures and vendor performance at least annually to ensure compliance with program and performance requirements as set forth in WIOA law and regulations. As deemed appropriate and necessary, based on these reports, the Board will make recommendations to the American Job Center partners, and youth employment and training provider(s) to ensure continuous improvement.

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

WIOA partner staff will take the steps necessary to ensure the privacy of all personally identifiable information obtained from participants and/or other individuals and to protect such information from unauthorized

disclosure following the MD Labor Privacy and Data Security policy published in 2019. The local area will also have a policy that aligns with Frederick County Government.

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

The Board follows the Procurement and Contracting System Procedures of Frederick County Government. These are included in Attachment C. Within the Frederick County Purchasing Regulations and Rules emergency purchases are noted. The Board assures that its procedures conform to the standards in DOL regulations set forth in 29 CFR Part 95, Part 97 and 2 CFR 200.

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

The acquisition, management, and disposition of property adhere to the Property Management Procedures taken from USDOL regulations **29 CFR Part 97 and 29 CFR Part 95**. Frederick County Government Purchasing Rules and Regulations are also followed

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

A member of the Local Board may not vote on or participate in any matter under consideration by the Local Board if it:

- 1. Is regarding a service provided by that member (or by an entity that the member represents);
- 2. Would provide direct financial benefit to the member or the immediate family of the member;
- 3. Engage directly or indirectly in any business transaction or private arrangement for profit (including any third-party transactions) that develops from or is based upon the member's official title or authority on the Board;
- 4. Participate in the negotiation of, or decision to award contracts or grants with or for any entity in which the member has a financial or personal interest; or
- 5. Would constitute a conflict of interest as specified in Maryland State Law at State Government §15-501 et seq., §15-803 et seq., the Code of Maryland Regulations (COMAR) 23.02.0, GWIB Policy Issuance 2015-01, and Frederick County Ethics Ordinance Section 1-7.1.5.

Local workforce development Board members must:

- 1. Recuse themselves from their official duties if there is a real or perceived conflict of interest;
- 2. Advise the Board of any potential or perceived conflicts of interest;
- 3. Ask the Board for guidance if there is any doubt as to whether a specific situation involves or constitutes a real or perceived conflict of interest; and
- 4. Complete and sign the Board conflict of interest code statement and acknowledgement form at the beginning of the initial term and each fiscal year.
- (M) A description of the Local Board or fiscal agent's accounting procedures, including the procedures used in preparing reports to the State. In addition to the requirement that all financial transactions be conducted in compliance with Generally Accepted Accounting Principles (GAAP), the fiscal management system must include the following in the accounting procedures. This description must address how the fiscal system:
  - Tracks funding types, funding amounts, obligations, expenditures and assets;
  - Permits the tracking of program income, stand-in costs, and leveraged funds; and
  - Is adequate to prepare financial reports required by the State.

Workforce Services, as the fiscal agent, utilizes Frederick County Government Financial System (FCGFS) accounting procedures, accounts payable/receivable and budget procedures, as well as supplemental department procedures as needed to report in compliance with federal and state requirements. The Chart of Accounts utilized by Frederick County ensures an encoding system that allows for the tracking of funding types for each funding source/types, and the amount of funding, encumbrances/obligations, expenditures, and current balances. FCWS staff approve and record all contract/individual training obligations in the FCGFS and/or this supplemental FCWS Obligations Log. Additionally, information is accessed from the system to complete the reporting of stand-in costs and leveraged funds. Program Income does not occur in Frederick County, however if needed, the system would permit tracking of Program Income.

The Workforce Services Finance Services staff uses data from Frederick County Government's fiscal ledger and supplemental spreadsheets to prepare quarterly financial reports. Prior to submission to DLLR a Frederick County Accountant reviews and approves the FCWS staff prepared quarterly reports.

The Frederick County Department of Finance has the fiduciary responsibility for all funds received and disbursed by the County agencies. Through the use of the FCGFS and other supplemental record keeping, FCWS assures that all financial transactions are conducted and records maintained in accordance with "Generally Accepted Accounting Principles".

