

# Guidelines for Developing 2020-2024 Workforce Innovation and Opportunity Act (WIOA) Regional and Local Workforce Plans November 17, 2022

Governor’s Workforce Development Board  
Maryland Department of Labor  
Maryland Department of Human Services  
Maryland State Department of Education  
Maryland Department of Housing and Community Development

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**Guidelines for Developing 2020-2024 Workforce Innovation and Opportunity Act  
(WIOA) Regional and Local Workforce Plans  
November 17, 2022**

## Background

The Workforce Innovation and Opportunity Act (WIOA) is the federal law that governs Maryland's workforce system. WIOA is designed to integrate services to support both businesses and jobseekers through strategic cross sector partnerships. It envisions connecting workforce, education, human services, and economic development entities to ensure strategic leveraging of resources and optimum results. The law addresses the needs of customers through establishing a comprehensive system that provides access to employment, education, training and support services. Through the American Job Centers (AJCs), WIOA works to prepare a trained and competitive workforce to meet the demands of employers and the labor market.

### Maryland's Approach

To establish the high quality network envisioned under WIOA, in 2016, Governor Hogan directed relevant Maryland agencies to jointly develop the State's workforce plan. This marked the first time that Maryland's Department of Labor Division of Workforce Development and Adult Learning (MD Labor DWDAL), the Department of Human Services (DHS), the Maryland State Department of Education Division of Rehabilitation Services (MSDE DORS), the Governor's Workforce Development Board (GWDB), and local workforce partners collaborated to develop the operational components of Maryland's workforce system. The Governor's charge to these stakeholders was to develop a plan that maximized state resources in order to deliver outstanding customer service to the workers and businesses that are vital to Maryland's economic growth and prosperity.

During its first two years of implementation, Maryland successfully launched an integrated workforce network that ensures citizens have access to quality occupational training and employment opportunities. Maryland expanded its WIOA system in 2018 to include new partners and resources to further support the State's jobseekers and businesses. For the first time ever, effective with this State Plan revision, the Department of Housing and Community Development (DHCD)'s Community Services Block Grant program, the MD Labor Division of Unemployment Insurance, and the Senior Community Service Employment Program will be formally added into Maryland's Combined State Workforce Plan. Recognizing that no single entity can exclusively provide *all* services to a customer, this more inclusive approach will diversify services and invest in new, integrated practices that surpass the traditional expectations of a workforce system.

Maryland's workforce system partners are committed to implementing the *Benchmarks of Success for Maryland's Workforce System*,<sup>1</sup> which focus on a shared vision of excellence and 5 strategic goals.

**Maryland's Vision:** Increase the earning capacity of Marylanders by maximizing access to employment, skills and credentialing, life management skills, and supportive services.

### **Five Main Strategic Goals:**

1. Maximize access to employment;
2. Maximize access to/use of skills and credentialing;
3. Maximize access to/use of life management skills;
4. Eliminate barriers to employment; and,
5. Strengthen and enhance the effectiveness and efficiency of Maryland's workforce system.

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<sup>1</sup> The *Benchmarks of Success for Maryland's Workforce System* can be accessed at:  
<http://www.labor.maryland.gov/employment/wioagoalbenchmarks.pdf>.

Each goal has a series of benchmarks that will ultimately be tracked by the State to gauge progress and to better understand our system's success in working towards this shared vision and 5 shared goals. Maryland's workforce system will use the *Benchmarks of Success* as a framework, guiding the shared goals and activities of the WIOA system. The *Benchmarks* initiative allows partners to think systematically about how workforce services are delivered, whether services are reaching priority populations, and where to eliminate existing gaps to build a more prepared, responsive workforce for Maryland's businesses.

## **Process for the Development and Submission of Regional and Local Plans**

Regional and Local Plans, pursuant to WIOA, must align with the State's vision, as set forth in the State Workforce Plan. While Local and Regional Plans are required every four years, at the end of the first two years of the four-year period, the Local Board, in partnership with the chief elected official(s), must review the Plan and submit modified Plans to ensure conformity with the State Plan.

At minimum, Maryland requires that Regional and Local Plans include the provisions in this guidance by the following dates:

### **Important Dates Regarding Regional and Local Planning**

**Nov. 17, 2022** Local Boards receive guidance and timeline from State for WIOA Regional and Local Plans

**Feb. 1, 2023** Regional Plans due to MD Labor

**May 1, 2023** Local Plans due to MD Labor

When submitting Regional and Local Plans, please submit plans electronically **in both** Word (.doc) and Adobe (pdf) format to [DLWDALWIOA-labor@maryland.gov](mailto:DLWDALWIOA-labor@maryland.gov). The submission should include the name, title, email address, mailing address, and phone number of the person we may contact with questions regarding the Plan. **Submissions must also include the prompts within the response document.**

## Regional Plan Requirements

Regions are defined by the State, according to the requirements of WIOA Section 106(a) and 20 CFR 679.210, in order to align workforce development activities and resources with larger regional economic development areas and resources. Regional coordination and plan requirements are defined in WIOA Section 106(c) and 20 CFR 679.510.

