Workforce Innovation and Opportunity Act

Mayor's Office of Employment Development

City of Baltimore

Baltimore Workforce Investment Board

Baltimore City's
Workforce Innovation and Opportunity Act (WIOA)
Local Workforce Plan
July 1, 2016 - June 30, 2020
Revised March 10, 2017

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Baltimore City's
Workforce Innovation and Opportunity Act (WIOA)
Local Workforce Plan
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Prologue:

The Baltimore Workforce Development Board (BWDB) (formally the Baltimore Workforce Investment Board) is pleased to present its Local Plan. The document was prepared to comply with the requirements of the Workforce Innovation and Opportunity Act (WIOA) which specifies that each local system describe its operational policies and procedures. It anticipates offering services to thousands of residents across our city who bring with them skills and abilities and dreams of a better life. It also recognizes that many of our residents face challenges that must be addressed so that the promise of their future can be realized. These challenges include the lack of adult education, limited work experience, a criminal background and the need for child care to name a few.

WIOA provides critical financial resources to our city but the workforce system is bigger than any one funding stream. Though this plan specifies how federal resources will be utilized, the BWDB envisions a comprehensive system in which public agencies, the nonprofit community and the private sector work in true partnership to create a network of service delivery that stimulates career pathways for residents to access good jobs and provides a simplified process for employers to find their skilled workforce. This partnership is easier said than done. A true comprehensive system requires tending and for each party to recognize that the whole (the system) is greater than the sum of its parts (any individual organization). It means that workforce organizations – public and nonprofit - must truly coordinate services to deliver the most qualified resident for the job. It requires complete transparency so that residents and employers have the information to make the best choices to achieve their objective.

WIOA offers critical resources to enhance the local system. It encourages broader partnerships and eliminates some of the required restrictions that dampened local flexibility that makes it more difficult to be responsive to the needs of area residents and employers. The Plan that follows is meant to respond to the specific requirements of the local WIOA plan while laying the groundwork for a more comprehensive system. Despite the formality of the Plan, we recognize that this is, and will always be a work in progress as the economy shifts, the needs of our employers become more evident and the vision of our residents is more apparent. We look forward to further refining the Plan with all partners and stakeholders.

Executive Summary

Baltimore is a diverse and vibrant city. It is the region's hub for the arts, cultural activities, sporting events and "quality of life" amenities that attract young professionals to live and work. It is home to world-class medical institutions and highly ranked colleges and universities. It has the interconnectivity of investment, workforce, infrastructure, proximity to a major port where goods and materials can be transported, and the potential for future business growth and economic revitalization.

Yet, unemployment rates in Baltimore City remains too high at 6.1% (May 2016) https://www.dllr.state.md.us/lmi/laus/ and in some communities, nearly 1 in 3 adults are jobless. Over 20% of the city's adult population lacks a high school diploma and the city is home to a large number of returning citizens. It is within this context, that the Baltimore Workforce Development Board transitions its work under the new legislation and a new local administration.

Appointed by the Mayor, the Board is comprised of volunteers with private sector representatives making up at least 51% of membership. Its mission is to collaborate with key stakeholders including business to build a workforce development system that drives and supports the local economy

The Baltimore City Mayor's Office of Employment Development (MOED) oversees the public workforce system for Baltimore City and works on behalf of the Board to implement a strategic vision in which every City resident maximizes his/her career potential and all employers have the human resources to grow and prosper --- a workforce system that works for Baltimore City.

The Workforce Innovation and Opportunity Act (WIOA), Public Law 128-113, was signed by President Obama on July 22, 2014 after passing Congress with broad bipartisan support. It reauthorizes and amends the Workforce Investment Act (1998) but also makes important workforce system reforms.

WIOA empowers local workforce boards to develop a four-year plan that describes the strategies, programs, and activities to implement the new law and helps residents go to work.

The 2017-2020 Baltimore City Workforce Development Plan serves as a guide, providing strategic direction for its members, its committees and the staff. It advances its mission and works towards its long-term vision through specific efforts in five areas: building the city's future workforce, increasing the city's labor participation rates, building better connections between and among business and its partners, fostering collaboration and engagement between workforce development areas in the region and promoting efficiency of the Baltimore City workforce system.

With consideration of local workforce needs and insightful contributions from partners and stakeholders, MOED has developed an action plan for Program Years 2017-2020. The goals and objectives identified entail collaboration across the full span of the workforce development system and utilize the system's assets and expertise.

Baltimore City Expected Timeframes

Date	Action
April 6, 2016	Maryland Workforce Investment Network Meeting – State Guidance regarding Regional and Local Plans released
May – June 2016	Baltimore City Local Plan Meetings with Title I, II, III, IV, Jobs for Veterans and Temporary Assistance for Needy Families Program held
May 27, 2016	Local Plan discussion with the Baltimore Workforce Executive Committee
June 1, 2016	Local WIOA work groups submit draft plan sections
June 17, 2016	Local Plan presented to the full board for acceptance
July 1, 2016	Approval of state plan by federal agencies; Planning Regions established
August 1 – 30, 2016	Local comment period
August 17, 2016	Mayoral review completed
September 16, 2016	Public comments incorporated into local plan
September 23, 2016	Authorized signatures obtained
September 30, 2016	Local Plan submitted to the Governor's Workforce Development Board (GWDB)
January 1, 2017	Local Plans approved by the state and implemented by the local areas
January 16, 2017	Adult Education competition released by DLLR
March 31, 2017	Regional Plan due to Governor's Workforce Investment Board
June 30, 2017	Regional Plan approved by DLLR
July 1, 2017	Adult Education providers selected by DLLR

Note Regarding Regional Planning

Section 106 of WIOA provides for the identification of Workforce Development Regions. As set forth in the State Plan, Maryland has initially designated all twelve (12) Local Areas as Regions in compliance with the federal Act. However, this initial designation is only until July 1, 2016. At that time, the State expects to re-designate Maryland's WIOA planning regions. As this is a new provision under the federal Act, and no planning regions have been previously designated, Maryland believes that the additional time would allow for greater discussion of this opportunity.

Baltimore City views the identification and engagement of workforce development regions as a vehicle for greater cooperation among Local Areas. Regions allow the workforce system to better address the issues affecting regional economies. Further, a regional approach allows the workforce system to collect and analyze regional labor markets and ensure that services are delivered in a way to meet the needs of businesses and jobseekers. It is Baltimore City's intention to partner with Anne Arundel Workforce Development Corporation ("AAWDC"), Baltimore County Department of Economic and Workforce Development ("BCDEWD"), Mid-Maryland Workforce Development Board ("Mid-Maryland"), and Susquehanna Workforce Network ("SWN").

Local Plan Requirements

Section 1: Strategic Planning –

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

(A) An analysis of the regional economic conditions including existing and emerging in-demand industry sectors and occupations[1]; and the employment needs of businesses in those industry sectors and occupations[2]. The analysis should identify local priority industries based on employer (and WIOA partner) input.

Baltimore City, located in central Maryland bordered by Baltimore, and Anne Arundel Counties, is the largest city in Maryland and is located on the Chesapeake Bay, a major port on the eastern seaboard. It is a city of neighborhoods that make up 55 distinct communities. As of July 2015 the total population was 622,793, with a civilian labor force totaling 300,021. The unemployment rate (seasonally adjusted as of May, 2016) for Baltimore was 6.1%. Between 2010 - 2014, the Per Capita Personal Income was $25,432 (adjusted dollars). In the same period, the Median Household Income (2016 adjusted dollars) is $42,437. Further, forty percent of the Temporary Cash Assistance recipients for the state of Maryland reside in Baltimore City.

Following the recession in 2007, Baltimore City's employment outlook improved with over-the-year job gains each month since April 2010. Between the employment low of February 2010 and February 2016 (most recent verified data from BLS); there was a net increase of 17,600 jobs, while population has remained relatively unchanged. In that term, large employers like Amazon and Horseshoe Casino began operations. New major development projects were approved, like Harbor Point. There was renewed commitment to hiring Baltimoreans through regional hiring partnerships like Hopkins Local/BLocal and policy changes like the Local Hiring Law passed.

The Baltimore Workforce Development Board (BWDB) recognizes that the labor market is regional and that substantial opportunity for employment lies both inside and outside city boundaries. In the 2000's, the previously governing body, the Baltimore Workforce Investment Board (BWIB) established eight Target Industries for workforce development: 1) Health Care and Social Assistance, 2) Bioscience, 3) Business Services, 4) Computer, Internet, and Software Related Data Services, 5) Construction, 6) Hospitality and Tourism, 7) Port and Port-Related Services, and 8) Sustainable Energy and Environmentally-driven Services.

Concomitantly during the selection of these sectors, DLLR created and maintained 13 industry clusters that closely map with the 6 main BWDB sectors and has one cluster that encapsulates Port

and Port-Related Services. Much analysis by the state and outside groups (specifically the Opportunity Collaborative's 2013 Baltimore Regional Talent Development Pipeline Study, a follow-up to the BWIB's 2010 analysis) was completed on these specific industry clusters. The study examined DLLR's 13 industry clusters and identified demand and potential for developing career pathways for 6 of these sectors: Healthcare, Construction, Information Technology, Transportation and Logistics, Business Services, and Manufacturing. These align closely with 4 of MOED's Target Industries and encapsulate Port and Port-Related Occupations via Transportation and Logistics. The only exceptions are Bioscience and Hospitality and Tourism. The former is not as viable a career pathway, since most jobs require a Bachelor's degree and mid-skill jobs in this sector are typically for supervisor, manager, or sales professionals that need moderate to longer-term on the job training. Hospitality and Tourism weren't considered priorities, because, while job opportunities were expanding in the industry, most careers are low wage and provide little opportunity for promotion or growth. The report provided the following insight into each targeted sector:

Sector	Total Hiring Demand 2012 - 2020	Percent of Jobs that Require Less than Bachelor's Degree	Strong Occupational Targets for Career Pathways
Business Services	46,787	62%	1. Accounting and human resource occupations including tax preparers and HR assistants, 2. Environmental occupations including hazardous materials removal workers and environmental technicians, and 3. Engineering technicians and drafting occupations
Construction	17,254	95%	1. Electricians 2. Plumbers, Pipefitters, and Steamfitters 3. Carpenters 4. Operating Engineers and Other Construction Equipment Operators 5. Highway Maintenance Workers 6. Brickmasons and Blockmasons 7. Glaziers 8. Elevator Installers and Repairers 9. Heating, Air Conditioning, and Refrigeration Mechanics and Installers
Healthcare	49,374	78%	1. Surgical Technicians 2. Radiologic Technicians and Technologies 3. Licensed Practical and Licensed Vocational Nurses 4. Emergency Medical Technicians and Paramedics 5. Respiratory Therapists

Information Technology	12,458	43%	1. Computer Support Specialists 2. Computer System Analysts 3. Network and Computer 4. System Administrators Information Security Analysts, Web Developers, and Computer Network Architects
Manufacturing	11,889	81%	None specified
Transportation & Warehousing	10,093	94%	1. Industrial Truck and Tractor Operators (e.g. forklift operators and other equipment operators) 2. Heavy and Tractor-Trailer Truck Drivers 3. Cargo and Freight Agents 4. Dispatchers 5. Bus and Truck Mechanics and Diesel Engine Specialists

Table 1: Selected Data from Talent Development Pipeline Study

(B) An analysis of the knowledge and skills needed to meet the employment needs of the businesses in the Local Area, including employment needs in in-demand industry sectors and occupations[3]

Supporting the concept that a demand-driven workforce significantly promotes an area's long-term growth potential, Baltimore's Board recognizes that local business must guide the development of initiatives and provide the specifications for re-alignment of local educational opportunities for in-demand jobs.

Listed below are the most popular certifications based on employer advertising in Baltimore City.

Advertised Certification Group	Job Opening Match Count
Certification in Cardiopulmonary Resuscitation (CPR)	1,425
Basic Life Support (BLS) Certification	1,264
Commercial Driver's License (CDL)	873
Advanced Cardiac Life Support Certification (ACLS)	825
Certified Nursing Assistant (CNA)	324
Certified Public Accountant (CPA)	300
Emergency Medical Technician (EMT)	131
National Board for Respiratory Care	126
Pediatric Advanced Life Support (PALS)	126
Licensed Clinical Social Worker (LCSW)	122
Electronics Technicians Association (ETA) International Certification	117
National Board for Certification in Occupational Therapy	104
Certified Information Systems Security Professional (CISSP)	93
Certified Medical Assistant	86
Registered Respiratory Therapist	84

Information Technology Infrastructure Library Certification (ITIL)	51
Cisco Certified Network Associate (CCNA)	50
A+ Certification	46
Licensed Life Insurance Agent	38
Registered Medical Assistant	35
Cisco Certified Network Professional (CCNP)	33
Acute Care Nurse Practitioner	32
Registered Health Information Technician (RHIT)	30
Security+ Certification	30
Senior Professional in Human Resources (SPHR)	30
Certified Professional Coder	29
Information Systems Audit and Control Association Certification	28
First Aid Certification	28
Project Management Professional (PMP)	28
Physician Office Managers Association of America (POMAA) Certification	27
Family Nurse Practitioner	24
CWNP Enterprise Wi-Fi Career Certification	24
GIAC IT Security Administration Certification	23
Human Resource Certification Institute	22
Certified Registered Nurse Anesthetist (CRNA)	20

Table 2: Top certifications Advertised in Baltimore City, all with at least 20 openings; Source: MWE, 2016

Further, an analysis of the skills listed in job postings for the strong occupation targets listed in Table 3 found the following skills unique to each industry. This provides insight into the skills businesses seek in their workforce.

IT	Healthcare	Construction	Port-Related	Business Services
System design	Skilled nursing care	Repairing wire systems	Operating a forklift	3d experience
Business planning	Diagnostic testing	Repair pipes	Mechanical repairs	
Systems analysis	Educate patients	Opens clogged drains		
Variance analysis	Discharge planning	Assemble parts		
Strategic thinking	Administering medications	General maintenance		
Video codecs	Regulatory compliance			
Project management experience	Aseptic technique			
Financial analysis	Direct nursing care			

Project planning	Change dressings
Budget development	Communicates patient condition
Application design	Document nursing encounters
Application development	Venipuncture
Installs patches	Administer medications
Prepare security reports	Implement treatment plans
Provide technical expertise	Cardiac catheterization
Database development	Advanced cardiac life support
Site troubleshooting	Word processing
Requirements gathering	Educates patients
Troubleshoot hardware	Communicate with patients
Financial reporting	Crisis intervention
Troubleshoots network performance	Medication administration
	Personal integrity
	Provides care to patients
	Supervise inmates

Table 3: Skills unique to high-growth occupations in target industry clusters based on MWE job postings for businesses in Baltimore City. Green represents skills that are very common in job postings and yellow represents skills that are fairly common in job postings. Data was retrieved from MWE on 6/1/1.

An analysis of all job postings through the states workforce system database, Maryland Workforce Exchange (MWE) finds the following job skills are desired by all employers. These track closely with common job postings for in-demand industries as well.

Rank	Job Skill
1	Customer service
2	Problem solving
3	Interpersonal skills
4	Customer Service Skills
5	Time management
6	Flexibility
7	Decision making
8	Business development
9	Critical thinking
10	Mentoring

An analysis of jobs projections data for Baltimore City using the Bureau of Labor Statistics 'Education and training assignments by detailed occupation' table found the portion of future jobs in Baltimore City that fit certain education requirements. As shown, the share of jobs that require more than a high school diploma will increase from 39.3% to 40.2%. While occupations with minimum education requirements fitting all levels will see job growth, there will be a large increase in incumbent workers in jobs requiring a high school diploma or less, with those jobs representing 88% of occupations that will see a decline in employment.

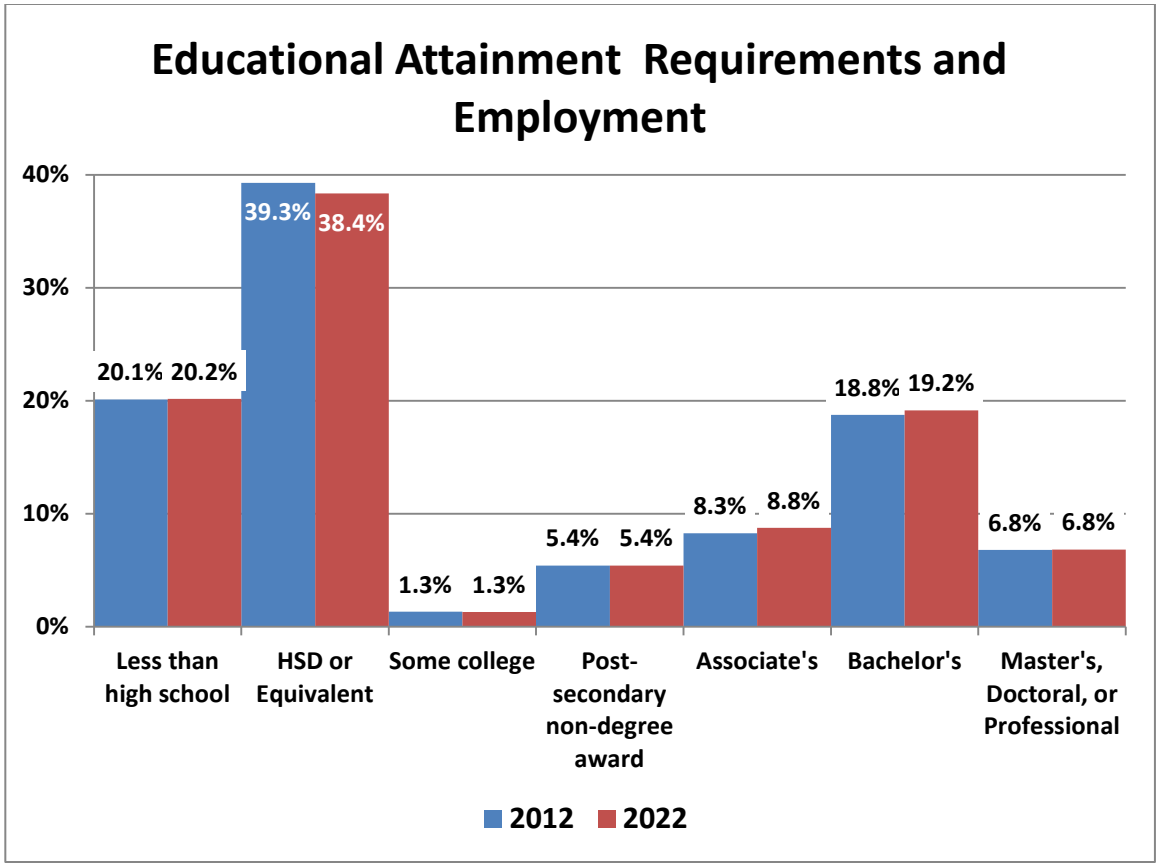


Chart 4: Estimates the portion of education required for jobs available in Baltimore City.

Education Requirements	Job Gains Between 2012 - 2022	Occupations Losing Jobs from 2012- 2022	Occupations Gaining Jobs from 2012-2022
Less than high school	4025	-363	4388
High school diploma or equivalent	4767	-1417	6184
Some college, no degree	237	-3	240
Postsecondary non-degree award	1065	-117	1182
Associate's degree	3081	-16	3097
Bachelor's degree	4878	-54	4932
Master's degree	707	0	707
Doctoral or professional degree	738	-53	791

Table 5: Gains and losses of jobs with specific education requirements for Baltimore City.

(C) An analysis of the workforce in the Local Area, including current labor force employment (and unemployment) data[4], and information on labor market trends, and the educational and skill levels of the workforce in the Local Area[5], including individuals with barriers to employment[6]

The Population Estimates Program of the U.S. Census Bureau estimates that there were 622,793 residents of Baltimore City in July 2015. The median age of Baltimore City residents remained comparatively the same (34.0) as to the last plan period. Black / African Americans accounted for 63.13% of the city's population, while Whites accounted for 31.62%, Asian or Native Hawaiians and Other Pacific Islanders were 2.79%, American Indians and Alaska Natives were 0.45%, and those identifying as two or more races were 2.02% of the city's population. Independent of race, 4.7% of Baltimore City residents identified themselves as being Hispanic.

Baltimore City's labor market hasn't entirely rebounded from the economic downturn. Baltimore City's unemployment rate ranged from 8.7% to 7.0% in 2015, with an annual average of 7.7%. In May 2016, the unemployment rate was 6.0%. The number of weekly new employment claims in May of 2016 was 193 higher than it was in corresponding month in 2015. Baltimore City's unemployment rate was 1.5 percentage points higher than the state of Maryland Seasonally Adjusted Local Area Unemployment Statistics (LAUS) provided by the Maryland State Department of Labor, Licensing and Regulation (4.5%) in May 2016.

Current employment statistics show that average non-farm employment in Baltimore increased by 2.2% from 2012 – 2015, compared to a national average of 5.7% and a metropolitan regional average of 3.8%. Between 2012 and 2015, employment in government jobs declined by 4.2%, while private sector saw employment gains of 4.2%. Since 2012, manufacturing has declined slightly, with employment decreasing by 1.4%, while service-producing industries increased employment by 4.6%, strongly spurred on by gains in professional & business services (8.8%) and leisure & hospitality (13%). The largest decreases in this period were seen by the manufacturing, other services, and government.

Within the 12 month period between the 3rd quarter of 2014 and the corresponding quarter of 2015, Baltimore City gained over 3,006 jobs, which is a 0.9% growth. This was assisted by a gain of 2,738 (6.9% growth) jobs in Trade, Transportation, and Utilities, 1,045 (1.1% growth) jobs in Education and Health Services, and 653 (18.6% growth) in the Information sector. The largest losses were in the Professional and Business Services sector with 2,008 jobs lost (4.5% decline) and Manufacturing with 742 jobs lost (6.5% decline). In the same 12 month period, Maryland gained 35,389 jobs representing a 1.4% growth.

According to the 2015 American Community Survey (5 year estimates), more than four fifths (80.9%) of the population aged 25 years or older in Baltimore City had at least a high school diploma or an equivalent, and slightly more than one quarter (27.7%) had at least a bachelor's degree. Data is broken out by race below, showing significant disparities between black and white populations in attainment of Bachelor Degree's.