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

The Finance Services Team within FCWS has the primary responsibility for working with WIOA funds. The Finance Services Team consists of a Workforce Services Manager of Finance, Fiscal Specialist, and an Administrative Specialist V. Daily oversight of the team and the FCWS budget is provided by the FCWS Manager of Finance and ultimately the Director. Collaboration occurs between the Workforce Services Manager of

Finance, Manager of Youth Services, Manager of Career and Business Services and the Director. FCWS staff work closely with staff from Frederick County Department of Finance, Budget, and Procurement and Contracting, which has the fiduciary responsibility for all funds received and disbursed by the County. Primary staff work in collaboration with the Workforce Development Board and are responsible to the County Executive.

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

Frederick County Workforce Services uses the Frederick County Government Financial System (FCGFS) operated by the Frederick County Department of Finance as well as supplemental manual record keeping by FCWS Finance Services staff. Through the use of the FCGFS and other supplemental record keeping, FCWS assures that all financial transactions are conducted and records maintained in accordance with federal WIOA requirements.

FCWS Finance Services staff review transactions and expenditures at approval to ensure compliance with the federal and state guidelines regarding allowable costs and cost classification. FCWS follows internal policies that account for separation of duties as it relates to fiscal transactions. This separation of duties is an element of all relative local fiscal policies. Prior to making payments, FCWS staff assign accounting codes to the expenditure report/invoice in order to identify the proper funding source, cost category and line item. Staff review all invoices for payment and costs charged in the financial system to ensure that costs are allowable and recorded in the proper account. Adequate supporting documentation is maintained to permit tracking of funds to a level adequate to establish that funds are not used in violation of WIOA standards or United States Department of Labor regulations.

## (P) A brief description of the following:

- Fiscal reporting system,
- Obligation control system,
- ITA payment system,
- Chart of account system,
- Accounts payable system,
- Staff payroll system,
- Participant payroll system, and
- Participant stipend payment system.

#### **Fiscal Reporting System**

FCWS has the ability to prepare accurate and timely financial information for both internal management reports and expenditure reports to the MD Labor FCWS uses the Frederick County Government Financial System (FCGFS) to record and track fiscal information. FCWS prints at the least quarterly transaction detail reports.

The reports include expenditures and encumbrances by grant agreement and cost category. FCWS has online access to the FCGFS. This online system provides current financial information that can be reviewed and printed at any time.

Using the information provided by the FCGFS as well as manually prepared supplemental worksheets, FCWS Finance Services staff prepare financial reports for internal management, and quarterly financial reports for submission to MD Labor. Accrued expenditure information applicable to the reporting period is included in both the internal reports and quarterly reports to the State. An adequate audit trail is available to support the quarterly expenditure information reported to MD Labor. Worksheets for each funding source are prepared which include the expenditures from the FCGFS, accruals and any adjustments that apply to the reporting period. These worksheets are the basis for preparing State reports and serve as supporting documentation for the quarterly reports.

## **Obligation Control System**

Frederick County Government Financial System (FCGFS) provides the mechanism for adequate obligation control. The system records the amount of funds available for each grant, the number of encumbrances, the amount of expenditures and the amount of the current balance. FCWS staff approve and record all contract/individual training obligations in the FCGFS and/or this supplemental FCWS Obligations Log. A current balance of funds, total funds available minus encumbrances and expenditures, is identified for each grant agreement.

FCWS staff review and reconcile this training information usually monthly and always quarterly. Training obligations are reviewed internally by FCWS Leaders regularly. This ensures adequate control over both obligations and expenditures.

### Individual Training Accounts (ITA)

FCWS uses training vouchers as the mechanism for ITA programs. This agreement will describe the roles and responsibilities of the training provider, including the ITA payment system. Training vendors agree, in writing, as part of their funding relationship with FCWS, that they will apply any Pell Grant received to the customer's training cost before billing FCWS or reimburse FCWS if any Pell Grant is received by the school after payment.