Based on a variety of considerations, Maryland has designated the following 5 WIOA regions:

- **Western** - The Western region is comprised of the Western Maryland Local Area. This Local Area is comprised of Maryland's three most western counties: Garrett, Allegany, and Washington.
- **Capital** - The Capital region includes three Local Areas: Prince George's, Montgomery and Frederick. All three are located along the Washington, D.C. corridor.
- **Central** - The Central region is comprised of five Local Areas: Anne Arundel, Mid-Maryland, Baltimore County, Baltimore City, and Susquehanna.
- **Southern** - The Southern region is comprised of the Southern Maryland Local Area. That Local Area is comprised of Calvert, St. Mary's, and Charles Counties.
- **Eastern Shore** - The Eastern Shore region is comprised of two Local Areas: Upper Shore and Lower Shore.

A Regional Plan is a four-year action plan to develop, align and integrate service delivery strategies and resources among the multiple local workforce development areas in a given region. The Regional Plan must be consistent with the vision and goals of the State Plan, and should include the information requested below.

## Section 1 – Regional Analysis

This Section should provide an analysis of regional economic conditions that includes – (A) Existing and emerging in-demand industry sectors and occupations<sup>2</sup> and their employment needs.<sup>3</sup>

- (B) Demographic characteristics of the current workforce, including the educational and literacy levels, with emphasis on youth, adults in transition, and individuals with disabilities. Describe how the region’s demographics are changing and the planning implications for the anticipated workforce of the future.<sup>4</sup>
- (C) Knowledge and skills needed to meet the employment needs of the employers in the region, including employment needs in in-demand industry sectors and occupations.<sup>5</sup>
- (D) Analysis of the workforce in the region, including current labor force employment/ unemployment data,<sup>6</sup> labor market trends, and the educational and skill levels of the workforce in the region,<sup>7</sup> including individuals with barriers to employment.<sup>8</sup>
- (E) Analysis of the workforce development activities (including education and training) in the region, 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 region.

*NOTE: The regional labor market analysis should provide the framework for the development of goals, objectives, and strategies in the region. Plan writers are encouraged to review information on the State’s economy and workforce in the State Plan.*

## Section 2 – Regional Sector Strategies

This Section should –

- (A) Identify which in-demand industry sector(s) or occupation(s) the Local Boards in the region is/are serving and why.<sup>9</sup>
- (B) Describe the current status of regional collaboration in support of the sector/occupation, and identify anticipated next steps and timelines for at least the first two years of plan implementation.

*NOTE: not all efforts to address the needs of in-demand sector(s) or occupations need to be regional. Regions should prioritize those sector(s) or occupation(s) that require a regional approach based on the regional data analysis. Local Boards in a multi-area region may also serve local sectors based on more localized needs.*

<sup>2</sup> Existing and emerging industries and occupations can be determined in a variety of ways (e.g., projections, location quotients). For your convenience, the Labor Market Information (LMI) Team has provided the Growth Industry Tool (GIT) and the Growth Occupation Tool (GOT) available at: <http://www.labor.maryland.gov/lmi/wiagrowthind/got.shtml>.

<sup>3</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: <https://mwejobs.maryland.gov/vosnet/Default.aspx>.

<sup>4</sup> The Maryland Department of Planning (<http://planning.maryland.gov/>) and the U.S. Census Bureau offer a wealth of data pertaining to demographic characteristics (<http://www.census.gov/>).

<sup>5</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>6</sup> Employment and unemployment data is available at: <http://www.labor.maryland.gov/lmi/laus/lauscounties.shtml> and <http://labor.maryland.gov/lmi/uicountyindustry/>.

<sup>7</sup> There are a variety of ways to determine educational and skill levels of the workforce. Real-time LMI is available at: is available at: <https://mwejobs.maryland.gov/vosnet/Default.aspx>. Worker educational attainment by area is available at: <http://onthemap.ces.census.gov/>.

<sup>8</sup> There are a variety of ways to determine barriers to employment. Census data is available from the Maryland Department of Planning. For example, poverty data is available: [http://mdpgis.mdp.state.md.us/census\\_acs/index.html](http://mdpgis.mdp.state.md.us/census_acs/index.html).

<sup>9</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: <http://www.labor.maryland.gov/lmi/wiagrowthind/got.shtml>.