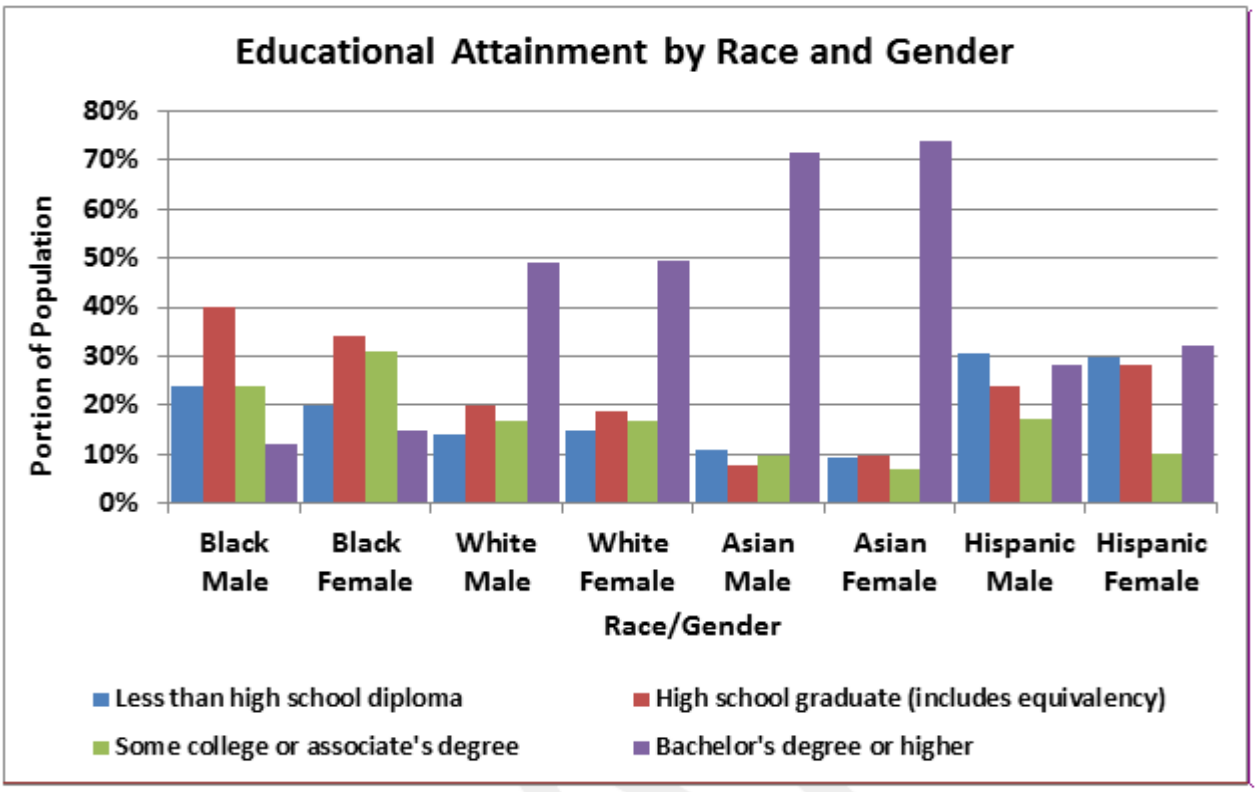


Chart 6: Educational attainment by race and gender for Baltimore City, based on American Community Survey 2015, 5-year estimates

Research by the Opportunity Collaborative[1] suggests that "over half (53%) of new jobs that are expected to be created between 2012 and 2020 will have minimum education requirements that are beyond a high school diploma and virtually all of the jobs that don't require at least some college education have average wages that are less than a living wage." In the case of Baltimore, the median 2014 earnings of an individual with a high school diploma (HSD) was $28,970, while an individual with a Bachelor's degree earned a median of $48,942. Regardless of diplomas and degrees, a significant proportion of job seekers report other educational barriers to employment including low math skills (30%), difficulty with basic computer skills (28%), and literacy problems (14%).

Based on research from the University of Michigan Transportation Research Institute, as of 2012 31.2% of households in Baltimore did not have a vehicle, a number that grew by 1.9% from 2007.[2] About a quarter of job seekers in the Baltimore region report lacking a driver's license.[1] These facts, combined with data that indicates that 11% of the jobs in the Baltimore Metropolitan Region can be accessed by a typical resident in 60 minutes through public transit, means that many Baltimoreans face significant barriers to accessing jobs. Even for those with cars, the number of jobs accessible by car within 20 minutes declined by 17.8% from 1990 – 2010.[3]

[1] Available at http://www.opportunitycollaborative.org/assets/Barriers_Study_Final_052714.pdf?18cd4b
[2] Sivak, M. (2014). Has motorization in the U.S. peaked? University of Michigan Transportation Research Institute, Ann Arbor, Michigan.
[3] 2015 Transportation Report Card, Central Maryland Transportation Alliance. Accessible at http://www.cmtalliance.org/uploads/file/reports/Transportation%20Report%20Card.pdf

As the chart below displays, unemployment is especially high for young populations ages 20-22, with rates of 16% for people ages 20-21 and 15% for people ages 22-24. Additionally, it is clear that among those who are disabled, those with cognitive and hearing difficulty have the highest rates of unemployment among the population as a whole with 12% and 11% respectively; however, among those still in the labor force, 41% of those with a cognitive disability and 33% of those with independent living difficulty are presently unemployed and seeking work.

While exact numbers are not available, Baltimore has a proportionally significant population with a criminal background compared to surrounding counties. Somewhere between 8,000 and 10,000 people return to Baltimore each year from prison and about 40% of those individuals will return to prison within 3 years of leaving. About one-third of those arrested and convicted did not have a job and many of these individuals leaving prison face significant barrier to employment as they legally and socially barred from certain professions and workplaces. Studies show that recidivism is strongly linked with employment.[4]

On any given night, about 3,000 people in Baltimore will be experiencing homelessness, totaling 30,000 each year. According to The Journey Home, the majority of these individuals were adults, with 9% of individuals being in a group of at least one child and adult.[5] Lack of consistent housing alone complicates the employment process; however, the multitude of employment barriers linked to homelessness, including physical and mental health issues, criminal background issues, lack of diplomas or post-secondary education, and lack of reliable transportation, make it especially important that comprehensive supports are provided for individuals experiencing homelessness.

In Maryland, the number of youth in foster care has dropped significantly from 7,047 to 4,304 from 2009 to 2013. The rate of emancipation has dropped from 26% to 18% for those exiting foster care in MD, with 462 youth aging out of foster care in 2013. A study in 2011, suggests about 20% of youth who age out of foster care did not earn a high school diploma by age 26, compared to 6% in the general population. Even more striking, only 4% of those who age out of foster care receive a 4-year college degree, compared to 36% in the general population.[6] Studies of foster youth in North Carolina show foster youth are less likely to be connected to the labor market by age 24 than other youth, even compared to demographically similar low-income youth.[7]

[4] May 03, 2012. Don't leave ex-offenders out of Baltimore's 'next economy.' Baltimore Sun

[5] July 15, 2015. Baltimore City: 2015 Point-in-Time & Housing Inventory Count. The Journey Home. Accessible at http://www.journeyhomebaltimore.org/wp-content/uploads/2016/02/2015-PIT-HIC-Results-Webinar.pdf

[6] Courtney, M. E., Dworsky, A., Brown, A., Cary, C., Love, K., & Vorhies, V. (2011) . Midwest Evaluation of the Adult Functioning of Former Foster Youth. Chicago, Illinois: University of Chicago Chapin Hall.

[7] Macomber J., Cuccaro-Alamin S., Duncan D., Kuehn D., McDaniel M., Vericker T., Pergamit M., Needell B., Kum H., Stewart J., Lee C., Barth R. (2008). Coming of age: Employment outcomes for youth who age out of foster care through their middle twenties. Washington, D.C: Urban Institute.

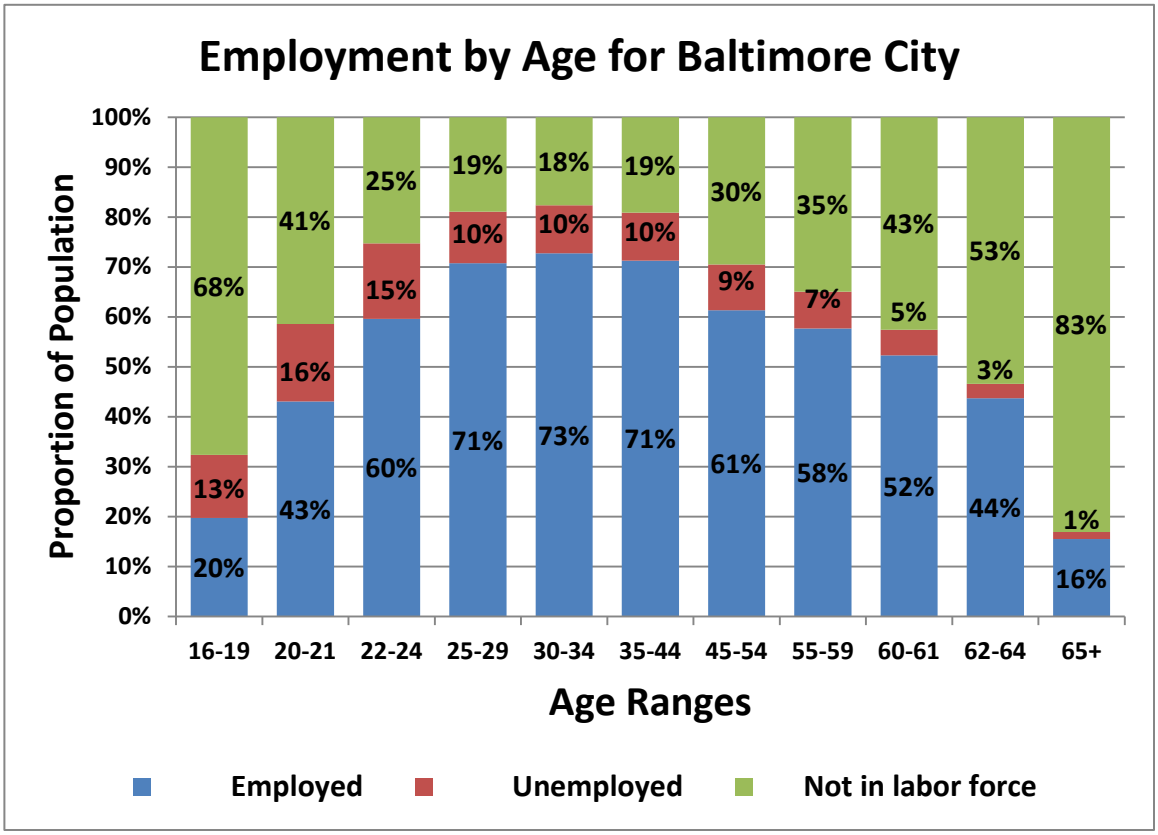
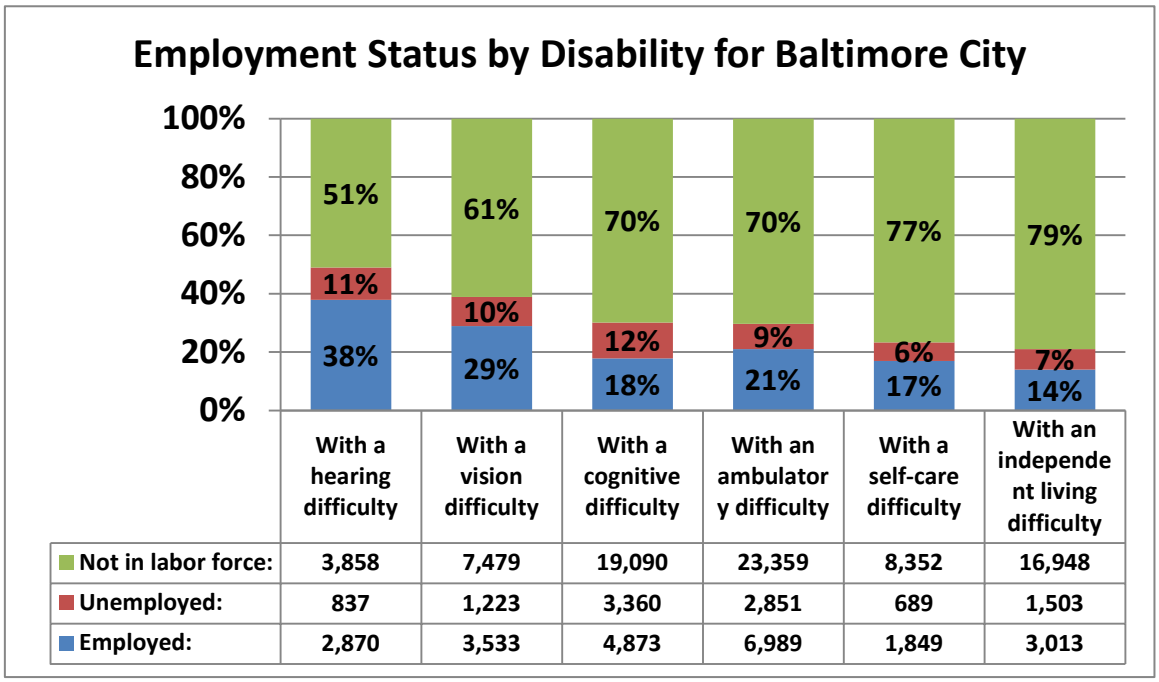


Chart 7: Employment status by age range, Census 2010-2014 5-year American Community Survey



	With a hearing difficulty	With a vision difficulty	With a cognitive difficulty	With an ambulatory difficulty	With a self-care difficulty	With an independent living difficulty
Not in labor force:	3,858	7,479	19,090	23,359	8,352	16,948
Unemployed:	837	1,223	3,360	2,851	689	1,503
Employed:	2,870	3,533	4,873	6,989	1,849	3,013

Chart 8: Employment Status by disability status, Census 2011-2013 3-Year American Community Survey

Based on 2014 Census 5-Year Estimates, unemployment rates among the Black or African Americans (18.5%) and American Indian and Alaskan Native (19.4%) are significantly higher than Whites (7.1%) and Asians (4.8%). Among the Hispanic and Latino population unemployment rates are 9.7%, which is slightly higher than 7.0% for non-Hispanic/Latino Whites. Unemployment is slightly higher among men (14.2%) than women (12.4%), but this trend reverses for women with children under 6 years old (19.4%).

While comprehensive statistics are not available to demonstrate this, many of these barriers occur concomitantly, requiring individuals to address multiple barriers simultaneously in order to attain and retain meaningful employment. For African Americans and for other people of color structural racism is an additional barrier that is embedded in all aspects of employment doorways and advancement. This same structural impediment impacts the daily life of African Americans sometimes requiring behavioral adaptation for success in the workplace. These are some examples of structural racism and their impact:

- **Targeted enforcement of communities of color**: A 2013 study by the ACLU[1] showed differential enforcement of drug laws, causing the marijuana possession arrest rate for the black population in Baltimore to be 5.6 times that of whites between 2001 – 2010.
- **"Unconscious bias":** In many cases, studies show that employers are less likely to hire and promote black employees compared to white employees, due to unconscious biases and perceptions of African Americans and the roles they play in the workplace. One study[2] found that, when applying to a job opening, a white applicant with a criminal record was more likely to receive a callback than a black applicant without one. These unconscious biases likely manifest themselves in opportunities all along an individual's career pathway (from education, to training, hiring, and promotion), consequently multiplying the disparities that come with them.
- **Lack of adequate mentoring and networking:** While a 2001 study[3] showed that black professionals who report having informal mentors at work have faster salary growth than those without, a disproportionate lack of professional connections and mentor supports in the workplace make it more difficult for black professionals to enter and rise in the workplace.

While the Civil Rights Act of 1964 prohibited explicit discrimination from employers to employees based on race half a century ago, the reality is that race is still a strong determinate of success in the workplace. Even if explicit or unconscious racial bias from employers was not an issue, a race-blind approach to workforce development would still yield disparities in outcomes between whites and people of color, because the long history and present operations of structural racism have given whites a head start and a less onerous journey on the pathway to career success. Consequently, individuals and organizations serious about making the employment gap between races contract, have to adopt a conscious anti-racist approach to workforce development.

[1] The Maryland War on Marijuana in Black and White, ACLU
[2] The Mark of a Criminal Record, American Journal of Sociology (Pager, Volume 108 Number 5 (March 2003): pg. 937).
[3] Price M. Cobbs and Judith L. Turnock, *Cracking the Corporate Code: The Revealing Success Stories of 32 African American Executives* (2003).

As the State of Maryland has committed to serving the following target populations, MOED will commit to serve the following groups:

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

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

[1] 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: https://www.dllr.state.md.us/lmi/wiagrowthind/.

[2] 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.

[3] 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.

[4] Employment and unemployment data is available at: https://www.dllr.state.md.us/lmi/laus/lauscounties.shtml.

[5] 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/.

[6] 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.

The following two tables are a 1) list of all colleges and universities and 2) occupational training providers in the Baltimore area, taken from the Opportunity Collaborative's Talent Development Pipeline Report:

Colleges and Universities - Baltimore City	
Baltimore City Community College	Ner Israel Rabbinical College
Binah Institute of Advanced Judaic Studies for Women	Notre Dame of Maryland University
Community College of Baltimore County	St. Mary's Seminary and University
Coppin State University	Talmudical Academy of Baltimore
Goucher College	TESST College of Technology (Baltimore Campus)
Johns Hopkins University	University of Baltimore
Loyola University Maryland	University of Maryland, Baltimore
Maryland Institute College of Art	University of Maryland, Baltimore County
Morgan State University	Women's Institute of Torah Seminary

Table 9: Colleges in Baltimore City, from MHEC-approved list

Occupational Training Providers - Baltimore City	
All-State Career	GlobalTech Bilingual Institute
All-State Career Center	Goodwill Industries of the Chesapeake, Inc
America Works of Maryland, Inc.	GROUP Ministries Baltimore, CDC
Avara's Academy of Hair Design	Health Focus, Inc.
Baltimore City Community College	Holistic Massage Training Institute
Baltimore City Joint Apprenticeship Program	International Academy of Hair Design & Technology
Baltimore Educational Enrichment	IT Works Learning Center - Manor Care
Baltimore School of Dog Grooming	IT Works Learning Center, Inc.
Baltimore Studio of Hair Design	Job Opportunities Task Force
BEAT - Beauty Expert Artistry Training	Johns Hopkins Hospital Schools of Medical Imaging (The)
BioTechnical Institute of Maryland, Inc	Keller Professional Services, Inc.
Business Interface, LLC	LVI Power, LLC
Caroline Center	Maryland Center for Arts & Technology, Inc.
Center for Urban Families	Mid-Atlantic Carpenters' Training Centers - Baltimore
Civic Works, Inc.	Moveable Feast
Digit All Systems, Inc.	St. Vincent de Paul of Baltimore, Inc./St. Ambrose Center.
GBMC School of Radiography	Urban Alliance

Table 10: Occupational training providers in the Baltimore region, taken from Opportunity Collaborative, Train Baltimore website, and MHEC approved list

The following two tables are 1) List of current One Baltimore for Jobs Training Providers and 2) Apprenticeship Opportunities in and around Baltimore City.

One Baltimore for Jobs Occupational Training Providers - Baltimore City	
BTI	Humanim
Bon Secours	Jane Adams Resource Center (JARC)
Caroline Center	Job Opportunities Taskforce/ Jump Start
Catholic Charities	Maryland New Directions
City Life	New Pathways
Civic Works	Vehicles for Change

Apprenticeship Opportunities	
Baltimore Electrical Joint Apprenticeship & Training Center	Baltimore Ironworkers Joint Apprenticeship Committee
Baltimore Operating Engineers Joint Apprenticeship Committee	Baltimore Operating Engineers Joint Apprenticeship Committee
Baltimore Sheet Metal Workers Joint Apprenticeship Committee	Elevators Constructors Joint Apprenticeship Committee
Labors Joint Apprenticeship Committee	Plumbers & Steamfitters Joint Apprenticeship Committee

Based on the report, the following describes the capacity of these programs to supply graduates for future hiring demand in mid-skill jobs[8]:

- **Biosciences –** There will be a hiring demand of approximately 6,000 bioscience jobs that require less than a Bachelor's degree between 2012 and 2020. With a current output of 800 graduates a year, these programs provide a sufficient supply to satisfy new demand for workers in the bioscience sector.
- **Business Services –** There will be an approximate hiring demand of 26,800 business services jobs that require less than a Bachelor's degree between 2012 and 2020. With a current output of 3,000 graduates a year, these programs provide a sufficient supply to satisfy new demand for workers in the business services sector.
- **Construction –** There will be an approximate hiring demand of 11,000 construction jobs that require some level of on-the-job or apprenticeship training between 2012 and 2020. Since the construction industry is not adequately described through typical educational statistics, given that apprenticeships are the main suppliers of trained construction workers, it is hard to predict whether

[8] The report did not distinguish local training programs that focus on two industry sectors identified by the Board- Port and Port-related Services and Sustainable Energy and Environmentally-Driven Services.

supply will meet demand; however, there were about 1,100 graduates from 65 educational programs in construction in the region and there are several Career Pathways initiatives, including the Maryland Center for Construction Education and Innovation at Towson and the MD DLLR/DOT BuildUp Program.

- **Healthcare –** There will be an approximate hiring demand of 38,000 healthcare jobs that require less than a Bachelor's degree between 2012 and 2020. With a current output of 6,000 graduates a year, these programs provide a sufficient supply to satisfy new demand for workers in the healthcare sector.
- **Hospitality and Tourism** – Since over 97% of the 40,000 job openings expected between 2012 and 2020 will only require a high school diploma or lower, only about 1,000 jobs will require workers with any postsecondary education. While this sector does not require post-secondary credentials, there will be about 5,000 workers trained through these programs from 2012 to 2020. This may provide opportunities to up-skill the labor force in areas related to customer service, food safety, and public health.
- **Information Technology –** Demand in the IT sector is greatest for individuals with a high school diploma or a Bachelor's degree, giving estimated annual online job vacancies of12, 684 and 9,623 respectively. With only 60 graduates from non-college/university affiliated training programs, there may be a vacuum for trainees needed to satisfy job demand for low-skilled positions in the IT field.

MOED in partnership with the BWDB have identified the following training strategies in addition to Individual Training Accounts, Customized Training, On-the-Job Training and Incumbent Worker methods:

Training Strategies

The Opportunity Collaborative's Barriers to Employment Opportunities in the Baltimore Region Study (June, 2014) highlights the many complicated reasons Baltimore City residents have difficulty accessing careers with family supporting wages. It also points out that the majority of traditional education options are ill-equipped to address the multiple barriers residents face in gaining skills and credentials that lead to better paying jobs. MOED is committed to utilizing training strategies that consider the needs of its trainees. The agency utilizes a sector-based workforce strategy that includes basic skills preparation, and barrier removal strategies that meet job seekers where they are and improve their ability to succeed. Below are examples of promising practices:

Career Pathway Models:

- **Integrated Basic Education Skills and Training**
  Baltimore City was one of nine workforce investment areas that participated in a four year pilot project incorporating basic education skills with technical training in the health, warehouse and logistics, and manufacturing sectors. This model combines basic education with job skills training focused on specific occupations or sectors. This reduces the amount of time spent acquiring in-demand skills; supports career navigation and coaching that helps mitigate the impact of barriers and focuses students on the end goal of preparing for and acquiring jobs using their newly honed skills.

- **One Baltimore for Jobs (1B4J)**
  Baltimore City was awarded a youth demonstration grant from the Department of Labor as a result of the civil unrest that occurred in the city in April 2015. The 1B4J model couples occupational skills training in the growth sectors identified above, with adult education and supportive services in areas that include legal, mental health, and child support mitigation. It is

a model that builds on the existing workforce development system and aims to demonstrate that a model that combines hard-skills training with more intensive support can not only result in strong employment outcomes but other benefits for residents and their communities.

Sector Strategies

- **Bridge to Careers (B2C)**
  B2C is a promising practice that was initiated in the Northwest Career Center (NWCC) One-Stop Career Center and is focused on returning citizens who are unemployed, lack essential and occupational skills, are unfamiliar with labor market conditions and opportunities and have significant barriers to employment. B2C provides intensive case management services to a cohort of individuals in a four-phased process that involves a comprehensive orientation to specific industries, courses in computer literacy, academic enhancement and employment readiness, referrals to occupational skills training and connection to employment and post placement services. B2C prepares low skilled job seekers for career pathways in select high growth industries including, but not limited to, construction trades, manufacturing, transportation and logistics/warehousing.