In addition, FCWS customers are requested to show documentation for all possible financial aid from other sources before a training request is approved by FCWS. Upon the enrollment of a WIOA customer into a training program with an eligible ITA training provider, FCWS will provide the selected training provider with a voucher form for that individual. The voucher form will include the total amount of costs for tuition and fees that will be paid by FCWS, including any Pell Grant, if known. After the voucher form is received, the training provider can submit an invoice to FCWS which sets forth all approved tuition and fees for the WIOA customer. Payment for properly charged tuition and fees shall be made by Frederick County in a timely manner.

# **Chart of Account System**

The Chart of Account system utilized by Frederick County operates on an encoding system that allows for the classification of funds by grant and cost category. The new encoding system effective 2018 is comprised of a series of fields which indicate: account number, accounting unit, activity, and account category. This new

Enterprise system ensures that funds are adequately tracked and reported in compliance with federal and state requirements.

### **Accounts Payable System**

The Frederick County Department of Finance is responsible for the disbursement of funds. After approval and coding by FCWS Finance staff, expenditure invoices are forwarded to the Department of Finance for payment or paid via a PCard. Expenditure information is then entered into the County financial system using the appropriate grant codes, including activity and account category. PCard transactions are coded and approved via the same system. Each transaction is identified in the general ledger. All disbursements are made by check or electronic payment. FCWS staff closely monitor the general ledger transactions to ensure that all payments are charged to the proper grant and cost category.

### Staff Payroll System & Participant Payroll and Stipend System

Bi-weekly time and attendance reports are utilized for FCWS staff and customers. These reports/timesheets and/or time distribution sheets include attendance information for each day of the week and are completed online by the staff person, and approved by the appropriate supervisory personnel.

Staff and customer timesheets are then forwarded, on-line, to the County Payroll Office by the FCWS office. The County Payroll Office checks leave days against leave records (for staff only).

The County Payroll Department generates payroll checks (based on information supplied electronically on timesheets). Salary and Fringe reports can be generated by FCWS Fiscal Specialist to list staff by program activity and account category. Printouts will include account number, customer or staff name, employee ID number, gross salary and fringe cost breakdown which is needed in supplemental reports.

The majority of staff payroll is distributed bi-weekly via direct deposit unless a change occurs within an employee's account. Then a live check is received prior to the next direct deposit. All staff can access their individual payroll data via their on-line employee service secure tool. As an internal control, all checks are received by the Fiscal Specialist then distributed direct to employees or to supervisors for distribution.

Customers have the option of direct deposit or a bank card which automatically is loaded with their payroll. Supportive Services

Supportive services include transportation, child care, dependent care, housing, and needs-related payments that if applied, enable an individual to participate in career and training services. In the context of a coordinated one-stop delivery system, Frederick County Workforce Services staff shall take into consideration all of the available supportive services resources so that participants may receive the best supportive services available and to ensure that funds are spent to maximize participants' opportunity to participate in career and training services.

However, in the event assistance cannot be provided through other means, staff will assess and document in the MWE notes/case management activities the need for supportive services funded by FCWS/WIOA and follow FCWS local Supportive Services policy developed which addresses eligibility, limitations, approvals and payments.

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

FCWS staff prepare and submit cash requisitions to the Frederick County Department of Finance who submits an invoice with cash requisitions to the MD Labor on a quarterly reimbursement basis. The total amount of funds requested for each grant agreement includes cash expenditures to date and may include an estimate of cash expenditures for the upcoming month. After funds are made available by the MD Labor, the funds are deposited into the appropriate bank accounts by staff from the Frederick County Department of Treasury. Procedures are in place to monitor cash balances. Since FCWS receives funds on a reimbursement basis, excess WIOA cash will not be kept on hand.

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

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

FCWS uses Administrative and Program cost pools for the accumulation and distribution of staff and operating costs that cannot be directly assigned to a specific WIOA funding source or activity. FCWS assures that it uses cost allocation methods that are both reasonable and consistently applied. FCWS will also maintain adequate documentation to support the distribution of costs to the various funding sources and cost categories. Costs that benefit a single funding source and/or cost category will be directly charged. All indirect and unassigned costs will be identified and accumulated in the cost pools and distributed based on acceptable cost allocation methodologies.