### Section 3 – Regional Service Strategies

This Section should –

- (A) Identify and describe which populations and/or service strategies and/or services will be developed on a regional basis.

*NOTE: There is no expectation that all service strategies in multi-area regions will be regional, or that regions will have robust strategies in place at the start of the planning timeline. This plan provides the baseline. Local Board(s) are expected to make a good faith effort at exploring options to better integrate service delivery as it makes sense over time.*

### Section 4 – Coordination with Regional Economic Development Organizations

This Section should –

- (A) Identify regional economic development services and providers in the region and describe how the Local Board(s) will coordinate services with these services and providers. Describe the current state of coordination with economic development and the anticipated next steps during the four-year plan period.

*NOTE: it is anticipated that workforce regions may have more than one economic development organization, and that Local Boards will continue to work with economic development organizations that are not regional in nature.*

### Section 5 – Coordination of Transportation and/or Other Support Services

This Section should, as part of the regional service delivery strategy –

- (A) Describe whether transportation or other support services need to be coordinated across the region based on the regional analysis, and if so which services and how.

*NOTE: In alignment with WIOA Section 106(c)(1)(F), while not a requirement, should the region wish to coordinate efforts regarding transportation and supportive services, it must be addressed in the regional plan.*

### Section 6 – Regional Cost Arrangements

This Section should, as part of the regional service delivery strategy –

- (A) Describe cost arrangements in the region for costs associated with items 1 through 5 above, which may include the pooling of administrative costs.

*For multi-area regions, options may include: each Local Board manages its costs separately for common goals; coordination of some or all costs among Local Boards in the region; or the creation of a resource pool for some or all regional costs. **Regional cost arrangements are not to be confused with one-stop infrastructure cost sharing MOUs and RSAs. NOTE: This is not a requirement, but should the Local Boards in the region wish to establish regional cost arrangements, it must be included in the regional plan.***

## Section 7 – Regional Performance Negotiation

This Section should, as part of the regional service delivery strategy –

- (A) Single area regions may describe the process used to negotiate performance. Describe how a region consisting of multiple Local Workforce Development Areas will collaboratively negotiate and reach agreement with the Governor on local levels of performance and report on performance accountability measures.

*NOTE: There is no requirement that a region negotiate a single level of performance on any measures.*



## Local Plan Requirements

Section 108 of WIOA requires that each Local Board develop and submit to the Governor a comprehensive Local Plan.

A Local Plan is a four-year action plan<sup>10</sup> to develop, align, and integrate service delivery strategies and resources among the workforce system. The Local Plan should support achievement of the State's vision and goals, as outlined in the State Plan. This is described at WIOA Section 108(a), and the contents of the Local Plan are described at WIOA Section 108(b) and 20 CFR 670.560. The Local Plans must be consistent with the vision and goals of the State Plan, and should include the information requested below.

Local Plan references to local policies should include links to the policies or the documents as attachments. Local Plan references to future actions (e.g. revise/update policies) should include an expected timeline for completion.

### 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>11</sup> and the employment needs of businesses in those industry sectors and occupations.<sup>12</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.

*NOTE: In providing an analysis as outlined in this Section, Local Boards may utilize an existing analysis previously commissioned by the Local Board as long as it addresses the provisions of this Section. Local Boards are encouraged to use the Growth Industry Tool (available on MD Labor's website at: <http://www.labor.maryland.gov/lmi/wiagrowthind/git.shtml>) and the Growth Occupation Tool (available at: <http://www.labor.maryland.gov/lmi/wiagrowthind/got.shtml>) as an aid to examining employment, growth, and employment concentration for the Local Area.*

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<sup>10</sup> Note that several new prompts are included in this guidance.

<sup>11</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: <http://www.labor.maryland.gov/lmi/wiagrowthind/got.shtml>.

<sup>12</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: <https://mwejobs.maryland.gov/vosnet/Default.aspx>.

## 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:

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

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

- (A) An analysis of the knowledge and skills needed to meet the needs of the businesses in the Local Area, including employment needs in in-demand industry sectors and occupations.<sup>13</sup>
- (B) An analysis of the workforce in the Local Area, including current labor force employment (and unemployment) data,<sup>14</sup> and information on labor market trends, and the educational and skill levels of the workforce in the Local Area, including individuals with barriers to employment.<sup>15</sup>

*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.*

<sup>13</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>14</sup> Employment and unemployment data is available at: <http://www.labor.maryland.gov/lmi/laus/lauscounties.shtml> and <http://labor.maryland.gov/lmi/uicountyindustry/>

<sup>15</sup> There are a variety of ways to determine educational and skill levels of the workforce. Real-time LMI is available at: is available at: <https://mwejobs.maryland.gov/vosnet/Default.aspx>. Worker educational attainment by area is available at: <http://onthemap.ces.census.gov/>.