- **Apprenticeship**
  Over the next four years, the BWDB and its Business Engagement Committee intends to convene key business stakeholders and education providers to explore new apprenticeship models in Energy, Information Technology and other emerging occupations as the demands are identified. The board will also seek to identify platforms to promote existing apprenticeship programs to attract the future workforce.

Strengths and Weaknesses

Business growth in the region creates employment opportunities in industries that provide a living wage and do not require a four-year degree. The Baltimore Talent Pipeline Study estimates that 43% or more of new jobs created in the six industries projected for growth in the region (Health Care, Business Services, Construction, Information Technology, Manufacturing and Transportation/Warehousing) will require less than a bachelor's degree. However, these opportunities require a workforce that has specific occupational skills. Though Baltimore has approximately 42 certificate and eight apprenticeship programs that will train jobseekers for in-demand careers in the categories listed above – 82% (41) of those programs focus on only three of the six industries. Employers in the Business Services, Manufacturing and Transportation/Logistics sectors have few options for recruiting skilled candidates. At the same time, to successfully participate in occupational skills training, jobseekers must possess certain basic skills (i.e. math and reading). While 15% of the adult population (25 and up) does not have a high school diploma, that number is even higher for African Americans and Hispanics whose unemployment rates are the highest in the city (19% and 10% respectively). Approximately 25% of African Americans and Hispanics do not have a high school diploma. Strong adult basic education (ABE) programs are therefore critical to bridging the basic skills gap and helping these job seekers access training. Baltimore City has several ABE providers that will need to coordinate their services with skills training providers in order to support job seekers to overcome this barrier.

Baltimore City (along with the State and Federal Governments) is also committed to serving residents with significant challenges to employment such as transportation and limited education.

Recent data suggests that unemployed residents in the city also tend to be younger, have a higher rate of disability, criminal background and homelessness. The support services needed to help residents overcome these barriers are not typically offered through occupational skills training providers. This requires additional coordination to connect jobseekers with those supports.

Finally, in addition to occupational skills, businesses provided a list of "soft" skills that are equally important requirements for employment. Customer service, problem solving, interpersonal skills, time management and critical thinking skills are just some of the skills identified. More and more training programs are beginning to include training modules focused on these skills. More work is needed to ensure that "soft skills" are more blended into programs that provide occupational training.

The Board will need to engage stakeholders in the workforce development system – including ABE, occupational skills training, and support service providers to coordinate their efforts to build on the strengths and areas of opportunity listed below:

Strengths to Build On

- 43% or more of future jobs can provide a living wage and don't require a bachelor's degree. Short-term training programs that result in a credential can help fill the skills gap and prepare workers for careers in targeted industries.
- There is a small network of ABE providers in the city that can help address the basic skills gap. More effort is required to help jobseekers matriculate through basic education programs quicker and to better connect those completers with occupational skills training.
- More occupational skills training providers are beginning to offer soft skills training in conjunction with hard skills training. This practice can be adopted more broadly within the network of training providers to meet employer needs.

Areas of Opportunity

- Few credential or apprenticeship programs in Business Services, Manufacturing and Transportation/Logistics
- Approximately one quarter of the African American and Hispanic population in Baltimore has less than a high school diploma – these groups also have double digit unemployment (19% and 10% respectively)
- Unemployed residents have a number of barriers to employment but the support services they need are not available through occupational skills training providers

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

The Baltimore Workforce Development Board "envisions a city where every person maximizes his or her full employment potential and all employers have the human resources to grow and prosper."

In order to achieve this vision, it has adopted the mission:

"In collaboration with all key stakeholders, most importantly business, will build a workforce development system that drives and supports the local economy."

Operating under the guidance of Mayor Catherine Pugh, the board's goals fit within three (3) of the six (6) Mayoral Initiatives for growing a better, safer, and stronger Baltimore.

Thriving Youth and Families

An educated workforce is a thriving workforce. To build a strong system, it is important that our youth matriculating from schools with diplomas and post-secondary credentials are able to transition into meaningful full time work paying a high wage. In addition, it is essential that we don't leave behind those who have dropped or aged out of the public school system, by creating pathways to adult education that are strongly linked to employment.

In order to do this, the BWDB will ***more fully integrate adult basic education into Baltimore's workforce development system*** including the following:

- Create and disseminate career maps for targeted high growth industries
- Identify resources for numeracy and literacy enhancements for graduates and non-graduates
- Conduct an online survey to determine where programs exist that offer workforce development services and literacy skills upgrades with or without a high school diploma

Relevant WIOA Performance Measures: Measurable Skills Gains (Youth and Adults)

Vibrant Economy

A prosperous economy requires a responsive workforce system. The BWDB works to ensure that the skills taught to Baltimore City's workers are the skills needed by Baltimore City's employers. It also makes employers aware of and able to access the multitude of resources available to assist in their efforts to secure a skilled workforce.

One key strategy utilized to accomplish this objective is to host sector-based information sessions in which industry leaders learn of the services available and workforce officials gain a better understanding of the current needs within the sector.

In addition, other opportunities to ***promote and expand career pathways in the high growth industries and work based learning opportunities*** include:

- Engage Baltimore City Public Schools Career and Technology Education (CTE) to update the Youth Committee about available career pathways for in-school youth.
- Explore how youth are exposed to career pathways that are not connected to a CTE program.
- Identify viable career pathways for out of school youth, including both high school graduates and non-graduates

Relevant WIOA Performance Measures: Indicator of effectiveness in serving employers (Employer), Earnings after entry into unsubsidized employment (Youth and Adult), and Credential rate (Youth and Adult).

High Performing Government

If Baltimore hopes to become an exemplary model of the 21st century city, it needs a workforce system that generates and advances new ideas, and is led by a government that is flexible to the needs of the city's businesses, non-profits, and, most importantly, its residents.

Presently, the BWDB is working to ***create an environmental scan that maps all of Baltimore's workforce training programs (public, private, nonprofit)*** as well as key services that address the more prominent barriers to training and employment. It is working with business and non-profit stakeholders to develop protocols for collecting, summarizing, and sharing quantitative and qualitative impacts of occupational skills training (OST) providers.

Understanding that employment is more than a jobs issue, the BWDB seeks to ***develop interim and long-term solutions to address specific barriers to work such as transportation.*** The BWDB will achieve the following:

- Determine what barriers exist for out of school disconnected youth and create a report with recommendations (e.g. test taking, child care, substance abuse, criminal justice, technology access, social media)
- Host forums on new policies and initiatives that reduce employment barriers or increase employment access for city residents
- Support Vehicles for Change's East Baltimore Transportation Pilot, that will connect Baltimoreans to affordable, reliable transit options

Relevant WIOA Performance Measures: Entry into unsubsidized employment (Adult), Median Earnings (Adult), credential rate (Youth and Adults)

MOED has negotiated the following WIOA Performance Measures beginning July 1, 2017:

WIOA Performance Metrics	Agreed Upon Goals for PY2016 and PY2017
Adult Measures	
Employment Rate 2nd Quarter after exit	72%
Employment Rate 4th Quarter after exit	70%
Median Earnings 2nd Quarter after exit	$5,000
Credential Attainment within 4 Quarters after exit	55%
Dislocated Worker Measures	
Employment Rate 2nd Quarter after exit	68%
Employment Rate 4th Quarter after exit	68%
Median Earnings 2nd Quarter after exit	$6,500
Credential Attainment within 4 Quarters after exit	55%
Youth Measures	
Employment or Placement Rate 2nd Quarter after exit	65%
Employment or Placement Rate 4th Quarter after exit	60%
Credential Attainment within 4 Quarters after exit	67%
Wagner-Peyser Measures	
Employment Rate 2nd Quarter after exit	55%
Employment Rate 4th Quarter after exit	55%
Median Earnings 2nd Quarter after exit	$4,000

Negotiated levels for Measurable Skills Gains and Indicators of Effectiveness in Serving Employers are forthcoming. The measures for employers will be Employer Penetration Rate, Repeat Business Customers, and/ or Jobseekers Retained with Same Employer in the 2nd and 4th Quarters After Exit. (reference TEGL 10-16: Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs)

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

The analysis described in subparagraphs A – D above illustrate the challenges and opportunities that lay ahead. Clearly, the city is most likely to achieve its goal of developing a skilled workforce to meet the needs of area employers by strengthening the workforce system. This must include a broader set of more deeply engaged public agencies as well as educational institutions and community-based nonprofits. To align available resources in the local area, MOED has had initial meetings with the WIOA core partners (DLLR, Vocational Rehabilitation, Education, and TANF) and is in the process of developing/ restructuring the relationships with each partner organization. Our goal is to not only to create a stronger partnership between MOED and each organization but also to build a network of service delivery providers that truly and seamlessly meets the needs of area residents.

Section 2: Alignment of the Local Workforce Development System

This section should include –

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

The below table describes the programs and services offered in the AJC. The MOED and workforce partners have developed "Matrixes" that outline the scope of services provided by each partner. These tools will be utilized to create a common intake process and orientation session to promote coordination and increase integration. The Partners have also created a referral instrument and customer consent to release form to streamline the referral process to program(s) and increase our ability to track the outcome of referrals.

Baltimore City Partners and Services

	Entity	Services
Title I – Workforce Development Activities	Adult: Delivered by the Mayor's Office of Employment Development	Determine eligibility for career and individualized services, referral to occupational skills training and job placement assistance.
	Dislocated Worker: Delivered by the Mayor's Office of Employment Development	Determine eligibility for career and individualized services, referral to occupational skills training and job placement assistance.
	Youth: Administered by the Mayor's Office of Employment Development	Under WIOA the Youth Council is not mandated but due to the success and high level of participation of youth service providers, school system, non-profits, local and state agencies, and business it was decided to keep the Youth Council with the new name Youth Committee.
	Job Corps: Maryland Job Corps Adams and Associates, Inc.	A Job Corps admissions representative holds scheduled hours at the Eastside One-Stop Career Center to provide outreach, intake and orientation sessions for interested candidates. A Job Corps transition specialist provides job search assistance at the Eastside One-Stop Career Center.
Title II –Adult Education and Literacy	Baltimore City Community College	Provide assistance in establishing eligibility for programs with financial aid assistance for training and education programs provided under WIOA. Conduct diagnostic testing and use of other assessment tools; CASAS. Facilitate GED and ABE classes in the One-Stops Perform assessments and

		instructional services in basic skills and/ or English language skills for language acquisition. Provide integrated education and training programs including ABE/ESL Provide occupational skills training for in-demand jobs.
	LIFT	Assessments, advising, and instructional services in adult basic and secondary skills and/or English language skills
	South Baltimore Learning Center	Assessments, advising, and instructional services in adult basic and secondary skills and/or English language skills Cross referral of learners for skills upgrades Workforce Literacy Classes
	Strong City Baltimore	Assessments, advising, and instructional services in adult basic and secondary skills and/or English language skills Cross referral of learners for skills upgrades
Title III- Wagner-Peyser	State of Maryland, Department of Labor, Licensing and Regulation	Wagner-Peyser staff are located full-time at each One-Stop location to provide outreach, intake, orientation sessions, and job readiness sessions.
Title IV- Vocational Rehabilitation Services	State of Maryland Department of Education, Division of Rehabilitative Services	DORS counselor is assigned to Baltimore City One-Stops for referral to DORS Services if requesting any of the following: • an accommodation needed to access the AJC, or • indicates a need for multiple or extensive vocational

		services, or • Customer receives SSI or SSDI benefits as a result of a disabling condition (qualifies for Ticket to Work). • Is interested in specialize vocational rehabilitation services to assist with employment.
Senior Community Service Employment Program	State of Maryland, DLLR	Senior Aide Workers are located at some One-Stop sites. Outreach, intake and orientation to One-Stop services for older workers are the shared responsibility of all partners. All Staff are trained on the workforce development services available through the Older American's Act. Detailed descriptions are available at One-Stops at all partner sites.
	Senior Service America	Provides Senior Aide Workers at some One-Stop Sites. Outreach, intake and orientation to One-Stop services for older workers are the shared responsibility of all partners. All Staff are trained on the workforce development services available through the Older American's Act. Detailed descriptions are available at One-Stops and all partner sites.
Temporary Assistance to Needy Families	State of Maryland, Baltimore City Department of Social Services	Through a partnership with MOED, BCDSS provides workforce development services to TANF recipients. In the coming year, collaboration and integration of workforce development services aims to increase participation of TANF recipients in WIOA services.
Vocational Education Activities under	Baltimore City Community College	Career and Technology Education (CTE) prepares both youth and adults for a wide range of careers.

Carl D. Perkins Career and Technical Act of 2006		The careers require varying levels of education- from high school and postsecondary certificates, to apprenticeships. Students add value to their overall education by completing CTE programs of study that provide opportunities to earn industry-recognized credentials.
Trade Adjustment Assistance	State of Maryland Department of Labor, Licensing and Regulation	WIOA DW program, provide some services to TAA participants along with WP staff, supervised by DLLR supervisors, typically have primary responsibility for the program at the one-stop and assist TAA participants with completing and submitting all paperwork required to receive training. They also assist participants with completing some requirements associated with their receiving Trade Readjustment Allowances (TRA), such as applying for and renewing waivers.
Veterans	State of Maryland Department of Labor, Licensing and Regulation	Veteran staff are located at each of the One-Stops to provide services to veterans.
Community Service Block Grant	City of Baltimore Housing and Community Development, The Mayor's Office of Human Services, Community Action Centers	At a minimum, detailed service descriptions for each of the Community Action Centers (CAC) are available at the One-Stop locations. Information on the services available through the One-Stops is available at the CACs.
Housing and Community Development	City of Baltimore Housing and Community Development, Housing Authority of Baltimore City	Services are provided through direct referral to the One-Stops.
Unemployment Compensation	State of Maryland, Department of Labor, Licensing and Regulation	Working in conjunction with the UI Division, DLLR Workforce staff require that UI claimants attend re-employment workshops. Attendance records are shared with UI, who can assure that

		claimant status reflects lack of participation. Through information shared at these workshops, DLLR staff also ensure that claimants are connected to additional individualized and training services. Also, DLLR staff attend the center's staff meetings to stay apprised of upcoming opportunities and events.

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

The board and MOED seek to deliver job-driven, effective training and align employment services to meet the needs of employers, and job seekers, especially those with barriers to employment. The intent of the board and MOED is to reach the untapped talent to increase the number of job seekers served and quality of services, particularly supportive services, provided through an integrated approach to service delivery. This process will need to be flexible and adaptable to the varying needs of the city's job seekers. The approach will include a deep dive into neighborhood and community engagement, diverse business outreach specifically for small and medium size businesses, start-ups, as well as professional organizations and chambers.

Through its role as leader and convener, the BWDB will engage its members in identifying workforce needs, and the gaps in services that affect target populations, as well as to direct continuous quality improvements in the workforce system.

The Opportunity Collaborative as well as the Baltimore Regional Talent Development Pipeline study identified high growth industries in Baltimore. This information was shared with the BWDB Youth Committee as well as WIA/WIOA Service Providers. The BWDB YC subcommittees reviewed the information to determine how it could be shared on a larger scale with youth/young adults. Each WIOA Provider that offers an occupational skills training experience that leads to an industry recognized credential must make sure it aligns with one of the high growth industries. The Youth Committee members are encouraged to have their participants familiarize themselves with the MOED Career Center services, part of Maryland's America Job Centers system.

The Baltimore Workforce Development Board (BWDB) sets the strategic direction for the programs and initiatives of the Mayor's Office of Employment Development (MOED), and the City's public workforce development system. The Board is a strong advocate for building robust pipelines of

qualified workers, increasing the competitive advantage of the City's business community and strengthening the local economy as a result.

MOED is an open-access system that seeks to serve all Baltimore City residents. The MOED has aligned its policies to reach those most in need – the unemployed, underemployed job seekers in need of adult literacy and job readiness training, people with barriers to employment, and youth preparing to enter the world of work. By advancing a legislative agenda at the local, state and federal level that addresses the City's most pressing workforce issues, the BWDB aims to build a pipeline of workers qualified with the skills local employers need to thrive in a competitive global economy.

Through joint planning meetings the MOED and One-Stop partners developed a " Service Matrix" that outlines the responsibilities of each partner. These tools will be used to coordinate and align workforce and educational activities to increase referrals to programs. The intent is also to utilize these tools to design a robust customer orientation session that will inform customers about all programs and services. A "common intake" process is being developed to promote integration and enhance the triage process. Further, a referral mechanism and customer consent form was created to help streamline the referral process and increase our ability to track outcomes of referrals. In future planning meetings the workforce partners will continue its work to align data collection processes and methods for exchanging information about common customers.

The table listed below is an example of a Services Matrix to align partner services.

		WIOA- WA/WD	WIOA Youth	Wagner Peyser	Unemployment	DORS	LIFT	DLLR/Veterans	TANF	ROW/RESEA	Job Corps Admissions	Job Corps– CTS	Ex-Offenders	Adult ED BCCC	Strong City	S.Baltimore Learning	Older Workers	CAP
Basic Services	Screening Eligibility	✓	✓	✓		✓x			x				✓	x	x	x	✓	x
	Outreach/Intake Orientation	✓x	✓			✓x	x				✓		✓	x		x	✓	
	Informal Initial Assessment	✓	✓	✓		✓x			x		✓	✓x	✓	x	x	x	✓	
	Labor Exchange Services/LMI	✓	✓	✓								✓x	✓					
	Referrals to programs	✓	✓	✓		✓x	x		x		✓	✓x	✓	x	x	x	✓	x
	Performance, Cost Information Training Info	✓		✓		✓							✓	x				
	UI Information and Assistance	✓		✓	☎													
	Financial Aid Information	✓	✓	✓		✓x						✓x		x		x		x

A sample of the "Training Matrix" is listed below. This is a tool to assist partners with information about training providers and eligibility criteria.

CCN TRAINING MATRIX – QUICK REFERENCE GUIDE

General Training Requirement: Most training programs require participants to have a high school diploma (HSD) or general education diploma (GED)

TRAINING TYPE	TRAINING PROFILE	STAFF CONTACT	ELIGIBILITY CRITERIA	APPLICATION PROCESS	COSTS/ CAPS	CURRENT OFFERINGS
Individual Training Account (ITA)	Under WIOA, training services for adults and dislocated workers are provided through ITAs. All training must be MHEC approved and under contract with MOED.	Contact the closest Career Center Network location: Eastside Career Center 3001 E. Madison St. 410-396-9030 Northwest Career Center Mondawmin Mall 410-396-7873 Employment Connections Center 1410 Bush Street 410-396-1052	Open to Baltimore City residents approved through the WIOA standard enrollment process	ITA application process with technical assistance provided by case manager: - Customers must register at a One Stop center and attend orientation. - Customers must bring in required eligibility documents. - Customers are assigned a case manager who personally guides them through the application process. - Customers must complete the Pell Grant Application - Staff must ensure that customers understand that the approval process takes 45 – 60 days. - Applications are approved by supervisors and signed off on by managers.	No cost to participants/ WIOA funds are capped at $3,000 per customer. Training costs in excess of $3,000 are incurred by the customer	The following vendors are approved*: o Allstate o BCCC o MCAT o Towson U. o American Health Careers o JARC o SW Design o Stein Academy o Health Focus *See www.mhec.state.md.us (MHEC list) for WIOA Occupational Training Programs complete course listings.

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

Baltimore's Local Board includes a representative of each of the entities described in Section A above. WIOA implementation has been a major topic of discussion at nearly every board and committee meeting. MOED, on behalf of the BWDB, hosted a partner's kick off meeting in the fall of 2015 to more formally discuss changes in law resulting from WIOA and opportunities for stronger partnership that resulted. In the spring of 2016, MOED hosted individual discussions with each of the core partners to discuss integration and alignment of services for Baltimore City residents. The full board reviewed a draft of the local plan in June, 2016. Comments/ feedback were incorporated into the plan prior to the public comment period. At the September board meeting, a final draft will be shared with the board for final approval and signature.

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

- To facilitate engagement of businesses, including small businesses and businesses in in-demand industry sectors and occupations, in workforce development programs

  The MOED Business services team targets businesses in Baltimore's 8 high growth industries and meets with the company executives and Human Resource staff to determine workforce challenges and solutions that can meet the employer need and benefit city residents. These workforce solutions include strategies which enable the employer to develop training for targeted new hires that is customized specifically for the occupation. Business services team members encourage & incentivize customized training/on-the job training by offering employers a reimbursement of training funds using WIOA and other funding resources. In accordance with WIOA guidelines, reimbursements can range between 50% and 90 % of the total training costs. Employers that participate in the customized training and OJT strategies must make an up-front commitment to hire trainees who successfully complete the training. As funding allows, MOED will also assist

businesses to train incumbent workers using a similar strategy of customized training for the employee based upon the current occupation, career path and resulting economic impact for the company.

Understanding the role that small businesses play in economic development and job opportunity, a targeted business development approach will be used which includes small businesses identified by the BWDB and other business associations including Baltimore City Chamber of Commerce, Greater Baltimore Committee, Baltimore Development Corporation, Small Business Resource Center, and the Mayor's Office of Minority and Women Business Development. Business Services staff will participate on various committees of these organizations to promote available services and engage businesses in workforce development programs (training, job readiness, curriculum development).

In addition, the Business Services Team provides services to area employers in a coordinated manner to avoid multiple points of contact. The following services are available to local employers:

- Prescreening candidates for job opportunities
- Recruiting assistance.
- Occupation/industry information and data.
- Job fairs/recruiting events.
- Customized assessments.
- Human resources assistance.
- Convening and facilitating industry partnerships to address common talent development issues.

- To support a local workforce development system that meets the needs of businesses in the Local Area

The BWDB envisions a comprehensive system in which public agencies, the nonprofit community and the private sector work in true partnership to create an industry sector strategy that stimulates career pathways for residents to access good jobs and provides a simplified process for employers to find their skilled workforce. Workforce solutions have proven successful when we engage our local partners. An industry sector strategy approach will collectively address the workforce needs of businesses and the needs of city/local residents by creating better employment opportunities with career pathways.

- To better coordinate workforce development programs and economic development

MOED partners with the Baltimore Development Corporation (BDC), the local economic development agency, and the state Department of Commerce to encourage business to locate stay and expand in Baltimore City. As businesses express interest in Baltimore, BDC conducts a joint meeting with MOED and the business to discuss the local labor force and workforce strategies that can assist the company. This partnership enables MOED to work with its Career Centers, youth programs and local/regional workforce partners to prepare jobseekers for the employment

opportunities that will become available. Using this model, MOED has created training workshops for jobseekers that are customized to the specific skill requirements of the business and results in a better job match and increased employment for City residents.

Economic development creates workforce development and working with BDC, MOED has established many relationships with developers that require workers for the construction build out and tenant phases of projects. To meet the workforce demand, when appropriate, Memorandums of Understanding are created between the developer and MOED to coordinate recruitment activities on a city wide and/or regional basis. This ensures that there is a streamlined process to help job seekers access opportunity and employers locate their skilled workforce. In addition, "Lunch & Learn" gatherings, joint staff meetings and presentations are held between MOED and BDC staff to educate each other on upcoming projects and new services. As a liaison for BDC, MOED also supports outreach efforts and partners to conduct information/ educational and network events for businesses.

- To strengthen linkages between the American Job Center delivery system and Unemployment Insurance programs;

  Working in conjunction with the UI Division and the Workforce Development Division, UI claimants are required to attend re-employment workshop, hosted in the AJC's. These workshops facilitate the connection to basic and individualized career services and training services available. Further, attendance records are shared with UI, to ensure that claimant status reflects their level of participation. Also, joint staff meetings help staff stay apprised of upcoming opportunities and events.