Staff costs are accumulated in a cost pool based on staff time distribution reports and/or distributed to a WIOA cost activity/program directly. Staff certify bi-annually if they work directly on one WIOA program and do not need to complete a time distribution report. The staff time distribution reports are completed on a bi-weekly basis and are signed by each employee as well as the appropriate supervisory personnel. The biweekly time distribution reports document the number of hours spent on the various program activities on a daily basis. Costs will be distributed between the cost activity categories based on the number of documented hours worked on each cost activity.

The allocation of personnel and operating costs charged to the cost pools between administration and program will be based on expenditures. Costs will be distributed quarterly between WIOA grants and local funds using an acceptable method that fairly measures the extent to which benefits are received and are reasonable. Direct program costs and/or participant enrollments are suggested bases that may be used to equitably distribute costs between WIOA program grants. FCWS distributes the costs in the pools on a quarterly basis.

FCWS assures pooled costs will be consistently applied during the program year no matter what basis is used to distribute the pooled costs.

WIOA funds including allocations for the Adult Program, the Youth Program, and the Dislocated Worker Program, as well as any WIOA performance awards and/or other WIOA discretionary awards, may be included in the Administrative and Program cost pools. Allocation of AJC costs are negotiated by the various partners and memorialized in the Memorandum of Understanding and Resource Sharing Agreement in accordance with WIOA laws, regulations and guidance.

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

If a debt is established as the result of an audit or any other circumstances, cash repayment is the primary sanction for the improper expenditure of WIOA funds. Debt collection procedures begin with the forwarding of a written payment demand letter that includes the amount of the debt and the date the payment is due to FCWS. Generally the demand letter will ask for repayment in a lump sum, but a schedule of installment payments may be established if deemed appropriate. If FCWS staff, after adequate negotiation, determine that cash repayment is not possible, other methods to satisfy the debt may be explored. FCWS may accept allowable WIOA services in lieu of cash as a satisfactory alternative. Such services must be in addition to those provided under any existing agreements.

Finally, another method for settling debts is the reduction of payments to current sub recipients while the sub recipients continue to provide WIOA services at existing levels. If debts cannot be satisfied through the methods described above, FCWS will turn the case over to the Frederick County Attorney's Office to initiate formal collection proceedings.

### Summary

The Frederick County Workforce Development Board will continue to serve as the strategic leader for the local workforce area. The Board will work in partnership with the Governor and the Governor's Workforce Development Board, and the Maryland Department of Labor and local elected officials to facilitate and support talent development strategies that advance opportunities for all job seekers; to include, but not limited to low-skilled adults, young adults, veterans, mature workers, low-income households, long-term unemployed, dislocated workers and individuals with disabilities. The Board will work to foster innovation, industry partnerships, engage stakeholders, and guarantee streamlined operations and service delivery excellence.

#### **Public Comment Period**

The public was invited to submit comments on the draft local plan between February 1, 2021 – March 1, 2021.

## **Key Definitions**

American Job Center: American Job Centers (also known as One-Stop Centers) are designed to provide a full range of assistance to job seekers under one roof. Established under the Workforce Investment Act, and reauthorized in the Workforce Innovation and Opportunity Act of 2014, the centers offer training referrals, career counseling, job listings, and similar employment-related services. Customers can visit a center in person or connect to the center's information online or through kiosk remote access.

Americans with Disabilities Act: A federal law providing for comprehensive civil rights protection to individuals with disabilities in areas of employment, public accommodations, state and local government services and telecommunications. (PL101-336)

Adult Basic Education: Academic instruction and education services below the postsecondary level that increase an individual's ability to—(A) read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; (B) transition to postsecondary education and training; and (C) obtain employment."

**Application:** The process which requires the physical attainment of all necessary eligibility documentation regarding citizenship, age, income, selective service registration (if applicable) plus basic skills assessment for math and reading levels. Upon completion of eligibility determination, and signing of the application, eligible customers are placed into the applicant pool for consideration for enrollment into intensive services.