- (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.
  
- (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). This description should include goals relating to the *Benchmarks of Success* and performance accountability measures, based on primary indicators of performance described in Section 116(b)(2)(A) of WIOA, that support Local Area economic growth and economic self-sufficiency.

### 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) Taking into account analyses described in Section 2, a strategy to work with the entities that carry out the core programs to align resources available to the Local Area, to achieve the strategic vision and goals.
- (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.).
- (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).
- (D) A description of the steps taken by the Local Board to engage entities identified in A in the formulation of its Local Plan.
- (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.

**Please be sure to address each bullet in the response.**
- (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.
- (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.

(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.

(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. **Types of supportive services include, but are not limited to:**

- Assistance obtaining a driver's license;
- Transportation assistance;
- Uniforms, tools, and related equipment;
- Child or dependent care;
- Union initiation fees; and,
- Clothing for interviews and job fairs.

(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.

(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.

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

## 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.
- (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: <https://labor.maryland.gov/employment/mpi/mpi10-21.pdf>.*
- (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.
- (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: <https://labor.maryland.gov/employment/mpi/mpi11-21.pdf>.*
- (E) A description of how the Local Board will facilitate access to services provided through the AJC delivery system, including in remote areas, through the use of technology and through other means.
- (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: <https://labor.maryland.gov/employment/mpi/mpi4-21.pdf>.*
- (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).
- (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.

*Note: Priority of service for the WIOA Title I Adult Program must be provided in the following order:*

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

*Federal citations: 38 U.S. Code § 4215 - Priority of service for veterans in Department of Labor job training programs - <https://www.gpo.gov/fdsys/pkg/USCODE-2008-title38/pdf/USCODE-2008-title38-partIII chap42-sec4215.pdf>; A Protocol for Implementing Priority of Service For Veterans and Eligible Spouses: <https://wdr.doleta.gov/directives/attach/TEN/ten2010/ten15-10a1.pdf>; **TEGL 7-20, "Effective Implementation of Priority of Service Provisions for Most in Need Individuals in the***

*Workforce Innovation and Opportunity Act (WIOA) Adult Program,*” dated November 24, 2020.

- (I) A description of how the Local Board will utilize funding to create incumbent worker training opportunities.
- (J) A description of how the Local Board will train and equip staff to provide excellent, WIOA-compliant customer service.

## 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.
- (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>.*
- (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.

*Note: The age range for in-school youth is 14-21, and the age range for out-of-school youth must either align with WIOA (16-24) or should align with Maryland (18-24), but include language about exceptions to Maryland's compulsory education law. DWDAL's policy on the Title I Youth Program can be found here: <https://labor.maryland.gov/employment/mpi/mpi14-21.pdf>.*

- (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.
- (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.
- (F) A description of how the Local Board will utilize Local Adult Funding, based on adult priority groups as specified in the State Plan.
- (G) A description of how the Local Board will utilize Local Dislocated Worker Funding.
- (H) A description of how the Local Board will define “self-sufficiency” for employed Adult and employed Dislocated Worker participants.
- (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.
- (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: <https://labor.maryland.gov/employment/mpi/mpi14-21.pdf>.*
- (K) A description of how the Local Board will interpret and document eligibility criteria for out of school youth “requires additional assistance to complete an educational program or to secure or hold employment” as set forth in the State’s Youth Policy and WIOA Sections 129(a)(1)(B)(iii)(VII) and (a)(1)(C)(iv)(VII). *DWDAL's policy on the Title I Youth Program can be found here: <https://labor.maryland.gov/employment/mpi/mpi14-21.pdf>.*



- (L) A description of the documentation required to demonstrate a “need for 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:
1. *Tutoring, skills training, and dropout prevention;*
  2. *Alternative secondary school services;*
  3. *Paid and unpaid work experiences;*
  4. *Occupational skills training;*
  5. *Leadership development opportunities;*
  6. *Supportive services;*
  7. *Mentoring;*
  8. *Follow-up services;*
  9. *Counseling;*
  10. *Concurrent education and workforce preparation activities;*
  11. *Financial literacy education;*
  12. *Entrepreneurial skills training;*
  13. *Labor Market Information (LMI); and*
  14. *Preparing for Post-Secondary Education and training.*
- (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.
- (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.
- (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.
- (P) Describe the Local Board’s follow-up services policy. This should include follow-up requirements, frequency of contact, and required documentation.