(E) A description regarding the implementation of initiatives such as EARN Maryland, apprenticeship, incumbent worker training programs, on-the-job training programs, customized training programs, industry and sector strategies, integrated education and training, career pathways initiatives, utilization of effective business intermediaries, and other business services and strategies, designed to meet the needs of businesses in support of the strategy described in Section 1.

MOED has used a variety of strategies to ensure that Baltimore City residents and employers have access to instructional methods that are designed to meet the needs of business. Using a blended funding strategy that includes discretionary funds such as the DOL Youth Demonstration Grant awarded in 2015, WIOA formula funds, the city general funding and EARN Maryland resources, MOED has been able to engage city residents in high growth, high demand training offered by organizations including but limited to BioTechnical Institute of Maryland, Inc. for laboratory technician training, Job Opportunities Task Force's (JOTF) Jumpstart for pre-apprenticeship construction trade training, Civic Works for jobs in sustainable green occupations, Baltimore Alliance for Careers in Healthcare for jobs in the healthcare industry, Humanim for jobs in culinary and the hospitality industry, Maryland New Direction for maritime transportation and logistics training, Maryland Manufacturing Extension Partnership for jobs in the manufacturing industry, Vehicles for Change for automotive technician jobs, New Pathways, Inc. and Maryland Center for Adult Education for training in CNA/GNA, Jane Addams Resource Corporation for training for welding and CNC machinists, and Berry Plastics for entry level positions in manufacturing.

Apprenticeship

Over the next four years, the BWDB and its Business Engagement Committee intends to convene key business stakeholders and education providers to explore new apprenticeship models in Energy, Information Technology and other emerging occupations as the demand is identified. The board will also seek to identify platforms to promote existing apprenticeship programs to attract the future workforce. ***WIOA defines the term registered apprenticeship program as a) registered under the Act of August 16, 1937 (commonly known as the "National Apprenticeship Act") and b) that meets such other criteria as may be established by the Secretary under this section.***

Customized Training

MOED offers several business driven strategies to promote and encourage the hiring of new employees in high demand, high growth industries. Business Services staff meets with employers to learn about their workforce needs and assists them with accessing strategies that offer the best solution. Strategies include: customized training, OJT and upgrade skills training. Under WIOA, Customized Training is defined as training that: a) is designed to meet the specific requirements of an employer, b) is conducted with a commitment by the employer to employ an individual upon successful completion of the training and c) for which the employer pays a significant portion of the cost of training. Customized Training assists businesses in hiring skilled workers for hard-to-fill or newly created positions. Businesses are responsible for a 50% match for each dollar invested in skills training. The employer match can be made monetarily or with in-kind contributions.

Training guidelines are as follows:

- Businesses agree up-front to hire successful training completers in full-time permanent positions with health benefits.
- Medical benefits requirement may be waived for businesses with less than 50 employees or who pay wages at completion of training that are greater than or equal to $10 an hour.
- Businesses agree to pay new employees a competitive hourly rate for the industry sector.
- Businesses establish minimum qualifications and MOED pre-screens qualified unemployed or underemployed job seekers to create an applicant pool
- Businesses conduct the job interviews and make the final selection to fill training positions.
- Business Services staff reviews proposals on an on-going basis and approves proposals that meet the strategy requirements.
- The city's Board of Estimates must approve proposals and a signed agreement must be in place before applicant recruitment can begin. Typically, the agreement process takes 60-90 days.
- Training must be completed in a reasonable timeframe, on average 4-6 months
- Training costs must be reasonable and fully documented. The average cost for training is approximately $3,500 per person.
- Training can be employer-based and/or offered by qualified vendors (e.g., OJT or classroom)
- MOED reimburses the employer for training costs (including equipment, vendor training, etc.) up to a maximum of 50%

OJT

On-the-job training as defined by WIOA means training by an employer that is provided to a paid participant while engaged in productive work in a job that: a) provides knowledge or skills essential to the full and adequate performance of the job, b) is made available through a program that provides reimbursement to the employer of up to 50% of the wage rate of the participant, except as

provided in section 134 (c)(3)(H), for the extraordinary costs of providing the training and additional supervision related to the training, c) is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the prior work experience of the participant, and the service strategy of the participant as appropriate.

Industry and Sector Strategies

In 2012, the Magna Baltimore Technical Training Center was closing its doors, returning the building to the city and donating all equipment and furniture intact. The Mayor's Office of Employment Development saw this as an opportunity to develop a multi-skills training facility in the Park Heights community. MOED partnered with the State of Maryland, Department of Labor, Licensing and Regulation, Commerce, and the city's housing and philanthropic organizations to create a strategy for the site. The group conducted a labor market analysis, convened employers to understand their challenges and needs, and convened training and educational providers to assess existing training options. This information was used to determine the ideal career pathway model to connect low-skilled workers in the region to middle skilled jobs with potential for advancement. Through exploration and a series of ongoing discussions an entity, the Jane Addams Resource Corporation (JARC)—operating a manufacturing training program in Chicago- was identified as the anchor institution offering machinist and welding training at the site. Beginning in FY2017, it is expected that the center will be 90% occupied offering local residents opportunities in three sectors—manufacturing, construction and healthcare.

A second sector initiative underway under the guidance of the Baltimore Workforce Development Board's Business Engagement Committee is with port-related industries. Beginning in May 2016, the city and the Business Engagement Committee met with over ten businesses and the Maryland Port Administration to learn about projected job needs, recruitment methods and workforce challenges. MOED also shared workforce opportunities and services. Next steps include a business to business survey to identify desired skills, the sharing of job descriptions, posting of job orders, job recruitment, informational sessions for job seekers and a sector awareness session and port tour for staff.

Integrated Basic Education and Skills Training (I-BEST)

The Accelerating Connections to Employment (ACE) Initiative was a four-state nine-workforce investment board effort modeled on Washington State's highly regarded I-BEST program which was designed for students with low basic skills. It integrated basic skills upgrading, occupational skills training, student supports and career navigation to help students earn occupational certification related to high demand occupations offering a career pathway. MOED was one of the local areas that learned from this initiative, found it to be successful and plans to keep this model in the tool kit of options.

Career Pathways

MOED expanded its career pathways opportunities through its One Baltimore for Jobs (1B4J) initiative which offers 100s of residents the opportunity to receive education and occupational skills training leading to an employer recognized certification and placement within the industry sector. The demonstration has created a network of partnerships between MOED, other public agencies and over 20 nonprofit organizations to connect residents to support services such as legal assistance, adult education, and child support. 1B4J has laid the groundwork for building a talent pipeline

critical to the city's economy. It will require strategic thinking by the Board and residents to transition 1B4J to a sustainable model; one that is fully integrated with WIOA operations.

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

To promote entrepreneurial skills training, MOED will work with the City Chamber of Commerce, and BDC-Small Business Resource Center to host forums and information sessions at the career centers, youth programs and partner locations to assist individuals interested in starting a business. Business leaders will be invited to provide presentations and tips that can enable residents to take the next step to write a business plan, secure funding and start a business. MOED will also coordinate with the above organizations to assist with the development of a resource guide/list of providers that conduct entrepreneurial skills training and microenterprise services.

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

The Family League of Baltimore City is the Local Management Board. Their goal is that by 2030 all children in Baltimore will be born healthy, succeed in school, graduate high school and transition into higher education and the workforce.

The BWDB Youth Council through the awarded WIOA service providers has developed an extensive menu of services for participants. Enrolled youth have an opportunity to access academic opportunities, intensive job readiness training, occupational skills training, internships, life skills and other meaningful support services. The BWDB Youth Committee brings together stakeholders from government, public, private sectors and youth serving organizations. These connections assist us in working towards the common goal of helping the citizens of Baltimore.

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

The city's BWDB is led by the private sector. Their input provides guidance to help develop workforce activities and curricula that meets the current needs of local employers. An industry sector based strategy will assist MOED in increasing business input from a local and regional perspective. This strategy creates stakeholder partnerships that can result in business driven training curricula.

The BWDB met on June 17, 2016 and agreed to use its resources to:

- influence boards and other licensing bodies to reevaluate policies, written in the 50's, which prevent the current workforce from gaining successful careers,
- use business led boards, GBC, and others to promote hiring of returning citizens,

- help employers avoid lawsuits that result in denying employment,
- create and promote internship opportunities for small business,
- revolutionize the one-stop systems by offering online programming, and
- better educate businesses on resources.

MOED also has cultivated partnerships with business associations including the Greater Baltimore Committee which provides access to a larger group of businesses in the metropolitan area. We will use these partnerships to expand the opportunity for businesses to provide input on training, job readiness and other workforce development activities.

The Baltimore Workforce Development Board believes in a demand-driven system based on the needs of local businesses. Board members will provide a voice in the delivery of workforce development activities, gather information from industry-specific sectors and target industry services based on formal labor market intelligence and on sector-based focus group discussions. Meeting with businesses individually or in groups, the Board will discuss and identify staffing challenges, occupational and non-occupational skills most needed and projected hiring needs. The board will engage in industry-led partnerships to identify and develop work and learn opportunities such as: registered apprenticeships, on-the-job training, internships, work experience, incumbent employee training, summer jobs and other work and learn opportunities to meet the demands of business.

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

The BWDB will use its platform to promote and cultivate industry-led partnerships by engaging industry associations, EARN providers and MOED workforce system partners to help increase the competitive advantage of key industries in the local economy and ensure that there is a trained workforce to fill employer needs. The BWDB through MOED, will use it resources to work with existing or new industry sectors to identify and forecast labor market trends, understand the essential and technical skills needed by the sector, identify curricula and the service delivery method that will best equip new workers and incumbent workers with the skills needed to meet job demands.

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

Faith and community based organizations (CBOs) play a vital role in the local workforce development system. Many refer residents to American Job Centers for services while staff at the AJC's and other city workforce centers partner with faith-based organizations and CBOs for more neighborhood-based services. City staff participate regularly participate in job fairs, and community events that connect residents to resources and other workforce initiatives. AJC staff provide materials and/or participates in outreach events to share information about workforce services to inform and engage residents.

There is strong coordination among public, community and faith-based organizations in Baltimore's workforce system focused on ex-offender re-integration and employment initiatives. Dozens of non-profit groups including Catholic Charities, the Job Opportunities Task Force, Goodwill Industries of the Chesapeake, and many faith-based leaders participate in the activities that are a part of the Reentry

Partnership Network. The Reentry Partnership Network provides a platform to discuss trends, share information about employment and training opportunities, and collaborate and coordinate resources.

Perhaps the best example of this partnership is through the 1B4J initiative where nearly 20 neighborhood organizations partner with MOED and other public agencies to provide a full-range of support services and occupational skills training.

The Community Job Hubs are another example of MOED's collaboration with community and faith based organization. Partnering with organizations like Bon Secours, My Brother's Keeper and Govens Ecumenical Development Corporation (GEDCO). The Hubs offer core workforce services to residents in several isolated, distressed communities in Baltimore City. MOED, in tandem with the community partners, employ and train neighborhood residents to learn how to access a variety of computer-based tools, including the Maryland Workforce Exchange job match system, in order to help residents identify skills, assess employment readiness, explore labor market opportunities and career options, build electronic resumes, set up email accounts and search for jobs.

Section 3 – American Job Center Delivery System

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

(A) List the American Job Centers in your Local Area, including address and phone numbers. Indicate the One-Stop Operator for each site and whether it is a comprehensive or satellite center. Baltimore City's current configuration includes:

Two comprehensive American Job Centers:

Eastside One-Stop Career Center
3001 E. Madison Street
Baltimore, Maryland 21205
410-396-9035
410-361-9648 (fax)

Re-entry Center @ Northwest One-Stop Career Center
Mondawmin Mall
Baltimore, Maryland 21215
410-523-1060
410-523-0970 (fax)

Satellite Employment Center:

Employment Connection Center
1410 Bush Street
Baltimore, Maryland 21230
410-396-1052

Community Job Hubs (Satellite Employment Centers)

Bon Secours Community Works
26 N. Fulton Avenue
Baltimore, Maryland 21223
410-362-3629

Govans Ecumenical Development Corporation (GEDCO)
5513 York Road
Baltimore, Maryland 21212
410-532-7117

My Brother's Keeper
4207 Frederick Avenue
Baltimore, MD 21229
410-644-3194

Under a contract with the Baltimore City Department of Social Services (BCDSS), MOED also operates the Workforce Reception Center where services to the TANF population are provided. Referrals are made by BCDSS, and customers have access to a variety of services including the Maryland Workforce Exchange, job readiness, and work experience and job placement.

Workforce Reception Center
100 W. 23rd Street
Baltimore, Maryland 21218
410-396-6770

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

The American Job Centers employ a triage service delivery model. This model ensures that a customer is not forced to follow a prescribed set of processes that may not meet their needs. Rather, a Greeter provides the customer with an informal assessment and overview of Career Services and center resources and then connects the customer to the appropriate service and/or partner.

When a customer enters the American Job Center and self identifies as a Veteran, the greeter administers the Veteran Services Significant Barriers to Employment Categories Eligibility Checklist to screen the veteran. This tool is an assessment that determines whether the veteran has a significant barrier to employment and should be given the option to meet with a representative of the Disabled Veteran Outreach Program (DVOP) for individualized services. If the assessment does not reveal a significant barrier then the veteran receives non-specific veteran services.

All customers, including veterans, are encouraged to attend the center's information session, which is designed to familiarize the customer with the full menu of Career Services offered by the One-Stop centers and partners. The menu of Career Services includes: employment opportunities, a variety of job readiness workshops, web-based tutorials, partners services, individualized and training opportunities.

These services are provided in a manner that does not require sequence of service and allows the customer to access the resources and activities they need to succeed. New customers are encouraged to enroll in the Maryland Workforce Exchange (MWE), the State of Maryland's job match system, prior to accessing center services. Career Services are classified into two categories: Basic and Individualized Services (See Section 4.A.)

Interpretation service is available for limited English speaking customers through the Language Line. Similarly, assistive technology equipment is available for those visually impaired customers and on-demand video relay is available for those customers requiring sign language interpretations.

For those customers interested in services beyond basic career services an appointment is given to meet with a Career Development Facilitator who determines their eligibility for WIOA funded services and other specialized funded programs, conducts a comprehensive assessment, career planning and develops the Individual Employment Plan.

Eligibility Assessment

The Career Development Facilitator (CDF) conducts an eligibility determination and assessment of the customer's suitability for WIOA Adult and Dislocated Workers services or special project eligibility such as, National Emergency Grants (NEG), reentry services, services for refugees, etc. and collects the required documents that verify eligibility. Once eligibility has been determined, the customer receives a comprehensive assessment to evaluate skills, aptitude, interest and ability.

Case management and Development of the Individualized Employment Plan

The Career Development Facilitator (CDF) meets with the customer to understand their interest, goals and any potential barriers to employment that may need to be addressed. The CDF determines the customer's suitability for individualized and/or training services and eligibility for WIOA and other grants.
The results of all assessments are then used to develop the Individual Employment Plan (IEP). The IEP is jointly developed by the customer and the CDF and identifies the customer's employment goal(s), achievement objectives, and the appropriate combination of services for the customer to achieve their career objectives. Further, the plan documents the need for skills training, remediation, job readiness skills, and/or occupational skills training; and outlines the frequency of contact with the customer i.e. weekly, bi-weekly and/or monthly to continually track and (re)assess progress towards the career objectives as defined in their IEP.

Case managers facilitate and monitor individualized career services and training services. WIOA services are recorded in the Maryland Workforce Exchange and the customer's case file. Further, the CDF provides consistent counsel to ensure the customer stays on target to execute the strategies outlined in the IEP and provides guidance on solutions to challenges that may prevent or derail them from accomplishing their goals, as mapped out in the IEP.

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

MOED maintains operations at two full service AJCs strategically located in Baltimore City – Eastside One-Stop Career Center, 3001 E. Madison Street; The Re-entry Center at the Northwest One-Stop Career Center, 2401 Liberty Heights Avenue, Mondawmin Mall; and a satellite center, the Employment Connection Center, 1410 Bush Street. All centers are accessible via mass transportation.

The MWE and the MOED website provide access or links to employment opportunities, labor market information, and a ready pool of job seekers. MOED also provides the workforce system, community and faith based partners with bi-weekly information on current job openings via *Hiring Now* alerts.

MOED participates in outreach activities within the community sharing information about services and job opportunities at community fairs, meetings, and festivals. In partnership with developers, MOED's Business Service Division participates in community association meetings to provide information on services available at the AJC's which will help to prepare residents for job opportunities related to development projects in the local area.

MOED has established Community Job Hubs within existing community programs in several areas of the city to increase access to employment and training services, computer literacy, labor market information and exposure to online application processes and job matching tools.

The MOED will also ensure that citizens will have access to information about access to transportation.

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

Consistent with section 121(d) of WIOA, BWDB, with the agreement of the Chief Elected Officials shall designate or certify one-stop operators and may terminate for cause the eligibility of the provider selected. Selection of the One-Stop Operator will be through a competitive process and shall be a public, private, nonprofit, or consortium of entities comprised of three (3) or more American Job Center partners. The selected One-Stop Operator will have demonstrated effectiveness and will be located in the local area. Examples of organizations that may competitively apply include: institutions of higher education, employment service State Wagner-Peyser Act agencies, community-based organizations, nonprofit organizations, private-for-profit entities, government agencies, local chambers of commerce, business organizations, labor organizations, career and technical education schools, and other interested organizations or entities. Elementary schools and secondary schools shall not be eligible for designation or certification as a One-Stop Operator.

Organizations applying for One-Stop Operator designation must disclose any potential conflicts of interest arising from the relationships with other service providers. The selected One-Stop Operator(s) may not establish practices that create disincentives to providing services to individuals with barriers to employment who may require longer-term services, such as intensive employment,

training and education services. And, the selected One-Stop Operator(s) must comply with Federal regulations and procurement policies related to calculation and use of profits. The BWDB will consider proposals that have direct costs associated with providing the One-Stop Operator roles and responsibilities, and proposals that have costs incorporated within other on-site service provider activities and no direct One-Stop Operator budget.

To ensure there is no conflict of interest or perceived conflict of interest, the BWDB will contract with an independent consultant to facilitate the procurement process. The Operations Committee of the BWDB will work directly with the independent consultant to develop a request for proposal and evaluation tool. No workforce system service provider or potential service provider will be involved in the development of the request for proposal or the selection process. In the event only one proposal is received, the BWDB will proceed with sole source procurement with the approval of the Chief Elected Officials.

The One-Stop Operator procurement will be completed by July 1, 2017 with the option to renew annually for four (4) years.

(E) A description of how the Local Board will ensure the continuous improvement of eligible providers of services through the system and ensure that such providers meet the employment needs of local businesses, and workers and jobseekers;

The Baltimore City One-Stop System embraces the concept of a market driven eligible provider system with a customer driven consumer reports system. The Department of Labor, Licensing, and Regulation (DLLR) oversees the State's Eligible List of Training Providers and reports on program enrollments and performance outcomes for all training providers listed. Customers are educated through consumer reports including timely accurate information on training provider curricula, support systems, outcomes and employment potential. Career decisions are based on labor market information that includes employment trends, and selections are made in high growth industries with career path opportunities. To remain competitive in such an environment, training providers must design programs that are responsive to employer, worker and jobseeker needs. DLLR will monitor provider's performance on an ongoing basis and poor performers shall be deleted from the list of eligible providers. Training providers shall be made aware of the new requirements by DLLR prior to participating as an eligible provider. Technical assistance, as it relates to improving program outcomes, may be made available to eligible providers through the One-Stop Operator.

Customers interested in occupational skills training must attend a training orientation to receive an Individual Training Account (ITA) application. The application process requires customers to justify that their requested training is in an occupation/industry with high growth projections (20% +). Using current labor market information, customers thoroughly research the demands, entry requirements, salary potential and certification requirements of their career choice, compare the performance and ancillary services of chosen vendors, and research job opportunities.

Completed applications are reviewed with the customer by center staff to ensure completeness and accuracy. The center supervisor also reviews the completed application packet and provides sign-off approval prior to submission to the Contract Specialist. Once the funding is approved by the Contract

Specialist, a "Welcome to ITA" packet is issued to the customer which reinforces their responsibility while in training and provides the start date and estimated end date of training. Extensive follow-up is conducted while the customer is in training to ensure that they are progressing and to offer assistance and guidance, as needed. Customers are required to submit attendance and grades to center staff and in concert with center staff, develop and participate in a job search plan commencing 30-60 days prior to their estimated training completion date. The BWDB set the current cap for ITA vouchers at $3,000, allowing for the consideration of exceptions based on an individual's documented need and circumstances that would prevent them from preparing for a high demand occupation. Changes to the cap will be reviewed after final budget allocations are set. Generally, training should be completed within one year.

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

All AJCs and satellite centers are conveniently located and accessible via public transportation. The MWE and the MOED website provide virtual links to employment opportunities, labor market information, and a ready pool of job seekers. MOED circulates bi-weekly information on job openings via "Now Hiring Alerts" to workforce and faith-based community partners.
MOED also distributes information about AJC services during outreach events such as community fairs and meetings, the Mayor's Town Hall meetings, and other community events. In partnership with developers, MOED's Business Services Division participates in community association meetings to provide information on services available at the One-Stop Career Centers which help to prepare residents for job opportunities related to development projects in the local area.

The Wagner-Peyser staff conduct monthly job readiness workshops at the Enoch-Pratt library to inform and prepare residents with the skills to obtain employment.

In addition to circulating the bi-weekly job openings via "Now Hiring Alerts" and regular outreach, MOED offers services at three "Community Job Hubs" within high poverty/ low income neighborhoods where the residents live. MOED CJH's increase access to employment opportunities, computer literacy, labor market information, web-based learning tools, exposure to online application process and access to training opportunities available at the one-stops.

Through the use of technology, The Mayor's Office of Employment Development is able to facilitate access to services provided through the American Job Center delivery system, including:

Online Employment and Training

The Maryland workforce Exchange (MWE) is an interactive website that offers customers the following services:

- Job Searching
- Job Application submission
- Job Recruiting services
- Resume creation
- Job readiness training and related online courses

- Up to date labor market information (LMI)

Customers have access to computer literacy training through the Teknimedia web based training license. Customers learn the following basic computer literacy skills:

- Computing Fundamentals:
  · Understanding computer types and parts
  · Understanding how computers work
  · Identifying software types
  · Windows desktop
  · Managing files and folders

- Key Applications:
  · Common features of Microsoft Windows Applications
  · Skills for operating word processing software
  · Specific skills for operating a spreadsheet

- Living Online
  · Network connections
  · Electronic mail (e-mail)
  · Social impact of the internet
  · Operation of web browsers

  Customers also have access to a variety of online tools to assist with improving skills including:

- Educational skills training is provided with the web based Plato Learning System. It provides training in the core subject's math and reading and assists with credit recovery and GED preparation.

- Life skills training is provided online with Casey Lifeskills online.

- Job readiness training is provided with the 21st Century Job Readiness Online Training and includes a post assessment and certification of completion which is available at http://moed.baltimorecity.gov/job-seekers/job-readiness-tools.

- Career skills assessment is provided through MOED's website at http://moed.baltimorecity.gov/job-seekers/job-readiness-tools with an online interest inventory, Compass, which leads job seekers to the Maryland Workforce Exchange. The Maryland Workforce Exchange offers a variety of assessment including ONET and a transferable skills assessment.

- GED assessment and training is provided through Aztec Software and GED.com respectively.