**Apprenticeships:** An employer-driven model that combines on-the-job learning with related classroom instruction that increases an apprentice's skill level and wages.

**Assessment:** A judgment of vocational interests, abilities, previous education and work experience, income requirements, and personal circumstances.

**Barriers to Employment:** Conditions that may make employment difficult for certain individuals. Individuals with such barriers may include: single parents, displaced homemakers, youth, public assistance recipients, older workers, substance abusers, teenage parents, veterans, ethnic minorities, and those with limited English speaking ability or a criminal record or with a lack of education, work experience, credentials, transportation or child care arrangements.

Basic Education: Instruction usually conducted in an institutional setting that is directed towards imparting the basic skills of communication, computation, problem solving, health, consumer development, and citizenship. Instruction for youth could include, but not be limited to, enrollment in a secondary school. Adult Basic Education (ABE) would include upgrading the same basic skills, however, it is directed towards adults who are generally classified as functionally illiterate, undereducated, or whose inability to speak, read or write the English language constitutes a substantial impairment of their ability to get or retain employment commensurate with their readability. Such instruction is designed to raise the level of education of such individuals with a view to making them less likely to become depend on others, to improving their ability to benefit from occupational training and other wise increasing their opportunities for more productive and profitable employment.

**Basic Literacy Skills:** Reading, writing, mathematics, problem solving and interpersonal skills training that enable adults to communicate in English, use math, obtain a high school diploma or GED and become productive, employable citizens.

**Basic Skills Deficient:** Deficient in Basic Literacy Skills: Is an individual who, at a minimum, meets the definition of Basic Skills Deficient; or is unable to compute or solve problems, read write, or speak English at a level necessary to function on the job, in the individual's family, or in society. (20 CFR Part 664.205(a))

**Career Pathways:** A series of connected education and training programs, work experiences, and student support services that enable individuals to secure a job or advance in an in-demand industry.

Career Services: Career services for adults and dislocated workers must be available in at least one Job Center in each local workforce development area. There are three types of career services: Basic career services; Individualized career services; and Follow-up services.

Case Management/Individualized Service: A customer-centered approach in delivery of services, designed to: 1 Prepare and coordinate comprehensive employment plans, identifying barriers to participation and employment; devise service strategies for customers to ensure access to workforce investment activities and supportive services, using, where feasible, computer-based technologies; and 2. Assist in the enrollment of

customers into allowable activities designed to enhance employability (i.e. motivation, assessment, job preparation workshops, educational classes and/or training, and/or employment services), providing job development and placement services, and assisting individuals and families in accessing community services, addressing emergency assistance and crisis intervention and immediate needs (i.e. food, housing, clothing, and transportation); and 3. Provide job and career counseling during program participation and after job placement. Chief Local Elected Official: The chief elected executive officer of a unit of general local government in a local area.

Core Services: Services available to all customers (universal access) of the American Job Center or affiliate partner agency. Core services include self-help services and services requiring minimal staff assistance as described under Section 134 (d) (2) of the Act. Note: When staff assistance is required to provide supportive services to Core service customers, registration is required and counted for performance measurement purposes.

Credentials: A credential is awarded in recognition of measurable technical or industry/occupational skills necessary to obtain employment or advance within an occupation. Credentials are generally based on standards developed or endorsed by employers and/or industry associations. Credentials may include, but are not limited to, a high school diploma, GED, or other recognized equivalents, postsecondary degrees/certificates, occupational skills certificates or certifications (i.e., HVAC repair, Phlebotomy, Veterinary Assistant, etc.), occupational licenses (i.e., CNA/GNA) and other recognized certificates of industry/occupational skills completion sufficient to qualify for entry-level or advancement in employment.

Reference: TEGL 10-16, Change 1, p.15

**Customer:** A Customer is any person seeking assistance to find employment or training, whether employed or unemployed, and employers who need qualified workers for their company or training for the workers who are already employed with them.