## 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.
- (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:*  
<https://labor.maryland.gov/employment/mpi/mpi10-21.pdf>.
- (C) A description of how the Local Board will ensure that the individual appointed to represent Title II services on the Board will coordinate with all Title II Grant Administrators in the Local Area in a uniform, regular, and consistent manner.
- (D) A description of how adult education services will be provided in the AJC system within the Local Area.
- (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. **If there are no IELCE providers in the Local Area, the response should note how the Area refers jobseekers looking for IELCE services.** *Note: Local Areas should check with all Title II-funded providers in their area; not all adult education providers receive IELCE funds.*

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

*DWDAL's policy on migrant and seasonal farmworker services can be found here:*

<http://www.labor.maryland.gov/employment/mpi/mpi4-18.pdf>.

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

*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 LEA 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: <http://www.labor.maryland.gov/employment/mpi/mpi4-18.pdf>.*

*Optional Template Language: The MD Labor State Labor Exchange Administrator for [Insert Local Area Name Here] 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

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.
- (B) A description of how individuals with disabilities will be served through the AJC system in the Local Area. *MD Labor’s Nondiscrimination Plan can be found here: <http://www.labor.maryland.gov/employment/ndp/>.*

## 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: <http://www.labor.maryland.gov/employment/wioatca.shtml>.

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.).
- (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.

**Please be sure to address each bullet in the response.**

- (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.
- (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.

## 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.*
- 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.
- 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.*

## 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 Agencies are a partner in the local workforce development system, irrespective of whether they spend money on employment and training. A map of Maryland's Community Action Agencies (CAAs) can be found here: <https://www.maryland-cap.org/member-map.aspx>.*
- (B) A description of the implementation and coordination process to enhance the provision of workforce development services for individuals receiving CSBG-supported services 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.

**Please be sure to address each bullet in the response.**

- (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>.*



## 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.

*Optional Template Language: The AJC provides “Priority of Service” to veterans and eligible persons 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 persons 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 person must meet the statutory definition of a “covered person” and also must meet any other statutory eligibility requirement applicable to the program. For all USDOL funded programs, Priority of Service means access to services or resources earlier than others, or if resources are limited, it may mean access to services and resources instead of general service individuals.*

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

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

*In accordance with Maryland’s State Plan, veterans and eligible persons 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 persons who are also included in the groups given statutory priority for WIOA adult formula funds. This means that veterans and eligible persons 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 persons who are not included in WIOA’s priority groups.*
- 4. Last, to non-covered persons outside the groups given priority under WIOA.*

<i>1<sup>st</sup> Priority</i>	<i>Veterans and eligible persons who are also low-income, recipients of public assistance and/or basic skills deficient</i>
<i>2<sup>nd</sup> Priority</i>	<i>Individuals who are not veterans or eligible spouses, are recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient</i>
<i>3<sup>rd</sup> Priority</i>	<i>Veterans and eligible persons who did not meet "first priority" conditions</i>
<i>4<sup>th</sup> Priority</i>	<i>TEGL 10-9 level wording for level 4-page 8 par iv which states “Non-covered persons outside the program-specific mandatory or spending requirement or limitation then receive the fourth level of priority for the program or service.</i>

### **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, or eligible person that they meet the criteria to be assisted by a Disabled Veteran Outreach Program (DVOP) Specialist. If the SBE customer requests to be assisted by a DVOP, they are agreeing to be case managed. Once the SBE veteran or eligible person agrees to be case managed, the AJC staff member will assist the customer in scheduling an appointment with the DVOP.

Note: SBE veterans or eligible persons decide whether or not to be case managed by a DVOP. If an SBE identified veteran or eligible person declines case management, then they are referred back to non-veteran AJC staff for services.

2. If the customer does not require intensive services, they are then referred to Basic Career Services resources, WIOA Title I resources, an AJC Job Service Specialist, or other resource as determined appropriate based on the Personalized Needs Assessment.

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

### **Verifying Veteran Status**

Any individual **self-identifying** as a covered person should be **provided immediate priority** in the delivery of employment and training services. It is neither necessary nor appropriate to require an individual self-identifying as a veteran or eligible person 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 person 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 person 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 this verification is only necessary where a decision is made to commit outside resources to a covered person over another individual.

*For all other purposes, covered persons should be enrolled and provided immediate priority before providing verification as a covered person.*

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

### ***Veterans and Spouses as Dislocated Workers***

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

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

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

*If a Veteran meets the definition of a dislocated worker, then 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 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 Local Board will promote LVER services through social media, job fairs and email blasts based on information provided to the Local Board by the LVER. The Local Board 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:

<https://labor.maryland.gov/employment/mpi/mpi2-22.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](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.

*Optional Template Language: 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.*

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

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

*Optional Template Language: 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.