The Aztec software and GED.com are used to measure the learner's progress and readiness to take the GED test. GED.com is a summative tool that measures whether GED students are ready to take the GED test and/or areas in which the learner may be having challenges. The GED portal/ LACES accounts provide Title II providers (with whom MOED partners) with access to GED test results and the ability to track the learner's attendance, pre/post test scores, demographic information, goals, barriers, etc.. The Providers also monitor the learner's progress/ provide interpretation in accordance with policy and standards set forth by Adult Education and Literacy Services - Workforce Development & Adult Learning i.e. (testing standards, frequency, documentation, etc.).

(G) A description of how entities within the American Job Center delivery system, including American Job Center operators and the American Job Center partners, will comply with Section 188 of WIOA, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing the needs of individuals with disabilities;

In serving persons with disabilities, the MOED and youth service providers will make every effort to provide reasonable accommodations to allow for full program participation including, but not limited to, providing auxiliary aids and services and ensuring effective communications through alternative formats. The MOED intends to collaborate with DORS and other vendors on staff development training to enhance customer engagement.

Within the past year, The Youth Services Division and WIOA youth service providers participated in a training program developed by the National Collaborative on Workforce and Disability for Youth (NCWD/Youth). The NCWD/Youth is composed of partners with expertise in disability, education, employment and workforce development issues.

Four sessions were held:

*Knowledge of the Field: This is the Work That We do
*Communication with Youth: The Helping Relationship
*Assessment and Individualized Planning: Charting a Course with Youth
*Employer Relations: Beyond the Handshake

(H) An acknowledgment that the Local Board understands that, while Section 188 of WIOA ensure equal opportunity for individuals with disabilities, sub-recipients may also be subject to the requirements of:

a. Section 504 of the Rehabilitation Act, which prohibits discrimination against individuals with disabilities by recipients of Federal financial assistance;
b. Title I of the ADA, which prohibits discrimination in employment based on disability;
c. Title II of the ADA, which prohibits State and local governments from discriminating on the basis of disability;
d. Section 427 of the General Education Provisions Act; and
e. Maryland Anti-Discrimination laws;

The Regional Director of the Baltimore City Department of Rehabilitation Services of the Maryland State Department of Education is a member of the Baltimore Workforce Development Board and the Youth Committee. He also chairs the Systems Building/Service Provider subcommittee of the Youth Committee that coordinates technical assistance opportunities for the youth service providers. Additionally, information regarding federal and state policy and guest speakers sharing equipment to assist those with disabilities is shared from quarterly meetings and communication from the DLLR Disability and Youth Services Coordinator in the Division of Workforce Development and Adult Learning.

The Regional Director of the Baltimore City Department of Rehabilitation Services of the Maryland State Department of Education is also participating in WIOA American Job Center partner meetings. With his guidance; MOED will fully comply with Section 188 and the Americans with Disabilities Act (ADA) regarding physical and programmatic accessibility. As part of compliance, MOED will conduct an annual review of the American Job Center.

American Job Centers and satellite locations deliver WIOA programs and activities in a manner that makes services readily accessible to qualified individuals with disabilities.

MOED staff and partners will have the education, training, and experience (skill, ability, and knowledge) to perform assigned duties regarding nondiscrimination and equality of opportunity for persons with disabilities. MOED believes that these actions help ensure that communications with individuals with disabilities are as effective and equal to communications with non-disabled individuals.

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

The MOED expects that One-Stop Partners will comply with Section 121 (b) (1) (A) to: (1) Provide access through the One-Stop delivery system to such programs or activities carried out by the One-Stop, including making career services as described in section 134 (c) (2) applicable to the program or activities available in the One-Stop centers and any other appropriate locations, (2) use a portion of the funds available for programs and activities to maintain the One-Stop delivery system, including paying infrastructure costs associated with One-Stop centers, (3) enter into a Memoranda of Understanding and Resource Sharing Agreement with the local board relating to the operation of the One-Stop system, and (4) participate in the operation of the One-Stop system consistent with the terms of the MOU, the requirements of WIOA and the requirements of Federal laws authorizing the programs or activities.

Core Partners

The One-Stop Partners and representative for each are:

1) Programs authorized under Title I of the Workforce Innovation and Opportunity Act
   Mayor's Office of Employment Development
   Jason Perkins-Cohen, Director

2) Programs Authorized under Title I - Job Corps Maryland Job Corps Adams and Associates, Inc.
   Rodney Butler, Regional Executive Director

3) Wagner-Peyser Act Programs Department of Labor Licensing and Regulations
Kelly M. Schulz, Secretary

4) Programs authorized under Title I of the Rehabilitation Act of 1973
Maryland State Department of Education Division of Rehabilitative Services
Suzanne R. Page, Assistant State Superintendent

5) Activities authorized under Title V of the Older American's Act of 1965
Maryland State Department of Labor Licensing and Regulations
Kelly M. Schulz, Secretary

Senior Service America, Inc.
Marta Ames, Deputy Director

6) Post-Secondary Vocational education activities authorized under Carl D. Perkins Vocational and Applied Technology Education Act

Baltimore City Community College
Dr. Gordon F. May, President

7) Activities authorized under Chapter 2 of Title II of the Trade Act of 1974
Department of Labor, Licensing and Regulation
Kelly M. Schulz, Secretary

8) Veteran's activities authorized under Chapter 41 of Title 38 United States Code
Department of Labor, Licensing and Regulation; Veteran’s Services
Kelly M. Schulz, Secretary

9) Employment and training activities carried out under the Community Services Block Grant Act
Housing and Community Development
Mayor’s Office of Human Services Community Action Centers
Jacquelyn Duval-Harvey, Ph.D, Director

City of Baltimore Housing and Community Development
Reginald Scriber, Deputy Commissioner

10) Employment and training activities carried out by the
Department of Housing and Urban Development Housing Authority of Baltimore City
Paul Graziano, Executive Director

11) Programs authorized under State Unemployment Compensation Laws
Department of Labor, Licensing and Regulation Unemployment Insurance
Kelly M. Schulz, Secretary

12) Programs authorized under Title II of the Workforce Innovation and Opportunity Act (adult basic education and literacy training)

Baltimore City Community College
Dr. Gordon F. May, President

Strong City Baltimore
Karen Stokes, CEO

Learning is for Tomorrow, Inc.
Mark K. Pettis, M.Ed., CMPI, Executive Director

South Baltimore Learning Center
Tanya Terrell, Executive Director

13) Programs authorized underpart A of title IV of the Social Security Act (42 U.S.C. 601 et seq.)
State of Maryland, Department of Human Resources, Baltimore City Department of Social Services
Molly Tierney, Director

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

The Individual Training Account (ITA) strategy equips jobseekers with the skills to compete in the local economy. *As defined by WIOA, Individual Training Accounts are for an individual who seeks training services, is WIOA eligible (see Section 3.K) may, in consultant with a career planner, select an eligible provider of training services from a list of providers deemed eligible by the State of Maryland.* For residents deemed suited for an ITA, the training can help achieve the customer's long term success and career attainment by helping them acquire in-demand marketable skills to successfully compete in the local labor market at a sustainable wage. Accordingly, all customers who are in need of training begin the process with an interest and aptitude assessment, and participation in a Training Strategies Workshop. The ITA initiative also includes the identification and implementation of an action plan to remove or stabilize Baltimore City resident's employment and training related barriers.

Customers deemed appropriate to access training through the ITA process are referred to the ITA orientation. The orientation provides customers with in-depth information about the ITA process, policies and application requirements. The curriculum also introduces the resources available to them to facilitate their decision making process. As part of the orientation, information is provided regarding the Pell Grant process as well as other resources for financial aid by a partner representative out-stationed at the One-Stop from The Maryland Educational Opportunity Commission (MEOC). The MEOC staff also provide individualized assistance to customers in the completion and submission of the Pell Grant application.

To reinforce the information provided in the orientation, an ITA application packet is provided to each customer. The application process requires customers to justify that their career choice is in an occupation/industry with high growth projections (20% +). Using current labor market information, customers thoroughly research the demands, entry requirements, salary potential and certification requirements of their career choice, compare the performance and ancillary services of chosen vendors, and research job opportunities.

The BWDB set the current cap for ITA vouchers at $3,000, allowing for the consideration of exceptions based on an individual's documented need and circumstances that would prevent them from preparing for a high demand occupation. Generally, training should be completed within one year.

Customers will only be approved for the actual cost of the training requested once PELL grants have been exhausted. If a customer has been enrolled in any MOED funded training program during the past three (3) years, they will not be eligible for any further training. Exceptions may be entertained using the criteria outlined in the local procedural plan which states that exceptions may be made for laid off workers who have received previous training through MOED, and who are unable to gain employment in the same occupational area. Valid justification for requesting training must be completed by the Career Development Facilitator (CDF) and attached to the application. Final approval lies within the Workforce Operations Management team.

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

During the eligibility determination process, the Career Development Facilitator must determine "priority of service" for all WIOA eligible individuals and document the priority within the application and case notes. MOED has a priority of service protocol in place at all times to ensure those most in need receive training services. Therefore, only those who meet the definition of low income as defined in the MOED Individual Training Account Procedures (100% of the Lower Living Standard), including individuals receiving public assistance, will be eligible to receive tuition funded training with WIOA formula funds. There is no Priority of Service in place for those individuals receiving Career Services.

MOED has a local Policy - **Policy Directive 2015-5 – Priority of Service for Low Income Individuals – Revision 1 for WIOA**. Policy reads:

Priority of service status is established at the time of eligibility determination and does not change during the period of participation. Under federal regulation, priority of service does not apply to dislocated workers.

***First priority**:* Initial priority will be given to:

- Veterans and their spouses who are recipients of public assistance and low-income or basic skills deficient;

The term "low-income individual" means an individual who:

A. receives, or in the past 6 months has received, or is a member of a family that is receiving or in the past 6 months has received, assistance through the Supplemental Nutrition Assistance Program established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), the program of block grants to States for Temporary Assistance for Needy Families (TANF) program under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), or the supplemental security income program established under title XVI of the Social Security Act (42 U.S.C. 1381 et seq.), or State or local income-based public assistance; **or**

B. is in a family with total family income that does not exceed the higher of the poverty line; or 70 percent of the lower living standard income level; **or**

C. is a homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 H. R. 803—12 (42 U.S.C. 14043e–2(6))), or a homeless child or youth (as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))); further defined in the *Barriers to Employment* section below **or**

D. receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.); **or**

E. is a foster child on behalf of whom State or local government payments are made; **or**

F. is an individual with a disability whose own income meets the income requirement of clause, but who is a member of a family whose income does not meet this requirement.

The term 'basic skills deficient'' means an individual who:

A. is a youth, that has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; **or**

B. is a youth or adult, that is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

Second priority: Priority will be given to:

- recipients of public assistance and other low income individuals as defined above; **or**
- individuals who are basic skills deficient as defined above; **or**
- individuals with a barrier to employment as defined by WIOA (see below) and who are otherwise determined eligible for individualized career services or training services

The term "individuals with a barrier to employment''means a member of (one) 1 or more of the following populations:

A. Displaced homemakers defined as a participant who has been providing unpaid services to family members in the home and who:

(A) (i) has been dependent on the income of another family member but is no longer supported by that income; **or**

(ii) is the dependent spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of title 10, United States Code) and whose family income is significantly reduced because of a deployment (as defined in section 991(b) of title 10, United States Code, or pursuant to paragraph (4) of such section), a call or order to active duty pursuant to a provision of law referred to in section

101(a)(13)(B) of title 10, United States Code, a permanent change of station, or the service-connected (as defined in section 101(16) of title 38, United States Code) death or disability of the member; **and**

(B) is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

B. Indians, Alaska Natives, and Native Hawaiians, as such terms are defined in section 166.

C. Individuals with disabilities, including youth who are individuals with disabilities.

D. Older individuals. (age 55 or older)

E. Ex-offenders defined as a participant who either:

(a) has been subject to any stage of the criminal justice process for committing a status offense or delinquent act, **or**

(b) requires assistance in overcoming barriers to employment resulting from a record of arrest or conviction for committing delinquent acts, such as crimes against persons, crimes against property, status offenses, or other crimes.

F. Homeless individuals defined as:

(a) Lacks a fixed, regular, and adequate nighttime residence; this includes an individual who:

(i) shares the housing of other persons due to loss of housing, economic hardship, or a similar reason;

(ii) lives in a motel, hotel, trailer park, or campground due to a lack of alternative adequate accommodations;

(iii) lives in an emergency or transitional shelter;

(iv) is abandoned in a hospital; or

(v) awaits foster care placement;

(b) Has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, such as a car, park, abandoned building, bus or train station, airport, or camping ground;

(c) Is a migratory child who in the preceding 36 months was required to move from one school district to another due to changes in the parent‘s or parent‘s spouse‘s seasonal employment in agriculture, dairy, or fishing work; or

(d) Is under 18 years of age and absents himself or herself from home or place of legal residence without the permission of his or her family (i.e., runaway youth).

G. Youth who are in or have aged out of the foster care system.

H. Individuals who are English language learners defined as a person who has limited ability in speaking, reading, writing or understanding the English language and also meets at least one of the following two conditions:

(a) his or her native language is a language other than English, or

(b) he or she lives in a family or community environment where a language other than English is the dominant language; **and**

individuals who have low levels of literacy defined as a participant who is unable to read, write, and speak in English; compute and solve problems at levels of proficiency necessary to function on the job, in the family of the participant, or in society; **or** individuals facing substantial cultural barriers defined as a participant who perceives him or herself as possessing attitudes, beliefs, customs or practices that influence a way of thinking, acting or working that may serve as a hindrance to employment.

I. Eligible migrant and seasonal farmworkers, as defined in section 167(i).
J. Individuals within 2 years of exhausting lifetime eligibility under TANF (part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.)).
K. Single parents (including single pregnant women and non-custodial parents).
L. Individuals who are unemployed including long-term unemployed individuals defined as a participant has been unemployed for 27 or more consecutive weeks at program entry.
M. Individuals facing substantial cultural barriers defined as barriers that exist when a participant perceives him or herself as possessing attitudes, beliefs, customs or practices that influence a way of thinking, acting, or working that may serve as a hindrance to employment.
N. Individuals who have low levels of literacy/ basic skills deficient defined as:
   (a) an individual who is a youth that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test : OR
   (b) an individual who is a youth or adult, that the individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.
O. Individuals without a High School Diploma
P. Such other groups as the Governor involved determines to have barriers to employment.

All definitions listed for Barrier to Employment have been taken from the Workforce Innovation and Opportunity Act- Participant Individual Record Layout (ETA 2015-0007-003 (2)), the data collection template proposed in OMB Control No.1205-0NEW, as required by section 116(d) of the WIOA Act, and the Maryland Workforce Innovation and Opportunity Act State Plan defining Target Populations: Individuals with Barriers to Employment and Priority Populations.

Third priority shall be given to veterans and other covered persons who are eligible for individualized career or training services (based on TEGL 3-15). The terms "Veterans" and "other covered persons" are defined in DLLR Policy Issuance 2016-4 – Employment Services for Veterans. In accordance with the Jobs for Veterans Act (P.L. 107-288) (38 USC 4215(a)), the Veterans' Benefits, Health Care, and Technology Act 2006 (P.L. 109-461), and 20 CRF Part 1010, published on December 19, 2008, MOED will ensure that eligible veterans and eligible spouses are identified at the point of entry, are aware of their entitlement of priority of service and are given an opportunity to take full advantage of priority of service and the full array of employment, training and placement services, consistent with requirements outlined in Training and Employment Guidance Letter 10- 09 and Veterans' Program Letter 07-09. The initial assessment and registration documents must identify veteran status. Veterans and their eligible spouses advancing to individualized career services and training services must document their veteran status by supplying a copy of their DD214 Copy 4, "Veteran's Certificate of Release or Discharge from Active Duty", Letter from the US Department of Veteran Affairs (VA) that certifies Veteran Status, or other official source document approved by the Local Workforce Development Area Director, which can be cross-matched with available Veterans data.

Fourth priority*:* MOED has a priority of service protocol in place at all times to ensure those most in need receive training services. Therefore, only those who meet the definition of low income as defined in the MOED Individual Training Account Procedures (100% of the Lower Living Standard), including those individuals receiving public assistance, will be eligible to receive tuition funded training with WIOA formula funds.

Additionally, priority may be given to special populations as a result of funding specific for that special population.

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

Incumbent worker training is a new opportunity presented with WIOA, and Baltimore City intends to allocate up to 10 percent of its adult and dislocated worker training funds for this purpose. This provides an opportunity to partner with businesses to support career pathways for workers and to create more entry-level positions for job seekers. Building on the Maryland Business Works model and consistent with the new WIOA law, funds will be made available as a supplement to the state's Maryland Business Works and will follow the eligibility and target criteria that the state has set, primarily targeting small businesses with 100 employees or fewer, businesses providing in-demand products or services, or businesses facing potential layoffs. Funds will be available to businesses located within Baltimore City and the training cap per specific trainee will be $4500 with businesses responsible for 50 percent of the training costs. It is expected that the program will be phased-in during the first year of the local WIOA Plan.

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

The delivery of One-Stop services is enhanced through regular staff development training for WIOA and One-Stop partners. Continuous staff development in customer service, diversity and sensitivity training will equip staff with the knowledge and skills to provide services to all customers.

Additionally, regular cross-training sessions will increase staff capacity, expertise and efficiency and assist to enrich the customer experience. Moreover, cross-training ensures WIOA and One-Stop partners have a solid understanding of each program requirements and supports in the delivery of seamless quality service to all customers. Cross training topics include up skilling staff in the use and functions of the newest versions of the MWE, policy changes based on DLLR Policy Issuances or local guidance documents, and implementation changes as final WIOA guidance is released. Training for special populations served within the AJC includes documenting refugees and asylees as legal immigrants in the United States, and providing assistance to individuals with disabilities. The MOED schedules and/or coordinate quarterly trainings for staff.

The One-Stop staff encourages customers to complete a customer satisfaction survey to provide feedback on their experience at the One-Stop Centers. The Labor Exchange Administrator and Program Managers review the surveys to monitor the customer experience and effectiveness of services.

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

This Section should include –

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

The Baltimore Workforce Development Board wants to make available as many options for Individualized Career Services and Training as possible to allow a tailored unique experience based on client needs. This supports our customer-centric model. The local workforce system will not prescribe to “a one size fits all” mentality. The toolbox of opportunities will be extensive providing front-line workers and integrated business service team members a chance to individualize the workforce system experience and create a meaningful plan of action.

The assessment of the type and availability of these employment and training services was created through a service matrix by the workforce partners and therefore the services will not be the sole responsibility of the title I Adult and Dislocated Worker provider. In some instances, the services are Basic Career Services that one or more partner agencies may be providing. In other instances, such as Adult Education and Literacy, a Core Program Partner will provide the service. Adults and Dislocated Workers may be co-enrolled across partner programs to leverage resources and expand the menu options.

The MOED provides high quality Career Services to assist job seekers with acquiring in-demand skills to compete for in-demand jobs.

Some of the employment and training activities will be targeted to:

- Provide job seekers with the skills and credentials to compete and secure employment at a self-sustaining wage;
- Help job seekers access supportive services to address barriers to employment such as homelessness, a criminal background, child support,, and/or adult education;
- Provide businesses and employers with skilled talent and access to other human resource services to grow their business; and
- Meet regularly with One-Stop partners to identify best practices and strategies that would work better to continuously improve local one-stop operations.

There are three types of "career services" available for adults and dislocated workers within American Jobs Center: basic career services, individualized career services, and follow-up services. These services may be provided in any order as sequence of service is not required which provides staff the flexibility to target services to meet the needs of the customer.

Basic Career Services
Residents may receive basic career services. Staff will:

- Determine eligibility for WIOA Adult and Dislocated worker services;
- Assess skills including literacy, and English language proficiency;
- Provide labor exchange services and information on in-demand industry sectors including accurate information about local, regional, and national labor market areas, job vacancy listings; information on job skills necessary to obtain the vacant jobs listed;

- Offer job search and placement assistance;
- Refer and coordinate supportive services and other workforce programs;
- Provide performance and program cost information on eligible providers of training services by program and type of providers; and
- Assist in establishing eligibility for financial aid assistance for training and education programs not provided under WIOA.

Individualized Career Services
If one-stop center staff determines that individualized career services are appropriate for an individual to obtain or retain employment, staff will:

- Conduct comprehensive assessments of the skills and the service needs to help the resident obtain high wage employment;
- Develop an Individual Employment Plan to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve his or her employment goals;
- Provide individual counseling and mentoring;
- Offer career planning (e.g. case management);
- Provide job readiness preparation that provides basic academic skills, critical thinking skills, digital literacy, and self- management skills, including competencies in utilizing resources;
- Connect customers to financial literacy services;
- Refer to Occupational skills training;
- Offer Customized Training or On-the-job training;
- Offer incumbent worker training; and/or
- Refer customers to English language acquisition and integrated education and training programs.

Follow-up Services
MOED provides follow-up services to all residents deemed eligible for WIOA Individualized or Training Services who are placed in unsubsidized employment, for up to 12 months after the first day of employment. Follow up services may include any of the following:

- Referral to Community Resources
- Referral to Medical Services
- Tracking Progress on the Job
- Work Related Peer Support Group
- Assistance securing better paying job
- Career development and further education planning
- Assistance with Job/Work Related Problems
- Adult Mentoring/Tutoring
- Leadership Development or
- Other Follow-up Service, not classified.

Staff will contact residents monthly, document all progress in the Maryland Workforce Exchange (MWE), place notes in the customer case file. If the participant obtains employment, staff will obtain and maintain documentation of the job in the participant's record in MWE.

(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).

Outplacement assistance is available to businesses that are forced to downsize their workforce or shut down operations. Using a coordinated, comprehensive approach, the MOED Rapid Response team assists employees affected by mass layoffs and company shutdowns to quickly reenter the workforce by offering access to job prep workshops, academic skills update, occupational skills training/retraining, unemployment insurance information, job placement referrals and many other services. MOED Outplacement services assist the workers affected in transitioning from unemployment to re-employment in an effective and efficient manner. MOED provides dislocated workers with assistance regarding unemployment information, and information and access to the following workforce development activities: re-employment workshops, career counseling, job search workshops and instruction, assessment of skills, job readiness services (resume prep, interviewing techniques) occupational skills training, employment opportunities and placement assistance.

Rapid Response activities are a coordinated effort between the employer, affected workers, DLLR Dislocation Services Unit, and MOED One-Stop staff. The team works with employers and employee representative(s) to reduce the disruptions on businesses, affected workers, and communities that are impacted by job loss. The MOED has worked well with Worker Adjustment and Retraining Notification (WARN) and non-WARN businesses and employees to maximize resources in times of job loss.

Rapid Response Contacts

Yvette Clark, Interim Manager, Business Services
Mayor's Office of Employment Development
Business Services
3001 E. Madison Street
Baltimore, Maryland 21205
443-984-3014
yclark@oedworks.com

Rosemary Woren,
Senior Program Development Specialist
Mayor's Office of Employment Development
Business Services
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(C) A description and assessment of the type and availability of youth workforce development activities in the Local Area, including activities for youth who are individuals with disabilities, which description and assessment shall include an identification of successful models of such youth workforce investment activities;

MOED's Youth Services Division provides a menu of workforce development activities for youth 16-24 years of age. In keeping with Education Article 7-301, Annotated Code of Maryland, as of July 1, 2015, the compulsory public school attendance age changed from 16 to age 17 therefore out of school programs will only serve youth age 17 -24. Effective July 1, 2017 the age for compulsory public school attendance will change to 18 years of age, again changing the eligibility age for out of school participants to age 18. Our in-school WIOA provider works with youth 16-21 years of age. Youth are eligible for job readiness training, occupational skills training, internships, job shadowings, career fairs, field trips to post-secondary schools and opportunities to apply for apprenticeships.