Customer-Centered: Services and improvements to the system are made based on customer feedback. Customer-Centered Design/Human Centered Design: Human Centered Design framework expands the range of research techniques to help build more accurate profiles and deeper understanding of job-seekers, students, and employers. This results in concrete solutions with a sharper focus on solving problems. Disabled Veteran: A veteran who is entitled to compensation under laws administered by the Veterans Administration, or an individual who was discharged or released from active duty because of a service connected disability. Dislocated Worker: An individual who: has been terminated or laid off from their job, or who received a notice of termination or layoff, from their employer; is eligible for or has exhausted their unemployment payments; or has been employed for a duration sufficient to demonstrate, to the appropriate entity at a one-stop center, attachment to the workforce, but cannot get unemployment compensation because of low earnings or having done work for an employer not covered under a State unemployment compensation law; and is unlikely to return to a previous industry or occupation; 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; is employed at a facility which the employer has made a general announcement that such facility will close within 180 days; or for purpose of eligibility to receive services other than training services, intensive services or supportive services, is employed at a facility at which the employer has made a general announcement that such facility will close; was self-employed (including employment as a farmer, 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, is a displaced homemaker; or is the spouse of a member of the Armed Forces on active duty and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member; or is the spouse of a member of the Armed Forces on active duty and who meets the criteria.

DOL, USDOL: The U.S. Department of Labor, including its agencies and organizational units.

**Economic Development:** Local planning and zoning commissions or Boards, community development agencies, and other local agencies and institutions responsible for regulating, promoting, or assisting in local economic development.

**Eligible Provider:** The term "eligible provider", used with respect to: 1. Training services, means an organization, such as a public or private college and university, or community-based organization whose application has been approved for the State list of training services as identified; 2. Intensive services, means a provider who is identified or awarded; 3. Youth activities, means a provider who is awarded a grant or a contract; 4. Other workforce investment activities, means a public or private entity selected to be responsible for such activities, such as a one-stop operator designated or certified.

**Eligible Training Provider List (ETPL)**: A statewide collection of providers that are approved to give services through the One-Stop system. These lists contain consumer information, including cost and performance information for each of the providers, so that customers can make informed choices on where to use their Individual Training Accounts.

**English as a Second Language (ESL):** English language education for adults whose inability to understand, speak, read, or write the English language is a barrier to their ability to get or keep employment. This also has effects on their real ability to function in society or successfully complete the citizenship application process.

**Firewall:** Separation as a part of the procurement process.

**GED-General Equivalency Diploma:** A high school equivalency diploma, which is obtained by passing the General Educational Diploma Equivalency Test that, measures skills and knowledge generally associated with four years of traditional high school instruction.

**In-Demand Industry Sector or Occupation:** An industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the State, regional, or local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors; or an occupation that currently has or is projected to have a number of positions (including positions that lead to economic self-sufficiency and opportunities for advancement) in an industry sector so as to have a significant impact on the State, regional, or local economy, as appropriate.

Individual with a Barrier to Employment: A member of one or more of the following populations: displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians, as such terms are defined in section 166; persons with disabilities, including youth who with disabilities; older individuals; ex-offenders; homeless individuals as defined in the Violence Against Women Act of 1994, or homeless children and youths as defined in the McKinney-Vento Homeless Assistance Act; youth/young adults who are in or have aged out of the foster care system; person who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; eligible migrant and seasonal farmworkers; persons within 2 years of exhausting lifetime eligibility under part A of title IV of the Social Security Act; single parents including single pregnant women; long-term unemployed person; and such other groups as the Governor involved determines to have barriers to employment.

Individual with a Disability: 1. In general. An individual with any disability (as defined in section 3 of the Americans with Disabilities Act of 1990 (42 U.S.C. 12`02)). 2. Individuals with Disabilities. More than one individual with a disability.

Individual Training Accounts (ITA): An expenditure account established on behalf of an eligible customer in WIOA Title IB adult, youth and dislocated worker programs to purchase training services from eligible providers they select in consultation with the case manager, counselor or coordinator.