*Optional Template Language: Per TEGI 19-16 provision of information and assistance regarding filing claims under UI programs, including meaningful assistance to individuals (including individuals with language or other program access barriers) seeking assistance in filing a claim—*

- *Meaningful assistance means providing assistance:*
  - *In the American Job Center(s), using staff who are well trained in UI claims filing activities and on the rights and responsibilities of claimants, and information necessary to file a claim, or*
  - *By phone or via other technology, such as live web chat and video conference, as long as the assistance is provided by appropriately-trained and available staff and within a reasonable time;*
- *Technology-based approaches to providing meaningful assistance must ensure American Job Center customers have access to appropriately trained staff within a reasonable time. The referral of American Job Center customers to the state UI agency's self-service website or public phone line where the individual is placed into a queue with all other claimants is not meaningful assistance.*

*Wagner Peyser staff provide basic career services for individuals seeking reemployment. In the Reemployment Opportunity Workshop (ROW) and Reemployment Services and Eligibility Assessment (RESEA) workshops and during one on one consultations, the most current job search information and referrals to partner programs are provided to UI claimants to reduce barriers to employment and return to work as quickly as possible. Wagner Peyser funded staff, ROW and RESEA workshop facilitators also teach customers how to register and utilize Maryland's job bank, the Maryland Workforce Exchange (MWE), to access resources for career/skills assessments, job search, and Labor Market Information (LMI).*

*Title I staff are invited to participate during ROW and RESEA by providing information on services and opportunities funded under Title I programs. Title I staff also share information with UI claimants related to WIOA-funded training opportunities that will prepare them for in-demand employment opportunities.*

*Wagner Peyser, ROW and RESEA facilitators provide UI claimants with information and basic instruction on how to contact UI and troubleshoot certain claim issues. They remind UI claimants to meet weekly filing requirements in the Beacon system and to continue recording job searches/reemployment activities in the MWE. Staff also help UI claimants resolve UI related issues by contacting UI through kiosks located in the state's network of American Job Centers (AJC's) or referring customer-related UI issues to the UI-Reemployment unit.*

*The Reemployment Program Manage ensures that staff members continue to maintain their program knowledge with UI/Beacon through training provided by UI/BEACON 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.

*Optional Template Language: Local boards lead workforce system staff in working together effectively to ensure UI claimants receive the integrated, customized resources they need to quickly find employment.*

*Wagner Peyser (WP) staff supporting the facilitation of ROW and RESEA workshops assist UI claimants in*

accessing a full range of online and in-person basic career services. UI claimants who have received their first pay and are profiled to be most likely to exhaust UI benefits are invited to attend the RESEA orientation workshop. During the orientation workshop:

- UI claimants are provided with the full range of basic career services as well as an Individual Reemployment Plan (IRP) that refers them to other WP funded services and individualized services funded under Title I as appropriate.
- Each RESEA session is required to include a one-on-one assessment of the claimants' continuing UI eligibility. This assessment typically includes confirming employment status and a review of the claimant's work search activities. Eligibility issues are reported to UI.
- Customized career and labor market information is provided.
- UI claimants are enrolled in the Wagner-Peyser Employment Service; and
- Information and access to other AJC services and resources that support the claimant's return to work are reviewed. For example, Registered Apprenticeship, Jobs for Veterans State Grant, DORS, Trade, Reentry and Business Services to name a few.

Wagner Peyser funded staff are responsible for the majority of the additional services assigned to a successful RESEA claimant after the development of the IRP. These may include, referrals to employment, one on one meetings to discuss resume, interview, networking and other labor exchange activities. In addition Wagner Peyser funds staff make referrals to other partner programs including Title I, II and IV as necessary.

UI claimants who are profiled as least likely to exhaust their UI benefits are referred to the ROW, which typically runs as a 6 hour session.

The topics in the following list are covered in a ROW session:

- Orientation to AJC services
- How to cope with unemployment
- The job application process
- Résumé préparation
- Interview preparation and strategies
- Utilization of Social Media in the job acquisition process
- Networking to find a job
- Salary Negotiation

Title I staff are invited to participate during ROW and RESEA and provide information on services and opportunities funded under Title I programs. Title I staff also share information with UI claimants related to WIOA-funded training opportunities that will prepare them for in-demand employment opportunities.



## 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 subgrantee information, if applicable.

*Optional Template Language (Local Areas opting for this language should select option 1 OR option 2, as is applicable):*

1. *MD Labor DWDAL is the State Grantee for SCSEP. There are no sub-grantees; however, MD Labor employs an Employment Specialist in each Local Area for which the State Grantee is responsible for administering the SCSEP Program. Note: The jurisdictions for which the State grantee is responsible for administering the SCSEP Program are Baltimore City, Western Maryland (Allegany, Garrett, and Washington Counties), Southern Maryland (Calvert, Charles and St. Mary's Counties) and Eastern Maryland (Caroline, Kent, Queen Anne's and Talbot Counties).*
2. *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. *MAC, Inc.  
(Administering service to Dorchester, Somerset, Wicomico and Worcester Counties)*
  - c. *Baltimore County Department of Aging  
(Administering service to Baltimore County)*
  - d. *Prince George's County, Department of Family Services, Services Division  
(Administering service to Prince George's County)*
  - e. *Senior Service America, Inc.  
(Administering service to Anne Arundel, Carroll, Cecil, Harford, and Howard Counties and co-serving with Maryland Department of Labor Baltimore City)*

- (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.