Upon enrollment, each youth receives academic, occupational and life skills assessment (Ansel-Casey, TABE, Career Scope, etc.). The analyses of these assessments help the selected service provider develop a customized plan with the youth to ensure that the appropriate academic services and supports are provided. Currently, level 9 of the TABE is being administered.

The WIOA youth providers (Bon Secours, Career Academy, Civic Works/ YouthBuild, Healthcare Careers Alliance, New Pathways, Incorporated) listed in Section 4 (O) have the choice of several occupational interest and aptitude tests to offer youth. These are a combination of electronic, web-based and paper products. The appropriate test is selected based on the counselor's initial assessment of the youth's ability, education level and desire to determine a career area. Once identified, the youth is provided with opportunities for exposure and training in the career.

MOED's Youth Services Division has a very close partnership with DORS. This partnership allows WIOA service providers and our Youth Opportunity program an opportunity to refer youth who might have undiagnosed learning disabilities. In addition, DORS actively participates in the Mayor's summer jobs initiative Youthworks.

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

The Baltimore Workforce Development Board's Business Engagement Committee will convene workforce stakeholders to further develop career pathways to include basics skills, technical training and practicums or experiential learning opportunities. While classroom instruction provides solid foundational support, the practical application of skills, especially those skills identified by employers, will improve outcomes for individuals with barriers to employment. Incorporating and utilizing work-based training options allowable under WIOA like internships, job shadowing, and transitional jobs will provide a workplace experience that can advance overall learning.

The Board intends to begin to coordinate sector strategies in the spring of 2017 by convening with industry, educational providers and other stakeholders by sector. During these convenings, the Board will identify labor market needs, the skills and credentials required and the career pathway for each of the occupations most in demand. Once needs are identified, local business will weigh in on curriculum and resources will be identified to support training.

The MOED intends to support career pathways as a method through which workers can move up the career ladder by completing short-term certificate training programs that lead to greater credentials and upward mobility in their career of choice. This laddering effect, over time, produces a better trained

and qualified workforce for local employers, as well as higher wages for employees, which, in turn, creates a positive economic impact on local communities.

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

The Mayor's Office of Employment Development's supportive services are designed to remedy barriers that might impede a customer's ability to participate in One-Stop Center activities or link them to resources provided by partner agencies. To maximize resources and avoid duplication of services, MOED has developed partnerships with a wide range of agencies and community based organizations to link customers to supportive services such as clothing closets, child care support services, substance abuse treatment, temporary housing, and emergency food. Fundamental to providing intensive employment and training services is the ability to assist customers with referrals to supportive services. The AJC staff regularly mobilizes referral resources to address challenges that may inhibit one's ability to obtain and retain employment. Staff are trained to identify and define the problem and develop a customized plan so that customers can get the assistance they need. This plan is then integrated into the customer's Individual Employment Plan (IEP).

These strategies include:

• Transportation Assistance: The Mayor's Office of Employment Development has forged successful relationships with several entities that provide transportation assistance to individuals seeking employment, and to those who have obtained employment that is not easily accessible by public transportation.

• Crisis Intervention: Career Development Facilitators (CDF's) at the respective One-Stop Career Center locations are trained to conduct a complete assessment of all customers. This includes identifying crises that may affect the participant's ability to be successful in the program. This may include referral to agencies dealing with problems of domestic violence, housing, health, budgeting, and so forth. Regular staff development activities include presentations from professionals knowledgeable in these areas. CDF's use the information obtained from the staff development activities to assist with the identification of potential abusers as well as to make referrals to available services for those in need.

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

For WIOA Title I Adult program, Baltimore City will provide priority of service to individuals in the following target populations, in accordance with the Act, the State Plan, and the Local Plan.

*Target Populations: Individuals with Barriers to Employment
Displaced Homemakers
Eligible migrant and seasonal farmworkers
Ex-offenders
Homeless individuals
Individuals facing substantial cultural barriers
Individuals with disabilities, including youth with disabilities
Individuals within two years of exhausting lifetime eligibility under Part A of the Social Security Act[4]
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
Youth who are in or have aged out of the foster care system

Baltimore City is committed to ensuring target populations are able to access the WIOA services on a priority basis. For the WIOA Title I Adult program, priority will be given in the following order further defined above in Section 3 K:

Priority of Service for the WIOA Title I Adult Program	
First Priority	Veterans and eligible spouses[5] who are also low-income,[6] recipients of public assistance and/or basic skills deficient
Second Priority	Individuals who are meet criteria to be considered a target population* (including veterans)
Third Priority	Eligible spouses who did not meet "first priority" conditions
Fourth Priority	Individuals who are not veterans and do not meet criteria to be considered a target population

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

Dislocated worker funds will be utilized to provide services to individuals who lost jobs due to plant closures, company downsizing, or some other significant change in market conditions. In most cases, eligible workers are unlikely to return to their previous occupations, and they are eligible or have exhausted unemployment compensation. Dislocated worker funds will support WIOA case management; skills development including career pathways, and occupational training; and OJT/ customized training. These services will assist dislocated workers in acquiring in-demand skills required for obtaining employment in the current job market.

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

Definitions of Self Sufficiency for Employed Adults and Dislocated Workers:
An annual wage greater than or equal to 100% of the Lower Living standard. Employed

individuals may qualify for individualized career services and re-training services if they lack the skills to retain or gain employment at a sustainable wage. Incumbent workers who earn wages above self-sufficiency level are eligible to **receive WIOA funded incumbent worker services as defined by WIOA regulations (Subpart F—Work-based Training 680.700 page 20728)**

(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.

An applicant may be considered **"unlikely to return to previous industry or occupation"** if one of the following conditions are met:

- current labor market data reflects a lack of employment opportunities in the industry or occupation, or
- occupation is listed as one of the area's or region's declining industries or occupations, or
- occupation has changed such that the customer no longer has the skills needed for the occupation, or
- obsolete or inadequate job skills for reentry into the former occupation or industry, or
- lacks appropriate industry and/or national certification or accreditation for re-hire or re-employment in industry/occupation of lay-off, or
- industry of occupation has been subject to, or is expected to be subject to, repeated layoffs or frequent business closings, or
- age and/or medical condition is such that the customer can no longer perform his/her previous occupation, or
- insufficient education for reentry into the former occupation or industry.

(J) A description of how the Local Board will interpret and document eligibility criteria for "requires additional assistance to complete an educational program or to secure or hold employment" as set forth in the State's Youth Policy and WIOA Sections 129(a)(1)(B)(iii)(VII) and (a)(1)(C)(iv)(VII);

Youth living in an urban environment such as Baltimore City experience a variety of outside influences that may make it difficult for them to remain in traditional high school or to secure and maintain employment. These factors include higher rates of crime, violence, drug traffic, substandard housing and challenges within the family, which make it more difficult to gain the skills and promote the interest and attitudes needed to succeed in the labor force.

In December 2013, the Youth Council of the Baltimore Workforce Investment Board approved the following additional barriers for youth to fall under the broader criteria for "requires additional assistance to complete an educational program or to secure or hold employment". After review, this criteria will remain in effect and agrees with the State's Youth Policy and WIOA Sections 129(a)(1)(B)(iii)(VII) and (a)(1)(C)(iv)(VII):

- limited/ non- existent employment skills based on the participant's work history and documented in the Individualized Service Strategy (ISS)

- high school graduate or student without any clear career choices or no significant work history (not more than six consecutive months with the same employer) documented on the ISS or applicant statement
- high school graduate or student without any significant work history or a poor work history (to include no work history); or has been fired from a job in the last six calendar months documented on the ISS or applicant statement
- student in an alternative academic program in need of a high school diploma/GED documented by Baltimore City Public School (BCPS) transfer letter or attendance letter from a BCPS alternative school
- reside in high crime and or poverty area based on zipcode or census tract as documented through address compared to high crime or poverty area list
- living in a single parent household and/or with a disabled parent as disclosed on an applicant statement, tax form, social services or social security documents, or disability documents
- individual with disabilities (including learning disabilities and/or mental health issues) as documented through BCPS Individual Education Plan or other medical documentation

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

The customer's need for training is based on a comprehensive assessment of work history, skills, education level, and aptitude and career interest. The need for training is documented in the Individual Employment Plan.

The IEP is an ongoing strategy jointly developed by the customer and the Career Development Facilitator (CDF) that identifies the customer's employment goals, the appropriate achievement objectives, and the appropriate combination of services for the participant to achieve their employment goals. The IEP is developed as a result of the Comprehensive Assessment and is flexible and on-going based on the participant's needs.

MOED has a local policy - **Policy Directive 2015-1 – Individual Employment Plans** – outlining the use of the Individual Employment Plan including a section specifically designed for capturing the justification for training. The policy reads:

Justification for Training

Under WIOA SEC 134 (C) (3) (A), training services may be made available to employed and unemployed adults and dislocated workers without sequencing of services.

Section 680.220 of the Proposed Federal Register states "The case file must contain a determination of need for training services as determined through the interview, evaluation, or assessment, and career planning informed by labor market information and training provider performance information, or through any other career service received." This justification must be documented on the IEP.

Examples of Justification of Training include:

- Customer is unemployed and lacks occupational skills required to obtain employment.
- Customer is unemployed and requires additional certification to obtain employment in their chosen

occupation.
• Customer is unemployed and needs to up-grade his or her skills to obtain employment in their chosen occupation.
• Customer is unemployed but lacks marketable skills to obtain employment.
• Customer is employed and requires skills upgrading to obtain or retain employment that leads to self-sufficiency.
• Customer is employed and requires additional certification(s) to obtain or retain employment that leads to self-sufficiency.

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

The Selected Youth Service Providers will offer a combination of the WIOA program elements listed below. Current service providers are described in Section 4 (O). During the WIOA Service Provider Orientation, monthly meetings and informational emails, resources are shared that can assist the providers in delivering or identifying services. Some providers have contracted with therapists, counselors and other organizations to provide the program elements not offered on site.

1. Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized post-secondary credential;

2. Alternative secondary school services, or dropout recovery services, as appropriate;
    a. Collaboration with Baltimore City Public Schools Alternative Options /schools (which includes the Career Academy)
    b. Partnership with Job Corps
    c. Baltimore City Community College early enrollment program

3. Paid and unpaid work experiences that have academic and occupational education as a component of the work experience, which may include the following types of work experiences: summer employment opportunities and other employment opportunities available through the school year; pre-apprenticeship programs; internships and job shadowing; and on-the-job training opportunities;
    a. Internships, summer employment opportunities have been incorporated into our year round strategy for preparing youth for careers. Such summer opportunities include: YouthWorks-Private Sector (Hire One Youth Initiative) and public funded summer jobs program and community based work and learning activities

4. Occupational skills training, which includes priority consideration for training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the local area involved, if the BWDB Youth Committee determines that the programs meet the quality criteria described.
    a. Office Administration including Microsoft Office Suite
    b. National Retail Federation Certification
    c. Entry level health related occupations training in Patient Transporter, Medical Records Clerk, Dietary Aide, Linen and Laundry Service Worker, Distribution Clerk, Clerical Associate, Environmental Services Worker, Client Services Representative

d. The HBI Pact
e. Retail Services (Customer Service and Sales Certification)
f. Certification in Allied Health
g. Biotechnical Institute of Maryland (entry-level bio technician certification)

5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;

6. Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors;
    a. Student government
    b. BWDB Youth Council members
    c. Community Service Projects
    d. Volunteer activities

7. Supportive services;
    a. Mentoring
    b. Housing Assistance
    c. Daycare Assistance
    d. Interview Clothes
    e. Peer-to-Peer Mentoring
    f. Clothing Assistance

8. Adult mentoring for a duration of at least 12 months that may occur both during and after program participation;
    a. Advisory board members
    b. Community volunteers

9. Follow-up services for not less than 12 months after the completion of participation;
    a. Career Seminars/Job Fairs
    b. Social Media
    c. Interaction with Career Navigator
    d. Bi-monthly and Quarterly Meetings

10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth;
    a. Career awareness & Interest/skills assessment
    b. One-Stop Career Services
    c. Case Management
    d. Referrals (mental health, substance abuse)

11. Financial literacy education;
    a. Partnerships with are financial institutions and credit unions

12. Entrepreneurship skills training;
    a. Partner closely with Junior Achievement of Maryland to provide the knowledge and skills participants need to know to own their economic success, plan for their future and make smart

academic and economic choices. They provide relevant hands-on experience in financial literacy, work readiness and entrepreneurship.

13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and

14. Activities that help youth prepare for and transition to 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;

All WIOA Youth Service Providers are required to have a summer jobs component that is supported by 20% of youth funds designated for work-based readiness. The RFP distributed for WIOA youth programs discusses the 20% funding criteria and the response must include a provision which ensures 20% of youth funds are used for work-based training activities. Although each awarded WIOA provider is required to register youth in the City of Baltimore's summer jobs program, providers have developed internships, occupational skills training, and subsidized employment opportunities that meet the definition of work-based training activities and that will provide critical hands on training to allow successful completers to excel in the workplace. Summer employment opportunities are made available to any WIOA youth who has not obtained unsubsidized employment once the summer jobs programs begins. For programs that do not provide stipends, the summer employment serves as an incentive for participants while they work.

During quarterly reviews, the Youth Council will review expenditures and planned activities to ensure programs are on target to meet or exceed the 20% expenditure of youth funds for work-based training activities.

(N) A description of the Local Board's plan to serve 75%+ out of school youth and identify specific steps that have been taken to meet this new goal; and

Baltimore has dedicated significant resources to out of school youth for decades. When the Baltimore Workforce Investment Board formed the Youth Council in 1999, its primary focus was on older youth/out of school because several successful in-school programs were already established. Over the years as the number of Opportunity Youth has grown, MOED has emphasized that and continues to ensure its service providers serve out of school youth.

The WIOA Youth RFP process specifically outlines the need to serve 75% out of school youth. Four programs were selected through the RFP process to specifically serve out of school youth and one program was selected to serve in school youth. A youth Career Navigator is housed at each MOED Career Center to meet with out of school youth and provide program referrals.

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

The organizations listed below provide services to youth 16-24 years of age that live in Baltimore City. Interested young adults must be committed to completing the enrollment process and all program activities, and attend services each day. Each program provides a small, nurturing learning environment with qualified staff to assist with life skills, employability skills, occupational skills training, and career development.

BON SECOURS COMMUNITY WORKS HEALTH CAREER TRAINING provides selected participants an opportunity to partner with IT Works Learning Center to receive CNA/GNA training as well as attending the Pathway to Success job readiness and life skills training.

CAREER ACADEMY/ MAYOR'S OFFICE OF EMPLOYMENT DEVELOPMENT is an alternative public high school providing academic, youth development and career awareness services to students in Baltimore City. The Career Academy represents an exchange and leveraging of resources between the Mayor's Office of Employment Development, the Baltimore City Public Schools, and the Job Corps Woodstock Center. The Career Academy currently offers a Diploma Plus model, which allows students the opportunity to earn a regular high school diploma, as well as college credits, while developing career skills through internship experiences.

CIVIC WORKS/YOUTH BUILD assists young adults to complete their high school education while providing on-site construction training experiences that provide housing for low-income families. The program fosters job readiness and leadership skills, and offers opportunities for participants to connect with apprenticeship programs and full-time employment in jobs that pay a living wage.

HEALTHCARE CAREERS ALLIANCE is comprised of Sinai Hospital of Baltimore, VSP, and Civic Works. It offers participants a life-changing opportunity to train for careers in healthcare, Baltimore's largest economic sector. Participants receive certification and on-the-job training as clerical associates, client service representatives, nursing assistants, dietary aides, distribution clerks, environmental service workers, linen and laundry service workers, medical records clerks, medical transporters and patient transporters.

NEW PATHWAYS, INCORPORATED/1-2-3-GO! WAREHOUSE LOGISTIC TRAINING is an exciting opportunity that includes a full range of preparation services, training, and job placement support leading to a career as a Certified Logistics Associate as well as OSHA and Forklift Operating certification. The Community College of Baltimore County will provide the training.

Note: In keeping with Education Article 7-301, Annotated Code of Maryland, as of July 1, 2015, the compulsory public school attendance age changed from 16 to age 17 therefore out of school programs will only serve youth age 17-24. Effective July 1, 2017 the age for compulsory public school attendance will change to 18 years of age, again changing the eligibility age for out of school participants to age 18.

(P) A description of how the Local Board will provide basic and individualized career services to customers. The description should explain how individualized career services will be coordinated across program/partners in the American Job Centers, including Vocational Rehabilitation, TANF, and Adult Education and Literacy activities. This description should specify how the Local Area will coordinate with these programs to prevent duplication and improve services to customers.

When it is determined that basic and individualized career services are appropriate for a customer to obtain or retain employment, these services will be made available through the entire AJC staff. The AJC staff will coordinate and integrate services by functions rather than specific programs, if appropriate, and strive to improve communication, capacity building, and cross trainings. Service integration will focus on serving all customers seamlessly, including targeted populations, by providing a full range of services staffed by cross trained teams.

Coordination and the reduction of duplication of services is tracked through the Maryland Workforce Exchange (where appropriate), which directly tracks the labor exchange for all job seekers services, employer services, and training services under WIOA and TAA (Trade Adjustment Act) as well as Veterans, Reemployment Services and Eligibility Assessment and Reemployment Opportunity (RESEA) and ROW services. AJC staff with access to the Maryland Workforce Exchange (MWE) will maintain and monitor the delivery of individualized career services in the system. Although, programs such as Temporary Assistance to Needy Families (TANF), and Supplemental Nutrition Assistance Program (SNAP) are tracked in an alternate management information system, regular communication across programs and center staff will assist to prevent duplication and provide a quality customer experience.

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

Follow-up services are conducted over a one year period as mandated by WIOA for both youth and adults. Youth Service providers & assigned MOED staff provide active case management to participants for at least one year after exiting the program. The relationship developed by the provider and participant often exists beyond the required one year of follow-up. Services may include assessment/re-assessment, mailers and notices of job fairs, additional training opportunities, support services, employment and education retention counseling, life skills/problem solving advocacy, services to support continued success for the participant or other program activities provided during the service period. Participants receiving follow-up services who work at the occupational skills training location often are asked to serve as a mentor to more recently engaged participants. They assist with recruitment, share information about program benefits and provide on the job support.

For the WIOA Adults and Dislocated Workers, follow-up services are provided as appropriate for participants who are placed in unsubsidized employment and continue for up to 12 months after job placement and/or participants that exit the program. Follow-up services are delivered monthly and include services such as mailers, phone calls, notices of job fairs, financial and literacy workshops, network clubs, special recruitments and job announcements to support career growth.

Follow up services may also include any of the following:

- Referral to Community Resources
- Referral to Medical Services
- Tracking Progress on the Job
- Work Related Peer Support Group
- Assistance securing better paying job
- Career development and further education planning
- Assistance with Job/Work Related Problems
- Adult Mentoring/Tutoring

- Leadership Development
- Other Follow up Service, not classified

Participants are contacted monthly, all contacts and attempts are documented and services provided will be documented in the Maryland Workforce Exchange (MWE) as an activity and noted in the case file. Documentation of new employment will be obtained and placed in the participant's case record and the MWE.

Section 5 – Wagner-Peyser Functions

This Section should include --

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

Through joint WIOA planning meetings, a collaborative model has been developed to provide seamless services to all program customers including Wagner Peyser, Veterans, Unemployment Insurance, Trade Act and WIOA eligible customers. This model includes streamlining and coordinating the operational process and procedures for customer flow and service design within the one-stop system. This has been accomplished through coordinated orientation sessions, outreach, retention services, marketing efforts, targeted workshops, integrated staffing, job development and collaborative management and oversight. Specifically, Job Service staff play a pivotal role in delivering basic career services that include: AJC orientation sessions, workshops, interviewing and screening for job opportunities, assisting customers with MWE registration, assisting with electronic resumes, providing job referrals, connecting customers to labor market information, conducting informal assessments, initiating referrals to individualized career and/or training services. The delivery of services to participants are recorded and tracked in the MWE management system and strongly supports coordination and reduces duplication of services. Job Service and WIOA staff jointly facilitate rapid response activities, both on the job site and in the One-Stop Centers.

Baltimore City job seekers and employers are served in a seamless and customer focused manner. Through a citywide network of One-Stop Career Centers and multiple workforce partners, Baltimore area businesses benefit from MOED's Employ Baltimore strategy that provides services to build and retain a quality workforce. The Business Services division of the Mayor's Office of Employment Development (MOED) coordinates and guides the efforts of business services staff comprised of WIOA, Wagner Peyser, DORS, TANF and Veterans. All staff are trained on a comprehensive menu of human resource services designed to accommodate the needs of business including Customized Training; no cost job posting; outreach and recruitment, prescreening and assessment of applicants, and job matching; tax credit information, job fairs and on-site recruitment and access to labor market information.

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

Unemployment Insurance Claimants are invited by letter to participate in mandated reemployment workshops. Federally funded RESEA (Reemployment Services and Eligibility Assessment) workshops target individuals who recently applied for unemployment insurance, profiled as least likely to exhaust benefits, and focuses on labor market information and center activities. Sixty (60) day follow-up is required by the workshop leader to ensure engagement within center services. State funded ROW (Reemployment Opportunity Workshops) target those individuals who are receiving Unemployment Insurace Benefits. These workshops teach claimants about resume writing techniques, interviewing and job search strategies and job opportunities. Workshop participants also receive an orientation to the center, partner services and training opportunities across the workforce system. Wagner-Peyser staff provides information to individuals requiring assistance with filing claims for unemployment compensation.

Additionally, information on services such as job fairs and training opportunities are posted in the One-Stop centers and disseminated telephonically using the phone tree system and electronically through social media, associated workforce systems and websites.

Outplacement services or Rapid Response Services include on site job readiness workshops (resume writing, interviewing skills, and job search on the internet); labor market information to guide the job search process, and referrals to other Career Center services such as one-on-one meeting with center staff. MOED also conducts mini job fairs for specific dislocated workers and offers training initiatives including OJT and Customized Training which provide hands on work skills with a commitment to hire.

(C) If applicable, 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.

Migrant and seasonal farm workers are not a population typically served by Baltimore City. In the event that there is a migrant or seasonal farm worker in Baltimore City, MOED will stand ready to provide training services consistent with the requirements of Wagner-Peyser.

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

This Section should include --

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

The state plan, consistent with federal WIOA guidelines, requires that as part of the WIOA Title II adult basic education application process, applicants will be required to submit their applications to the local board, which will review the applications for alignment with the local plan. The DLLR Division of Workforce and Adult Education and Literacy Services will provide the BWDB with an opportunity to make recommendations and potentially participate in the proposal review process when scoring the related sections of the applications. Services will:

- align with the skill needs of industries in the economy of the state and/or regional economy involved;
- prepare an individual to be successful in any of a full range of secondary or postsecondary education options, including registered apprenticeships;
- include counseling to support an individual in achieving the individual's education and career goals;
- include, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
- organize education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent possible;
- enable an individual to attain a secondary school diploma or its recognized equivalent and at least 1 recognized postsecondary credential;
- helps an individual enter or advance within a specific occupation or occupational cluster; and
- provide English as a Second language classes to foreign born individuals

The Board will review any Title II proposal and state whether the Title II proposal: (a) aligns with the local plan, or (b) recommends revisions that would lead to alignment with the local plan. The Maryland Department of Labor, Licensing and Regulation (DLLR) will establish a uniform process for each local board to review for alignment applications for Title II funding. (See, WIOA Section 231(c)(2)). The MOED intends to follow the guidance provided by DLLR in reviewing RFP proposals for Title II funds.