Individualized Services: Services available to adults and dislocated workers have been determined in need of services to get a better job in order to gain self-sufficiency. Intensive Services include individual career planning, resume preparation, job clubs, career counseling, internships, and comprehensive assessments. Basic education, ESL, and basic computer literacy are also sometimes considered intensive. Note: All customers in intensive services must be registered and are counted for performance measurement purposes. Internships: WIOA considers an internship to be a form of paid or unpaid work experience, defined as an opportunity for exposure to the requirements of a particular occupation or industry, the work environment and the behavioral expectations for success on the job. Such work experiences are not expected to provide formal training for occupational skills, although some skills may be learned.

**Justice Involved:** An adult or juvenile who is or has been subject to any stage of the criminal justice process, and for whom services under this Act may be beneficial; or who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

**Labor Force:** The total of all civilians classified as employed and unemployed and members of the Armed Forces stationed in the United States. (Bureau of Labor Statistics Bulletin 2175).

**Labor Market Information:** Labor Market Information (LMI) must be provided to customers in every program. LMI generally involves four major areas of information, which include national job trends (including supply and demand), local job opportunities, education and skill requirements for jobs, and job seeking skills (writing resumes, job interview techniques, etc.).

**Life Skills:** Those skills which are included in adult literacy dealing with such topics as consumer economics, government and law, occupational knowledge, community resources, and health that are included into an educational agency's basic literacy skills course of study.

**Local Area:** The local workforce development area(s) designated by a Governor for delivery of WIOA services. **Lower Living Standard Income Level:** The income level (adjusted for regional, metropolitan, urban, and rural differences and family size) determined annually by the Secretary of Labor based on the most recent lower living family budget issued by the Secretary.

**Local Workforce Development Board:** A local workforce development Board established under section 107 of WIOA, as one of the 10 federally recognized local areas in Colorado.

Low Income Individuals: The term "low-income individual" means a person who: 1. receives, or is a member of a family that receives, cash payments under a Federal, State, or local income-based public assistance program; 2. received an income, or is a member of a family that received a total family income, for the 6month period before application for the program involved (besides unemployment compensation, child support payments, payments described in subparagraph (A), and old-age and survivors insurance benefits received under section 202 of the Social Security Act (42 U.S.C. 402) that, for their family size, is not more than the higher of—(i) the poverty line, for an equivalent period; or (ii) 70 percent of the lower living standard income level, for a similar period; 3. belongs to a household that receives (or has been decided within the 6month period before application for the program to be eligible to receive) food stamps according to the Food Stamp Act of 1977 (7 U.S.C. 2011 et seq.); 4. is a homeless person, as defined in subsections (a) and (c) of section 103 of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302); 5. is a foster child for whom State or local government payments are made; or 6. in cases permitted by rules decided by the

Secretary of Labor, is a person with a disability whose own income meets the requirements of a program described in subparagraph (1) or of subparagraph (2), but who is a member of a family whose income does not meet such requirements.

Mature Worker: An individual age 55 or older.

Occupational Skills Training: Includes both (1) vocational education which is designed to provide individuals with the technical skills and information required to perform a specific job or group of jobs, and (2) on-the-job training.

**ONET:** The Occupational Information Network for use matching the title of an occupation with its 5 or 6-digit occupational code (http://online.onetcenter.org/).

On-the-Job-Training: Training by an employer that is provided to a paid customer while 1. Engaged in productive work in a job that: 2. Provides knowledge or skills essential to the full and adequate performance of job; 3.Provides reimbursement to the employer of up to 50 percent of the wage rate of the customer, for the extraordinary costs of providing the training and the additional supervision related to the training; and 4. Is limited in duration as appropriate to the occupation for which the customer is being trained; taking into account the content of the training, the prior work experience of the customer, and the service strategy of the customer, as appropriate.

**Pre-Apprenticeship:** Services and programs, often including classroom instruction, designed to prepare individuals to enter and succeed in Registered Apprenticeship programs. These programs should have a documented partnership with at least one Registered Apprenticeship program sponsor and together, they expand the customer's career pathway opportunities with industry-based training coupled with classroom instruction.

**Public Assistance:** Federal, State or Local government support provided to families for which eligibility is determined by a needs or income test. Includes TANF, childcare, food stamps (SNAP), housing assistance, work subsidies, and allowances or other cash payments to meet living expenses.