*Optional Template Language (only applicable for Local Areas whose SCSEP programs are administered by MD Labor): SCSEP utilizes the AJC's system by having participants register with the Maryland Workforce Exchange system to track their progress in narrowing their job interest, host agency search, and employment search. The employment specialists use the Maryland Workforce Exchange to track the participants' progress and maintain case notes for each participant.*

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

It is MD Labor’s policy that all persons have equal opportunity and access to services and facilities without regard to race, religion, color, sex (including pregnancy, childbirth and related medical conditions, transgender status, gender identity, and sexual orientation), marital status, genetic information, age, national origin or ancestry (including Limited English Proficiency), disability, veteran status, political affiliation or belief, 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.

This Section should include –

- (A) A designation of the local Equal Opportunity Officer, including their name, location, email, telephone number, and TTY or equivalent.
- (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 response should include a description for both individuals with Limited English Proficiency and individuals with disabilities.**

- (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.
- (D) A description of how the Local Board will ensure meaningful access<sup>16</sup> to all 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

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<sup>16</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: <https://www.eeoc.gov/eeoc/plan/lap.cfm>.

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.

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

(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.

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

*The Americans with Disabilities Act Checklist for Existing Facilities can be found here:*

<http://www.labor.maryland.gov/employment/ndp/nbp9-AADAChecklist.pdf>

(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.

(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.

## Section 17 – Fiscal, Performance, and Other Functions

This Section should include –

- (A) An identification of the entity responsible for the disbursement of grant funds described in section 107(d)(12)(B)(i)(III), as determined by the chief elected official or the Governor under section 107(d)(12)(B)(i).
- (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.
- (C) A description of the competitive process to be used to award the subgrants and contracts in the Local Area for activities carried out under this title, including risk assessment of potential subgrantees and contractors.
- (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.
- (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: <https://labor.maryland.gov/employment/mpi/mpi11-21.pdf>*.
- (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.
- (G) A description of how the AJCs are utilizing the Maryland Workforce Exchange as the integrated, technology enabled intake and case management information system for programs carried out under WIOA and programs carried out by AJC partners.
- (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: <http://www.labor.maryland.gov/employment/mpi/mpi7-19.pdf>*. The monitoring plan shall address the monitoring scope and frequency and shall include the following:
- 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 subgrantee 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.

Please be sure to address each bullet in the response.

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

Please be sure to address each bullet in the response.

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

Please be sure to address each bullet in the response.

(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.

(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.

Please be sure to address each bullet in the response.

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

## 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.

		<b>Assurance</b>
	1.	Consistent with WIOA Section 108(d), for the 2020-2024 Plan, the Local Board has held at least one public comment period of no less than 30 days to obtain input into the development of the Local Plan and to provide the opportunity for comment by representative of business, labor organizations, education, other key stakeholders, and the general public.
	2.	The final Local Plan is available and accessible to the general public.
	3.	The Local Board has established procedures to ensure public access (including people with disabilities) to board meetings and information regarding board activities, such as board membership and minutes.
	4.	The Local Board makes publicly-available any local requirements for the Local Area, such as policies, including policies for the use of WIOA Title I funds.
	5.	The Local Board has established a written policy or procedure that identifies circumstances that might present conflict of interest for any local workforce investment board or entity that they represent, and provides for the resolution of conflicts.
	6.	The Local Board has copies of memoranda of understanding between the Local Board and each American Job Center partner concerning the operation of the American Job Center delivery system in the Local Area, and has provided the State with the latest versions of its memoranda of understanding.
	7.	The Local Board has written policy or procedures that ensure American Job Center operator agreements are reviewed and updated no less than once every three years.
	8.	The Local Board has procurement policies and procedures for selecting One-Stop operators, awarding contracts under WIOA Title I Adult and Dislocated Worker funding provisions, and awarding contracts for Youth service provision under WIOA Title I in accordance with applicable state and local laws, rules, and regulations, provided no conflict exists with WIOA.