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

Through joint planning sessions, the MOED and One-Stop partners developed a "Service Matrix" to coordinate and align workforce and educational services to increase access for individuals. The Service Matrix is a tool to understand the services each partner agency provide and streamline referrals. A referral mechanism and consent form was developed to efficiently refer the customer to partner programs, including the sharing of assessment scores and test results for the adult and dislocated worker populations. The workforce staff will be trained in administering the common assessments utilized by Title II providers.

Adult Provider	Services
Baltimore City Community College	• provide GED and adult basic education classes at the One-Stop Career Center • provide students with information on nontraditional career opportunities • provide students with information on adult apprenticeship programs • provide students with information about One-Stop training opportunities and referrals • assist students to attain a secondary school diploma or its recognized equivalent and at least 1 recognized postsecondary credential; and • offer courses to for students for occupational skills training
LIFT	MOED is coordinating planning sessions
South Baltimore	• provide GED and adult basic education classes • provide information to students on nontraditional career opportunities • provide students with information on adult apprenticeship programs and refer to One-Stop • information on special events focusing on career exploration • provide information about One-Stop training opportunities and refer to the center's point of contact
Strong City	• provide GED and adult basic education classes • setup a kiosk at Strong City with information on training opportunities, career center calendar of events • follow-up with individuals that express interest in MOED services • designate a point of contact to schedule and track cross referrals

The description should include:

- An outline of the agreed upon steps that will be taken to align basic education skills and English language assessments within the local area, including, but not limited to, any Memoranda of Understanding entered into by the workforce development and adult learning partners;

The MOED in coordination with Adult Education providers will assist in the development of a mapping tool that identifies all the local providers, services and English language assessments to increase referrals and connect learners to the provider that can best address their literacy need. Through continuous planning devise a strategy to address low literacy learners without a High School Diploma/GED**.**

The MOED will also plan quarterly meetings with local Adult Education Literacy provider's to

share information and continue the practice of building and aligning basic education and sharing of best practices and success stories.

- 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));

  The MOED in coordination with Adult Education providers plans to develop an intake form that authorizes the release of assessment scores amongst partners.

- 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;

  Workers certified as eligible for TAA (TAA-certified) will be assessed by WIOA staff immediately after accessing One-stop services.

  Effective July 1, 2016, Maryland WIOA Title I local workforce development areas (where required) and WIOA Title II adult education providers are required by DLLR to assess Adult Basic Education (ABE) or Adult Secondary Education (ASE) learners with the:

  - Comprehensive Adult Student Assessment Systems (CASAS); and/or,
  - Tests of Adult Basic Education (TABE).

Approved Assessments	By Who	When
CASAS	Adult Education	Prior to enrollment
TABE	WIOA Career Development Facilitator	After eligibility determination
TABE Complete Language Assessment System-English (TABE/CLAS-E)	Adult Education	
Basic English Skills Test (BEST) Literacy	Adult Education	
BEST Plus	Adult Education	

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

  The Adult Education providers administers the CASAS and/or TABE/CLAS-E to learners requiring Adult Basic Education, GED and/or English language acquisition skills and the WIOA staff administers the TABE to jobseekers interested in WIOA Individualized and Training Services.

- An outline of how the local area will ensure that test administrators are to be trained in accordance with this policy and applicable testing guidelines as set forth by the applicable test publisher.

In accordance with DLLR POLICY ISSUANCE 2016-05, Basic Education Skills and English Language Assessments dated February 26, 2016:

TRAINING FOR ADMINISTERING ASSESSMENTS
DLLR requires all Title I and Title II assessment administrators including Youth Program service providers to be properly trained before administering standardized assessments. Programs must comply with all training requirements established by the test publisher, including education and other minimum requirements.

Certified state assessment trainers will train new staff including Intake/Assessment staff, Instructional Specialist and designated workforce staff who will then deliver administration and interpretation procedures for all approved assessments to local programs. Exception: All BEST Plus training shall be conducted at the state level by certified trainers.

All program staff who administer any CASAS assessment are required to complete the CASAS Initial Implementation Training (IIT) offered online prior to administering any CASAS assessment.

Table 2: Staff Training Schedule

WHO	BY WHOM	WHEN	
		Initial	Update
State Trainers	CASAS, TABE or BEST	Upon hire	Every two
Intake/Assessment	State Trainer & Online IIT	Upon hire	Annually
Instructional Specialists	State Trainer & Online IIT	Upon hire	Annually
ELA Lead Teachers	State Trainer & Online IIT	Upon hire	Annually
Local Program Staff	CASAS Online IIT, Intake/Assessment Specialist, Instructional Specialist and/or ELA	Upon hire	Annually

State and local program staff are responsible for maintaining a record for each assessment/training they conduct. This will include original agendas, sign-in sheets, and evaluations in hard- copy or electronic form. State staff will enter state training data and local program staff will enter local program training data in the staff person's LACES personnel record.

The MOED has scheduled planning meetings with local literacy providers to coordinate on efforts to address the aforementioned strategies. MOED in coordination with Adult Education providers will assist in the development of a mapping tool that identifies the locations/times and types of services available in the community.

(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.

Until the One-Stop operator is selected the MOED will convene regular meetings with the Title II

providers to collaboratively implement the strategic intent of WIOA. Strategic goals : 1) will place special emphasis on the development, implementation and/or expansion of strategies for meeting the needs of local employers, workers and jobs seekers through sector partnerships related to in-demand industry sectors and occupations; and 2) will work with our core partner programs to facilitate the development of career pathways, especially within targeted industry sectors, to help individuals with low skill levels complete the education and training they need to attain industry recognized credentials and to meet the skills requirements of in demand industries or occupations.

The president of the Baltimore City Community College represents Title II on the Workforce Development Board.

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

Baltimore City Community College, a Title II provider, will continue to facilitate GED and pre-GED classes in the AJC's four half-days per week. Through practice testing and GED.com, the instructors will determine the candidate's readiness to matriculate from Pre-GED to GED and readiness for sitting for the GED exam. The Title II providers may refer between programs based on the needs of the jobseekers after assessment and testing.

One-Stop staff will refer to ESL classes as appropriate.

Section 7 – Vocational Rehabilitation Functions

This Section should include --

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

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

- Provide intake, orientation, and assessments for disabled job-seekers;
- Promote employment of persons with disabilities;
- Provide comprehensive assessments and an Individualized Employment Plan;
- Provide guidance and counseling, physical restoration, and training to financially eligible persons with disabilities;

- Provide follow-up services to enhance job retention;
- Provide other services as may be available and appropriate;
- Provide Pre-Employment Transitioning Services for students with disabilities, as defined by WIOA;
- Provide Supported Employment Services for youth and adults with disabilities as defined by WIOA;
- Provide independent living services older blind services to enhance the capacity of persons with disabilities to live unaided in the community;
- Provide performance information as required by WIOA;
- Provide crossing training of Workforce staff on disability related issues;
- Provide technical assistance on disability related issues and on assistive technology;
- Engage employers through the Division's Business Liaisons;
- Work in a collaborative manner to coordinate services among the Workforce Partners for individuals with disabilities.

(B) A description of how individuals with disabilities will be served through the American Job Center system in the Local Area**.**

As with all individuals, whether they have a disability or not, who access the American Job Center, the goal is to have a universal referral form, which will enable individuals to select the services they feel they need. In addition, the goal is to ensure that all information and services provided are accessible, regardless of the individual's disability.

The American Job Centers intends to employ a triage service delivery model. This model ensures that a customer is not forced to follow a prescribed set of processes that may not meet their needs. Rather, a greeter provides the customer with an informal assessment and overview of Career Services and resources then connects the customer to the appropriate service and/or partner.

When a customer enters the American Job Center and self identifies as having a disability – Staff will inquire if the person needs accommodations or assistance to access the AJC. The One-Stop will comply with the A.D.A. by promoting inclusion, choice, and accessibility and ensure that job seekers with disabilities have access to all services. If the customer determines there is no accommodations needed, they will be assisted in accessing the AJC without supports. If the customer determines there are accommodation needs in order to access the AJC, they will be offered supports to include:

Referral to DORS Services if requesting any of the following:

- an accommodation needed to access the AJC, or
- indicates a need for multiple or extensive vocational services, or
- Customer receives SSI or SSDI benefits as a result of a disabling condition (qualifies for Ticket to Work).
- Is interested in specialize vocational rehabilitation services to assist with employment.

The resources offered at the One-Stop will be:

- A Vocational Rehabilitation Specialist/Counselor will be assigned to AJC for direct referral, and technical support for persons with disabilities working with AJC Partners

- Promote blending, leveraging and braiding of resources to benefit job seekers with disabilities.
- Provide information to staff and customers regarding reasonable accommodations at job sites.
- Provide Employers information regarding ADA and reasonable accommodations.
- Employment and skills training workshops and seminars available through the job center
- Increased use of the career resources area.
- Awareness and utilization of the job center's assistive technology
- Information about the array of additional resources outside the job center
- Referrals to appropriate service providers
- Provision of supportive services
- Partners will share employer, job development and job placement databases and openings

Physical Accessibility of Facilities, Programs and Services:
The One-Stop offers physical accessibility to the facility, including:

- Wheelchair accessible ramp
- Extra wide handicap parking space
- Customer accessible bathrooms
- Universal Accessible workstation
- VRI –Virtual Interpreter Interaction

Technology and Materials for Individuals with Disabilities:
The One-Stop offers the following and will continue to improve assistive technology resources:

- Access to Vocational Rehabilitation Specialist/Counselor
- Magnifier, Zoom Text, and Scan and Read Pro
- On-demand Video Relay for Sign language and oral interpreters (VRI system)
- Flatbed scanner (perfection 4490)
- Talking Typing Teacher
- J.A.W.S.
- Lexington Expert Trackball Mouse

DORS will provide partner staff development (Quarterly and on-going) in areas such as:

- Importance of programmatic as well as physical accessibility
- Serving customers with identified disability requiring support services
- Disability etiquette and sensitivity training to Partner/Agency Staff
- Referral to DORS Staff for Rehabilitation Technology Services for assistive technology assessments of for employment using Universal Workstation design and accessibility.
- Technical assistance to all AJC Staff and Partners working with persons with disabilities
- Partner cross training on disability services and programs available to AJC users.

Section 8 – Temporary Assistance for Needy Families Functions

The Baltimore City Department of Social Services (BCDSS) is a local entity of the Maryland Department of Human Resources and is responsible for administration of the federal Temporary Assistance to Needy

Families (TANF) program for Baltimore City. This program is known in Maryland as the Temporary Cash Assistance (TCA) program. BCDSS has a monthly caseload of approximately 9,000 TANF cases. Some TANF recipients are exempt from work requirements, and others are work-eligible. Work-eligible recipients are required to participate in work activities, which can take various forms (participation in job training programs, barrier removal, work experience placements, subsidized and unsubsidized employment, etc.). BCDSS is required to meet established goals pertaining to the work participation rate of TANF recipients in its caseload. Through pay-for-performance contracts as well as a partnership with the Mayor's Office of Employment Development, BCDSS provides workforce development services to TANF recipients.

Through increased collaboration and integration of workforce development services across WIOA Partners, Baltimore City aims to increase participation of TANF recipients in WIOA services.

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

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

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

This Section should include-

(A) A description of the Local Board's implementation timeline and planning activities for TANF. (e.g. strategies for improving customer intake, service coordination, client monitoring and tracking, targeting employment services to low-skill, low-wage workers, etc.)

Implementation of the mandated partnership between the Temporary Assistance for Needy Families program and other WIOA Partners is being phased in over the four year period of Maryland's WIOA Combined Plan. As determined by the Maryland Department of Human Resources through the WIOA/TANF readiness assessment, Baltimore City will be part of the second phase of implementation and therefore will begin implementation in full as of January 2018.

Individuals served by Temporary Assistance for Needy Families called Temporary Cash Assistance in the State of Maryland, are a primary target population for Workforce Innovation and Opportunity Act Title I Adult Programs. This low-income and multi-barrier target population will be an important component of a successful local workforce system making the partnership with Temporary Cash Assistance essential.

As referenced throughout this Plan, the partners including Temporary Cash Assistance have agreed to an integrated common intake that includes initial screening, Maryland Workforce Exchange registration, referral, and basic career services. In addition, Temporary Cash Assistance representatives will participate in coordination meetings monthly to facilitate co-enrollments, career pathway strategies, system orientation, and coordination of exits and supportive services. Temporary Cash Assistance will also participate on the local Integrated Business Service Team that will conduct business development opportunities for job placements.

To plan for this implementation, Baltimore City's WIOA Partners participated in a strategic planning session held in August and December 2016, made available through technical assistance resources provided by the Systems to Family Stability National Policy Academy. This session was led by Dr. Michelle Derr of Mathematica Policy Inc. and focused on innovative practices that increase engagement of TANF recipients and improve utilization of WIOA services. Partners received training to employ a rapid-cycle evaluation model to assess gaps in service for TANF recipients, design small-scale changes that can be readily implemented, collect data on early implementation, evaluate and adjust as needed, and bring promising practices to scale.

(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 (WPR)
- Access to business services and employer initiatives to attract and better serve employers by marketing joint services, minimizing the burden on employers who use the centers, and provide employer-focused services through a single point of entry rather than through all partnering programs
- Contribute and provide baseline outcomes data to the WIOA system through strategies for collecting and reporting varied program reporting requirements

<u>Existing Coordination of Services</u>

Even prior to the enactment of WIOA and implementation of this combined local plan, a history of collaboration has existed between TANF work programs and the broader workforce system in Baltimore City. The following collaborations are currently in place:

a. BCDSS partners with the Mayor's Office of Employment Development's Employment Continuum (MOED-EC) office to provide job training and job placement services to a portion of Baltimore City's TANF recipients.

b. Every customer referred to MOED-EC is registered with the Maryland Workforce Exchange.
c. The Northwest American Job Center provides expungement services for TANF recipients.
d. BCDSS partners with MOED to help provide summer jobs for youth every summer.
e. MOED-EC assists TANF customers with GED and pre-GED programs to help prepare them for the GED test.
f. Data sharing: MOED-EC has access to the Maryland DHR WORKS program database.
g. BCDSS has established partnerships with the Community College of Baltimore County, University of Maryland Medical Center, Johns Hopkins University, Greater Baltimore Urban League and many others to provide specific skills training opportunities for TANF customers.

Through WIOA implementation, Baltimore City plans to continue and expand upon this existing partnership.

Initial Goals for Implementation

Specific goals for the TANF-WIOA partnership will continue to be developed through the remainder of 2016 and 2017 in preparation for January 2018 implementation. Initial goals for the partnership are as follows:

a. Blend BCDSS business partnership program with WIOA business services and AJCs.
    i. Locate 2-3 BCDSS staff at American Job Centers (AJCs) to monitor participation of TANF customers in AJC-facilitated work opportunities and ensure compliance with work participation requirements.
    ii. Ensure access to AJC opportunities for all TANF customers, regardless of service provider.
    iii. Link BCDSS work program vendors to the business services team at MOED.
b. Cross-train staff
    i. Train AJC staff on work participation requirements of TANF customers.
    ii. Train all workforce area partners to enhance awareness of BCDSS programs, eligibility criteria, and available support services.
    iii. Train BCDSS staff and staff of BCDSS work program vendors to ensure full awareness of resources, opportunities, and tools available through AJCs.
        1. For example: training all work program vendors on how to enroll customers in the Maryland Workforce Exchange and how to leverage that tool for customers.
c. Align and share job-readiness assessment tools to create a more seamless intake process and prevent duplication of effort for customers and staff.
d. Blend performance measures across programs to aid in reporting.
e. Leverage opportunities provided by the Maryland State Department of Education Division of Rehabilitation Services (DORS) for TANF customers with disabilities.
f. Work to engage more TANF customers in GED programs, while maintaining the necessary blend of work activities to ensure compliance with work participation requirements.
g. Enroll a portion of TANF youth between the ages of 16-24 in WIOA's out-of-school youth program.

h. Increase utilization of Re-entry Center services for TANF customers who are ex-offenders.

To ensure coordination of services, the MOED and workforce partners developed a matrix that outlined the services provided by each partner for better coordination and mitigate duplication of services. The matrix is being used as a tool to better understand the scope of services available to customers and to enhance providers' ability to refer customers to the appropriate program to meet their employment development needs. A referral form was created to help facilitate the process.

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

The BCDSS Director has been a longstanding member of the Local Board since 2015 and sits to ensure that TANF expectations, roles, and responsibilities are addressed in Baltimore City.

Section 9 – Jobs for Veterans State Grants Functions

This Section should include --

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

In accordance with the Jobs for Veterans Act (P.L. 107-288) (38 USC 4215(a)), the Veterans' Benefits, Health Care, and Technology Act 2006 (P.L. 109-461), and 20 CRF Part 1010, published on December 19, 2008, MOED will ensure that eligible veterans and eligible spouses are identified at the point of entry, are aware of their entitlement of priority of service and are given an opportunity to take full advantage of priority of service and the full array of employment, training and placement services, consistent with requirements outlined in Training and Employment Guidance Letter 10-09 and Veterans' Program Letter 07-09. The initial assessment and registration documents must identify veteran status. Veterans and their eligible spouses advancing to intensive level and training services must document their veteran status by supplying a copy of their DD214 or other veterans' documentation. Priority of service for veterans and their eligible spouses as defined in the public law is as follows:

- Veterans and their eligible spouses must meet the program operator's eligibility requirements before priority is applied.
- Veterans and their eligible spouses will be afforded priority when they meet program eligibility requirements, and when two or more applicants are of equal status, skill or ability.
- First to be served will be public assistance recipients and low-income individuals who are also veterans or their eligible spouses.
- Second to be served will be public assistance recipients and low-income non-veterans or their eligible spouses.
- Among participants who are not public assistance recipients or low-income individuals, veterans and their eligible spouses will receive priority over non-veterans.

Individuals who self-identify as a veteran or eligible spouse to the greeter upon entering the Job Center will be given the Veterans Significant Barriers to Employment questionnaire to identify significant barriers. Those veterans identified as having significant barriers (and determined to need additional assistance) will be directly routed to the Veterans Representative in the center. Those veterans who do not have significant barriers will not be seen by a veteran representative but will receive priority of service for training within the American Job Center.

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

All job orders developed by the Business Services Unit are shared with the Veterans Services LVER who reviews and screens for candidates 24 hours prior to the job order being released to the general population. The LVER attends the monthly Business Services meeting and connects with the business community to create recruitment events and opportunities for veterans to network with employers as well as facilitating job clubs. In addition, they share business contacts to avoid duplication of efforts.

Section 10 – Fiscal, Performance and Other Functions

This Section should include --

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

The Mayor's Office of Employment Development, on behalf of the City of Baltimore, will be responsible for the disbursal of grant funds described in section 107(d)(12)(B)(i)(III).

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

The ongoing BWDB planning process along with consideration of available and adequate resources to support the AJC operations define the number and type of centers required to best serve the workforce development needs of Baltimore City. MOED regularly reviews funding levels quarterly to forecast changes and trends and seeks funding to support the services needed for city residents. MOED uses an integrated approach to service delivery which includes the use of braided funding.

(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;

MOED will use a competitive process based on the principles of competitive procurement outlined in 2CFR 200.318-200.326 of the federal Uniform Administrative Requirements for Grants provisions. In addition, MOED will review the risks associated with a potential sub-grantee prior to making an award. Risk analysis tools shall include a relevant combination of: available audit information; requiring disclosures of conflict of interest and relevant criminal violations; prohibiting profit, if

applicable; requiring certifications of senior entity officials; etc. Our award agreements will provide MOED with remedies to address non-compliance, combined with flexibility to adjust its oversight framework based on risk considerations and assessments.

A subcommittee of the Youth Committee, the Systems Building Committee, identified the criteria to be used in selecting eligible youth service providers several years ago. Committee members used information from the National Youth Employment Coalition as well as documents from the America Youth Policy Forum and the Sar Levitan Youth Policy Network. Periodically, the process is reviewed and updated. The Department of Labor, Licensing and Regulation, Division of Workforce Development and Adult Learning coordinate statewide meetings that allow practitioners to meet and discuss strategies for selecting effective criteria to designate youth service providers.

The Youth Committee disseminates a Request for Proposal (RFP) to identify community based organizations and agencies to provide services to in-school and out-of school youth every other year. The RFP is advertised in the local newspaper and on websites (BWDB & MOED). An informational Bidder's Conference is scheduled and parties who plan to submit a proposal are strongly encouraged to attend and/or be represented by an individual authorized to act on the bidder's behalf. All inquiries related to the RFP are to be submitted electronically. A compilation of responses from the Bidders Conference are posted in the "Questions and Answers" section of MOED's website. After the RFP's are submitted, Youth Committee members are asked to volunteer to review the RFP's. The volunteers are placed in teams to review, rate and rank the RFP's. Volunteers are asked to disclose any conflicts of interest prior to reading the assigned RFP's. Review teams have an opportunity to discuss the RFPS and submit recommendations to the BWDB for approval.

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

The local board has negotiated with the State Department of Labor, Licensing and Regulation for agreed upon DOL common measures for WIOA performance. Performance data is provided by DLLR on a monthly basis, analyzed by MOED's Performance, Evaluation and Data Support and distributed to program operators with recommendations for improvement when needed.

The WIOA negotiated levels for the state core indicators between MOED and DLLR include:

WIOA Performance Metrics	Agreed Upon Goals for PY2016 and PY2017
Adult Measures	
Employment Rate 2nd Quarter after exit	72%
Employment Rate 4th Quarter after exit	70%
Median Earnings 2nd Quarter after exit	$5,000
Credential Attainment within 4 Quarters after exit	55%
Dislocated Worker Measures	
Employment Rate 2nd Quarter after exit	68%
Employment Rate 4th Quarter after exit	68%
Median Earnings 2nd Quarter after exit	$6,500
Credential Attainment within 4 Quarters after exit	55%
Youth Measures	
Employment or Placement Rate 2nd Quarter after exit	65%
Employment or Placement Rate 4th Quarter after exit	60%
Credential Attainment within 4 Quarters after exit	67%
Wagner-Peyser Measures	
Employment Rate 2nd Quarter after exit	55%
Employment Rate 4th Quarter after exit	55%
Median Earnings 2nd Quarter after exit	$4,000

Negotiated levels for Measurable Skills Gains and Indicators of Effectiveness in Serving Employers are forthcoming. The measures for employers will be Employer Penetration Rate, Repeat Business Customers, and/ or Jobseekers Retained with Same Employer in the 2nd and 4th Quarters After Exit. (reference TEGL 10-16: Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III, and Title IV Core Programs)

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

The BWDB's Workforce Effectiveness Committee and MOED will work closely with the state to develop a series of reports and dashboards for the system which will include performance indicators for Baltimore's workforce system.

Evaluation has always been, and will continue to be an integral part of the local board and MOED. As a forerunner in the field of workforce development evaluation, MOED has a Program Evaluation department that is responsible for establishing goals and monitoring performance. Each program's goals are designed to assist in the achievement of overarching agency goals. Program performance information is reviewed monthly at management team meetings, biweekly by one-stop centers, and quarterly by the standing youth committee and local board.