**Registered Apprenticeships:** An employer-driven model that combines on-the-job learning with related classroom instruction that increases an apprentice's skill level and wages and is registered/approved with the US Department of Labor.

**Sector Partnerships:** Brings together employers, at a regional level, from the same industry with the education, training and other community support programs needed to implement solutions and services that ensure the target industry thrives.

**Supplemental Nutrition Assistance Program (SNAP):** Provides supplemental food and nutrition assistance to low income individuals. Replaced Food Stamp program.

**Standing Committee:** A component of a local Workforce Development Board that is chaired by a Board member, includes other community members, and focuses on a specific issues, such as youth or one-stop operations.

**Talent Development:** Developing and guiding customer's skills, knowledge and abilities through understanding, managing and developing their talents in the best possible way; in conjunction with occupational training, classroom training and work-based learning strategies.

**Temporary Assistance to Needy Families (TANF):** Is a federal program providing cash, medical or food assistance for parents and children.

**Trade Adjustment Assistance (TAA):** Trade Adjustment Assistance service and allowances provided for achieving reemployment of adversely affected workers, including TRA, training, and other re-employment services, and job search allowance and relocation allowances.

### **Training Services:**

Training services available at no cost to eligible customers may include, but are not limited to, occupational skills training, on-the-job training, skill upgrading and retraining, cooperative education programs, entrepreneurial training, transitional jobs, incumbent worker training, customized training. Reference: WIOA section 134(c)(3)

**Veteran:** An individual who served in the active military, naval, or air service, and who was discharged or released from such service under conditions other than dishonorable.

**Veteran (Recently separated):** Any veteran who applies for participation under this title within 48 months after the discharge or release from active military, naval, or air service.

**Vocational Rehabilitation:** Is a process/program which enables persons with functional, psychological, developmental, cognitive and emotional impairments or health disabilities to overcome barriers to accessing, maintaining or returning to employment or other useful occupation.

**Wagner-Peyser:** Employment Service programs – Employment Service basic labor exchange and other services funding source.

Welfare and/or Public Assistance Recipient: A person who, during the course of the program year, receives or is a member of a family who receives cash welfare or public assistance payments under a Federal, State, or local welfare program.

WIOA Adult: An individual who is age 18 or older.

WIOA: Is a comprehensive legislation that reaffirms, reforms, and modernizes the public workforce system, bringing together and enhancing several key employment, education, and training programs. WIOA resources, services, and leadership tools for the workforce system to help individuals find and maintain good jobs and improves employer prospects for success in the global marketplace. It ensures that the workforce system operates as a comprehensive, integrated and streamlined system to provide pathways to prosperity for those it serves and continuously improves the quality and performance of its services.

**Work-based Learning:** Experiential learning opportunities that take place within a business or onsite with an employer.

**Workforce Development:** Is an American economic development approach that attempts to enhance a region's economic stability and prosperity by focusing on people rather than businesses. It is essentially a human resources strategy.

**Youth/Young Adults:** Means an individual between ages 14-24 who meets the Title I of WIOA Youth/Young Adult program eligibility.

# 2020-2024 Local Plan Assurances

The following checklist and signed certification must be included in the submitted Local Plan. Check the following boxes to accept the assurances listed below.

Grocope	. crrc ac	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 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.
<b>**</b>	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.
<b>*</b>	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 subrecipient.
	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.

<b>*</b>	31.	duplication of services.  The Local Board will provide reasonable accommodation to qualified individuals with disabilities unless providing the accommodation would cause undue hardship.
**	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
	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.
*	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.

The Local Workforce Development Board for **Frederick County, MD** 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.





Signatures Approving the Revisions to Frederick County's Local WIOA Plan

Docusigned by:  Dessica Fitzwater	2/2/2024	
Jessica Fitzwater	Date	
Frederick County Executive		
Duayne Myus (Han)	01/10/2024	
Dwayne Myers	Date	
Local Workforce Development Board Chair		

Approved by Frederick County Workforce Development Board by vote on March 12, 2021.