	9.	The Local Board has procedures for identifying and determining the eligibility of training providers and their programs to receive WIOA Title I individual training accounts.
	10.	The Local Board has written procedures for resolving grievances and complaints alleging violations of WIOA Title I regulations, grants, or other agreements under WIOA and written policies or procedures for assisting customers who express interest in filing complaints at any point of service, including, at a minimum, a requirement that all partners can identify appropriate staff contacts and refer customers to those contacts.
	11.	The Local Board has established at least one comprehensive, full-service American Job Center and has a written process for the local Chief Elected Official and Local Board to determine that the center conforms to the definition therein.
	12.	All partners in the local workforce and education system described in this plan ensure the physical, programmatic and communications accessibility of facilities, programs, services, technology and materials in the Local Area's American Job Centers for individuals with disabilities.
	13.	The Local Board ensures that outreach is provided to populations and sub populations who can benefit from American Job Center services.
	14.	The Local Board implements universal access to programs and activities to individuals through reasonable recruitment targeting, outreach efforts, assessments, service delivery, partner development, and numeric goals.
	15.	The Local Board complies with the nondiscrimination provisions of Section 188, and assures that Methods of Administration were developed and implemented.
	16.	The Local Board collects and maintains data necessary to show compliance with nondiscrimination provisions of Section 188 of WIOA.
	17.	The Local Board complies with restrictions governing the use of federal funds for political activities, the use of the American Job Center environment for political activities, and the Local Board complies with the applicable certification and disclosure requirements.
	18.	The Local Board ensures that American Job Center staff, along with the Migrant and Seasonal Farmworker program partner agency, will continue to provide services to agricultural employers and Migrant and Seasonal Farmworkers that are demand-driven and consistent with MD Labor policy.



	19.	The Local Board follows confidentiality requirements for wage and education records including, but not limited to, 20 C. F. R. 603, the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended, WIOA, and applicable State laws, Departmental regulations and policies.
	20.	The Local Board has a written policy and procedures to competitively award grants and contracts for WIOA Title I activities (or applicable federal waiver), including a process to be used to procure training services made as exceptions to the Individual Training Account process.
	21.	The Local Board has accounting systems that follow current Generally Accepted Accounting Principles (GAAP) and written fiscal-controls and fund-accounting procedures and ensures such procedures are followed to insure proper disbursement and accounting of WIOA adult, dislocated worker, and youth program and the Wagner-Peyser Act funds.
	22.	The Local Board ensures compliance with the uniform administrative requirements under WIOA through annual, on-site monitoring of each local sub recipient.
	23.	The Local Board has a written debt collection policy and procedures that conforms with state and federal requirements and a process for maintaining a permanent record of all debt collection cases that supports the decisions made and documents the actions taken with respect to debt collection, restoration, or other debt resolution activities.
	24.	The Local Board has a written policy and procedures for ensuring management and inventory of all properties obtained using WIOA funds, including property purchased with JTPA or WIA funds and transferred to WIOA, and that comply with WIOA, and, in the cases of local government, Local Government Property Acquisition policies.
	25.	The Local Board will not use funds received under WIOA to assist, promote, or deter union organizing.
	26.	The Local Board has a written policy and procedures that ensure adequate and correct determinations of eligibility for WIOA-funded basic career services and qualifications for enrollment of adults, dislocated workers, and youth in WIOA funded individualized career services and training services, consistent with state policy on eligibility and priority of service.

27.	The Local Board has a written policy and procedures for awarding Individual Training Accounts to eligible adults, dislocated workers, and youth receiving WIOA Title I training services, including dollar and/or duration limit(s), limits on the number of times an individual may modify an ITA, and how ITAs will be obligated and authorized.
28.	The Local Board has a written policy and procedures that establish internal controls, documentation requirements, and leveraging and coordination of other community resources when providing supportive services and, as applicable, needs-related payments to eligible adult, dislocated workers, and youth enrolled in WIOA Title I programs.
29.	The Local Board has a written policy for priority of service at its American Job Centers and, as applicable, affiliate sites and for local workforce providers that ensures veterans and eligible spouses are identified at the point of entry, made aware of their entitlement to priority of service, and provided information on the array of employment, training and placement services and eligibility requirements for those programs or services.
30.	The Local Board has developed plans and strategies for maximizing coordination of services provided by the State employment service under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) and services provided in the Local Area through the American Job Center delivery system, to improve service delivery and avoid duplication of services.
31.	The Local Board will provide reasonable accommodation to qualified individuals with disabilities unless providing the accommodation would cause undue hardship.

The Local Workforce Development Board for \_\_\_\_\_ 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.

\_\_\_\_\_  
Local Chief Elected Official(s)<sup>17</sup>

\_\_\_\_\_  
Date

\_\_\_\_\_  
Local Workforce Development Board Chair

\_\_\_\_\_  
Date

<sup>17</sup> Additional signature lines should be added to accommodate Local Areas that require more than one local chief elected official signature.