Performance data helps to inform the board's strategic planning and is used by MOED as a mechanism for identifying course corrections in process, protocols and procedures.

Performance information plays a significant role during the procurement process which selects service providers as well as during the formation of each provider's performance contract. Throughout the contract period, performance is reviewed monthly and quarterly and establishes a performance feedback loop and management tool which is used by MOED staff and providers to identify areas of underperformance and to implement corrective action plans.

(F) 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.

MOED's individual training account policy has a cap of $3000 person with exceptions approved by the executive staff and each ITA shall not exceed fifty-two weeks in length. See Attachment 1 for MOED's ITA process and procedures.

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

The Individual Training Account (ITA) initiative empowers customers through a comprehensive assessment and evaluation of their skills, aptitudes, abilities, and values. The ITA initiative is paramount to the customer's long term success and career planning process by helping them acquire marketable skills in a high growth, high demand industry to successfully enter or re-enter the workforce at sustainable wages. Accordingly, all customers who are in need of training begin the process with an interest and aptitude assessment, and participation in a Training Strategies Workshop.

The one on one sessions or workshops provide customers with an in-depth orientation to the ITA process, policies and application requirements. The curriculum also introduces the resources available to them to facilitate their decision making process. As part of the workshop, information is provided regarding the Pell Grant process as well as other resources for financial aid by a partner representative stationed at the American Job Center (One-Stop Center) from The Maryland Educational Opportunity Commission (MEOC). The MEOC staff also provides individualized assistance to customers in the completion and submission of the Pell Grant application.

To reinforce the information provided in the sessions, an ITA application packet is provided to each customer. The application process requires customers to justify that their career choice is in one of the eight targeted high-growth, high demand industries for workforce development designated by the Baltimore Workforce Development Board. Pertinent labor market information collected through the auspices of the Baltimore Workforce Development Board will be available to the customer to assist with their decision making. The ITA packet is under revision to include WIOA changes and will be available in the new format by July 1, 2017.

Completed applications are reviewed with the customer by center staff to ensure completeness and accuracy. The center supervisor also reviews the completed application packet and provides sign-off approval prior to submission to the MOED Contracting and Compliance Unit. Once the funding is approved, a "Welcome to ITA" packet is issued to the customer emphasizing their responsibilities and

providing the start date and estimated end date of training. Extensive follow-up is conducted while the customer is in training to ensure that they are progressing and to offer assistance and guidance. Customers are required to submit attendance and grades and to work with staff to develop and participate in a job search plan commencing 30-60 days prior to their estimated training completion date. The BWDB set the current cap for ITA vouchers at $3,000, allowing for the consideration of exceptions based on an individual's documented need. Exceptions may be granted by an executive staff.

Customized Training is an alternative strategy also used by MOED which assists businesses in hiring skilled workers for hard-to-fill or newly created positions. Businesses interested in customized training work directly with MOED's Business Services staff to create a proposal which is forwarded to the Contracting and Compliance Unit to be finalized and a contract created.

Businesses engaged in customized training are responsible for a 50% match for each dollar MOED invests in skills training for the customer. The match can be made monetarily or with in-kind contributions. The advantage to the customer is that businesses agree to hire the customer if the individual successfully completes the skills training. MOED staff will assist customers in determining which training program best fits their particular needs and skills set.

The local board may also select a training service program of demonstrated effectiveness offered in the local area by a community-based organization or another private organization to serve individuals with barriers to employment through a competitive process and may be a pay-for-performance agreement.

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

Availability of the Baltimore City Workforce Innovation Opportunity Act Plan was published in two local newspapers during the weekend of August 5, 2016. A formal session to present the plan was held at the Eastside Career Center on August 11, 2016. The plan was made available to the public though MOED's website or a direct request by phone or email. This publication was followed by a thirty (30) day comment period beginning August 1, 2016 and ending August 30, 2016. As comments are received, the plan will be amended. The entire plan is posted on the MOED website: **www.oedworks.com and www.baltoworkforce.com** .

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

The MOED and its core partners leverage the MWE website to ensure that job seekers have twenty-four hour access to assessments, labor market information, resume development and job matching. New this year is the MWE Jobs Mobile App which is available both on Apple iTunes and in the Google play sites for mobile phones or tablets. This app allows jobseekers to search for available job openings and easily map jobs near their current location.

The MWE and the MWE app allow customers to access services from home or other preferred locations without having to access the AJC.

(J) A description of the Local Board's procedures for conducting oversight and monitoring of its WIOA activities and those of its subgrantee and contractors. The monitoring plan shall address the monitoring scope and frequency and shall include the following:

- The roles and responsibility of staff in facilitating this procedure;
  MOED staff (both program and fiscal staff) are responsible for these processes;

- A requirement that all subgrantee agreements and contracts be monitored at least annually; Subgrantees will be monitored (includes programmatic and fiscal elements) at least once during the agreement if less than twelve months or each full twelve month period of the underlying agreement. These processes do not apply to vendor relationships;

- Procedures for determining that expenditures have been made against the cost categories and within the cost limitations specified in the Act and WIOA regulations;
  Refer to Sections T-Z of our Plan;

- 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;
  MOED has a written subgrantee monitoring plan which outlines compliance monitoring processes and procedures. A copy was filed with DLLR in April 2014. (Attachment 2)

- 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;

  MOED has a written subgrantee monitoring plan which addresses corrective action processes related to findings and/or concerns resulting from monitoring activities. A copy was filed with DLLR in April 2014;

- Provisions of technical assistance as necessary and appropriate;
  MOED continually commits to providing technical assistance to subgrantees when necessary and appropriate.

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

The MOED makes every effort to protect personally identifiable information which includes name, address, social security number, and other related data elements that indirectly lead to identification. Physical files are kept securely locked and safeguarded. Yearly, MOED staff who have a "need to know" in their official capacity and have access to such systems of records will sign a confidentiality agreement.

The MOED will consult with attorneys from the Baltimore City Solicitor's Office to ensure that evolving issues related to the protection, maintenance and use of personal information is in keeping with accepted industry standards and relevant state and federal laws.

(L) A description of the Local Board's procedures for handling grievances and complaints from participants and other interested parties affected by the local American Job Center system, including partners and service providers. Provide a separate description for the:

- Complaints alleging discrimination on the ground of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries only, citizenship or participation in any WIOA Title I – financially assisted program or activity;

  Complaints alleging discrimination on the basis of race, sex, religion, color, national origin, age, political affiliation or belief, and for beneficiaries only, citizenship or participation in any program funded under the WIOA or in the process of admission or access to, opportunity or treatment in, or employment in the administration of or in conjunction with, any WIOA funded program or activity, may file a complaint, either by him/herself or through a representative, within one hundred eighty (180) days from the date of the alleged violation with the MOED's equal opportunity officer. If such a complaint is received, MOED will immediately notify DLLR and the directorate of Civil Rights, Washington, D.C. of the existence of the complaint. A complaint may be filed directly with the Directorate of Civil Rights (DCR), U.S. Department of Labor, 200 Constitution Avenue, N.W., Room N-4123, Washington, DC 20210. If the complainant elects to file his/her complaint with MOED, the complainant must wait until the MOED issues a decision or until ninety (90) days have passed, whichever is sooner, before filing with DCR. If MOED has not provided the complainant with a written decision within ninety (90) days of the filing of the complaint, the complainant need not wait for a decision to be issued, but may file a complaint with DCR within thirty (30) days of the expiration of the ninety (90) day period. If the complainant is dissatisfied with MOED's resolution of the complaint, the complainant may file a complaint with DCR. Such complaint must be filed within thirty (30) days of the date the complainant received notice of the MOED's proposed resolution.

  Complainants alleging a discrimination complaint must first utilize or exhaust the grievance procedure of MOED before a complaint may be filed with the Directorate of Civil Rights, Washington, D.C. If such a complaint is received, MOED will immediately notify DLLR of the existence and nature of the complaint using the Notification of Receipt of WIOA Complaint Alleging Discrimination form. Complaints must be filed within one hundred eighty (180) days from the date of the alleged discrimination. Filing with the Directorate of Civil Rights must occur in writing within thirty (30) days of the MOED decision or ninety (90) days from the date of the original filing, whichever is earlier.

  Complaints and Grievances not alleging illegal discrimination will have resolution attempted by exhausting this grievance procedure. If resolution is not achieved, complainants may request a DLLR review of findings by filing a request with DLLR after receiving MOED's decision that resulted from the hearing of the complaint. Complaints must be filed within one (1) year of the event(s) on which the complaint is based except in the case of complaints alleging fraud or criminal activity. DLLR will render a decision on the grantee's written decision within ninety (90) days of the original complaint date.

- Complaints and grievances not alleging illegal forms of discrimination. This includes grievances from individuals alleging labor standards violations.

  Complaints by regular employees or their representatives that allege any labor standards violations have the opportunity for an informal resolution of the complaint. If not resolved informally, a hearing will be held in accordance with this grievance procedure. The procedure must take no longer than sixty (60) days from the date of filing to be exhausted which includes time spent informally attempting to resolve the complaint. The complainant has the right to have the decision reviewed by DLLR. The complaint must be filed within one (1) year of the alleged occurrence.

- Remedies that may be imposed for a violation of any requirement under WIOA Title I, limited to, suspension or termination of payments under the title; prohibition of placement of a participant with an employer that has violated any requirement under WIOA Title I; reinstatement of an employee, payment of lost wages and benefits, and reestablishment of other relevant terms, conditions, and privileges of employment (where applicable); and other equitable relief as appropriate.

Remedies shall be tailored to the specific circumstances and violations and may include, but not limited to:

- provision of service, benefit or employment opportunity denied,
- monetary payment for loss of employment opportunity or benefit,
- disciplinary action(s) against the individual(s) found to have discriminated,
- training for individual(s) found to have discriminated and for other appropriate individuals,
- nullification of an adverse action,
- removal of adverse records or documents from client/personnel files, and
- preparation of statement of no retaliation.

Should the proposed remedies be acceptable to all parties, if appropriate, the EO Officer shall prepare a written Settlement Agreement which contains the specified remedies and which the complainant and respondent will sign.

The Agreement shall include a stated time frame for implementation of the remedies. Should the complainant or respondent be dissatisfied with the recommended remedies and no solution appears probable, the Equal Opportunity Officer shall inform the complainant of additional filing rights and time frames for filing as appropriate.

Where the Equal Opportunity Officer makes a decision that there is no probable cause to believe that an act of illegal discrimination has occurred, the complainant shall be so notified.

Where the complainant does not accept the decision, the Equal Opportunity Officer shall inform the complainant of additional filing rights and time frames, as appropriate.

The current Grievance Procedures/ Complaint Process Procedures are attached.
(See attachment 3).

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

In serving persons with disabilities, MOED will make every effort to provide reasonable accommodations to allow for full program participation including, but not limited to, providing auxiliary aids and services and ensuring effective communications through alternative formats. Each program or activity, when viewed in its entirety, will be accessible to qualified individuals with disabilities in accordance with the Americans with Disabilities Act. (ADA).

The existing guidance will be reviewed and policy created keeping in line with the Baltimore City Administrative Manual by June 30, 2017.

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

MOED will take reasonable steps to provide auxiliary aids and materials to ensure that communications with individuals with disabilities, including individuals with visual or hearing impairments are assisted. Examples include but are not limited to: large print, Braille, interpreting services, allowing people with visual or learning disabilities or who have limited use of their hands access to tape recorders or a computer.

All MOED facilities go through an annual assessment to verify that they are ADA accessible.

MOED will coordinate training with DORS to provide quarterly WIOA staff training on awareness, interpretation, available tools, the use of tools and connecting individuals to resources.

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

MOED works with sign language translators and relay services to ensure we are relaying the same messages to all customers and the message is understood. Assistive technology at the Career Centers labs includes zoom technology for the visually impaired.

(P) A description of the steps the Local Board will take to meet the language needs of limited English speaking individuals who seek services or information. The description should include how the Local Board proposes that information will be disseminated to limited-English speaking individuals.

For individuals who speak limited English, MOED will provide written materials in Spanish and other languages as required and utilize interpreting services offered by MOED staff and partnering agencies. The AJC uses the "Language Line" for telephone interpretation. Signage is prominently displayed in the AJC reception/ waiting area indicating the availability of a "point to your language" interpretation service.

Referrals are also made to ESL classes at Baltimore City Community College.

(Q) A description of the Local Board's procurement system, including a statement of assurance that the procedures conform to the standards in DOL regulations set forth in 29 CFR Part 95, Part 97 and 2 CFR 200.

MOED follows the procurement policies and procedures outlined by the City of Baltimore which are at least equally as stringent as those outlined in DOL regulations set forth in 29 CFR Part 95, Part 97 and 2 CFR 200. The actual procurement of most goods and non-professional services are initiated by MOED but the actual awards and placement of orders is handled by the Baltimore City Bureau of Purchases. Baltimore City's procurement policies and procedures, particularly as they relate to MOED, conform to the standards in applicable US DOL regulations set forth in 29 CFR Part 95, Part 97 and CFR 200 .

The city's procurement policies do allow for MOED to procure goods and services which are valued at less than $5,000 after securing at least three (3) competitive quotes and making a sound price and quality comparison. There are few exceptions permitted to the process.

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

The MOED shall adhere to the acquisition, management and disposition of property as prescribed in the United States Department of Labor Regulations 29 CFR Part 97 and/or 29 CFR Part 95. Evidence of adherence to those regulations can be found in applicable Baltimore City policies & procedures, written supporting documents related to actual and relevant activities, including but not limited to: solicitations for proposals, pricing and value reviews, monitoring and evaluation reports, inventory logs, etc.

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

The BWDB has prepared and implemented its **Conflict of Interest policy** (Attachment 4) signed by each BWDB member. This policy addresses conflicts of interest including matters related to the awarding of contracts.

(T) A description of the Local Board or fiscal agent's accounting procedures, including the procedures used in preparing reports to the State. In addition to the requirement that all financial transactions be conducted in compliance with Generally Accepted Accounting Principles (GAAP), the fiscal management system must include the following in the accounting procedures. This description must address how the fiscal system:

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

Baltimore's City Dynamics system and the MOED's FundWare system are both designed to track and report actual costs against established cost categories (eg. administration, training, etc.) and natural account codes. Each funded activity requires a detailed budget and alignment with appropriate cost categories and natural account codes. The pre-approval of expenditures and effective monitoring of financial transactions, supporting documents and records all aid in ensuring timely and accurate accounting and reporting.

a. Fiscal Reporting System

The monthly receipts and expenditures reports are generated by the Baltimore City Accounting Operations Division. Interfacing these reports with MOED's internal financial management information system, Fundware, forms the basis for accruals that are recorded and reported to DLLR and others.

b. Obligation Control System

The MOED initiates a planning cycle prior to the beginning of each program/fiscal year to plan for anticipated funding and the associated delivery of associated services and infrastructure support. This planning process allows for control of the total obligation level of each funding source. After planning targets are identified and subsequent programs are put in place, MOED staff monitors the obligation and anticipated expenditure levels of each of its programs and grants to ensure that costs are in-line with available funding. A variety of review processes are put in place to monitor and control the level of obligations and subsequent expenditures.

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

MOED's Fiscal Administration and Contracting Units are the primary units responsible for financial recording and reporting. Key staff positions from these units include, but are not limited to: Assistant Director/Comptroller; Director of Fiscal Operations; and, Manager of Contracting & Compliance.

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

A description of our related processes and controls is provided throughout our responses to individual questions posed in Section 10 of this plan. Collectively, our responses describe how our financial system will permit tracing of funds to a level adequate to establish that funds have not been used in violation of applicable WIOA standards or applicable DOL regulations. More specifically, access to procurement and financial systems is restricted to specific positions/individuals; generally there are least two (2) levels of supervisory oversight of procurement and financial transactions; and, there is an Executive level review and approval process in place for external financial reports (eg. Quarterly Reports and Closeout Reports to DLLR). Our systems provide easy tracing of transactions from original source documents to related fund accounting reports via unique fund (general ledger) accounting numbers and staff identification codes.

(W). Provide a brief description of the following:

a. Fiscal reporting system
b. Obligation control system
c. ITA payment system
d. Chart of account system
e. Accounts payable system
f. Staff payroll system
g. Participant payroll system
h. Participant stipend payment system

Baltimore's City Dynamics system and the MOED's FundWare system are both designed to track and report actual costs against established cost categories (eg. administration, training, etc.) and natural account codes. Each funded activity requires a detailed budget and alignment with appropriate cost categories and natural account codes. The pre-approval of expenditures and effective monitoring of financial transactions, supporting documents and records all aid in ensuring timely and accurate accounting and reporting.

a. Fiscal Reporting System

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Under the ITA payment system contracted training providers submit an invoice for payment of each pre-authorized ITA event. Invoices are accompanied by required back-up documentation that is reviewed and validated by MOED staff. Once approved by MOED staff the invoice is submitted to the city's accounting operations department for payment. Approved ITAs are tracked, and financially accounted for, by MOED staff from the time an authorization commitment is made to the training provider until actual payment is made to the provider.

MOED's chart of accounts, as well as Baltimore City's sister chart of accounts, allows MOED to capture, segregate, track and reports revenue and expenses by various and multiple categories, including but not limited to: funding stream, vendor, program title, operating period and/or fiscal period, operating department, natural account number, etc.

Within the MOED's infrastructure, a series of checks and balances are used to insure the accuracy and timeliness of accounts payable processing. When an invoice is received for payment it, along with relevant supporting documentation, is reviewed for accuracy, legitimacy, etc. by at least two separate and distinct staff review levels before being approved and submitted to the City's Department of Finance for actual payment processing.

The staff payroll processing is a part of the overall Baltimore City Payroll System and requires individual time and attendance reports to be submitted for each payroll period. Time and attendance reports must be approved by both the staff person and his/her supervisor. The Baltimore City Payroll Department processes all payrolls and manages the Payroll System. Back up payroll documents are maintained by MOED. MOED's Human Resources Department manages the underlying wage and salary records for MOED staff which cover such events as: on-boarding of new employees, staff transfers, terminations, wage and salary adjustments, etc.

The participant payroll and the participant stipend systems have similar processing and control features to those of the staff payroll system. However, management and control of MOED individual participant records rests with a unique program operating departments of MOED versus MOED's Human Resources Department.

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

Grant funds are drawn-down through DLLR quarterly and typically on a cost reimbursement basis.

(Y) 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.
- Description of cost allocation plans for American Job Centers.

Cost Allocation Plan

During both the budgeting (eg. detailed budgets are required by DLLR) and quarterly reporting (of actual expenses) processes, the MOED assigns administrative and program costs to the

benefiting programs/funding sources. Expenses benefiting a single program/funding source are directly charged to that source while those benefiting multiple programs/funding sources (indirect costs) are "pooled" (MOED maintains an Administrative Cost Pool [ACP] and a Program Cost Pool [PCP]) for later pro rata allocation between the multiple programs/funding sources based on logical criterion. Effective July 1, 2016 indirect costs (ACP & PCP), including salary and fringe benefits costs, will be allocated using a Direct Cost Allocation Method with Modified Total Direct Costs used as the basis for allocation. This methodology follows guideline published by the US Dept. of Labor's Division of Cost Determination.

If warranted, additional cost pool classifications may be developed in the future. Costs that are directly charged are also categorized as Administrative or Program based on guidelines established by each funding source. The Cost Allocation Plan and its related distribution methodology will be applied consistently throughout the fiscal year.

MOED intends to share applicable One-Stop Career Center costs with required partner agencies via negotiated and equitable resource sharing (cost sharing) agreements with each. Each partner will be assessed a fair share of the commonly-shared operating costs of the One-Stop system.

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

The BWDB/Fiscal Agent will have the lead responsibility for resolution of any and all debts pertaining to WIOA funds awarded to sub-grantees and others. Usually a potential debt is identified at the point where an audit of the program has identified questioned or disallowed costs and generally labels the situations as findings. Steps for resolution of finding(s) include, but are not limited to:

a. The potential debtor is given no more than thirty (30) days to either accept the finding(s) and acknowledge the debt or provide additional documentation not reviewed during the audit which documents the allow ability of the costs questioned. NOTE: disallowed costs are automatic debt payments due to the Baltimore City.

b. If documentation is received, the BWDB/Fiscal Agent and the auditors will review and either accept or reject the documentation. This review shall conclude not more than thirty (30) days upon receipt of the documentation.

c. Should the original finding(s) stand, the BWDB/Fiscal Agent will notify the sub-grantee (or other relevant party) in writing of its findings and prepare a repayment schedule to recover all funds due. The repayment of funds shall not exceed six (6) months from the date of notification by the BWDB/Fiscal Agent.

2016-2020 Local Plan Assurances

Check the following boxes to accept the assurances listed below.

		Assurance	References
✓	1.	The Local Board has processes and timelines, consistent with WIOA Section 108(d), to obtain input into the development of the local plan and provide the opportunity for comment by representatives of business, labor organizations, education, other key stakeholders, and the general public for a period that is no less than 30 days.	WIOA Sections 108(d); proposed 20 CFR 679.550(b)
✓	2.	The final Local Plan is available and accessible to the general public.	Proposed 20 CFR 679.550(b)(5)
✓	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.	WIOA Section 107(e); proposed 20 CFR 679.390 and 679.550
✓	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.	Proposed 20 CFR 679.390
✓	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.	WIOA Section 107(h); proposed 20 CFR 679.410(a)-(c)
✓	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.	WIOA Section 121(c); proposed 20 CFR 678.500-510

✓	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.	WIOA Section 121(c)(v)
✓	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.	WIOA Sections 121(d) and 123; proposed 20 CFR 678.600-615 and 681.400
✓	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	WIOA Sections 107(d)(10), 122(b)(3), and 123; Proposed 20 CFR 679.370(l)-(m) and 680.410-430
✓	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.	WIOA Section 181(c); proposed 20 CFR 683.600
✓	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.	WIOA Section 121(e)(2)(A); proposed 20 CFR 678.305;
✓	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.	WIOA Section 188; 29 CFR parts 37.7-37.9; 20 CFR 652.8(j)
✓	13.	The Local Board ensures that outreach is provided to populations and sub-populations who can benefit from American Job Center services.	WIOA Section 188; 29 CFR 37.42
✓	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.	WIOA Section 188; 29 CFR 37.42

✓	15.	The Local Board complies with the nondiscrimination provisions of Section 188, and assures that Methods of Administration were developed and implemented.	WIOA Section 188; 29 CFR 37.54(a)(1)
✓	16.	The Local Board collects and maintains data necessary to show compliance with nondiscrimination provisions of Section 188 of WIOA.	WIOA Section 185; 29 CFR 37.37
✓	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	CFR Part 230 Appendix B; 48 CFR 31.205-22; RCW 42.52.180; TEGL 2-12; 29 CFR Part 93.100
✓	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 MSFWs that are demand-driven and consistent with ESD's mission.	WIOA Section 167
✓	19.	The Local Board follows confidentiality requirements for wage and education records as required by the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended, WIOA, and applicable Departmental regulations.	WIOA Sections 116(i)(3) and 185(a)(4); 20 USC 1232g; proposed 20 CFR 677.175 and 20 CFR part 603
✓	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.	WIOA Section 108(b)(16); proposed 20 CFR 679.560(a)(15); WIOA Title I Policy 5601; WIOA Section 134(c)(3)(G); proposed 20 CFR 680.300-310
✓	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.	WIOA Section 108(b)(15), WIOA Title I Policy 5230; WIOA Title I Policy 5250

✓	22.	The Local Board ensures compliance with the uniform administrative requirements under WIOA through annual, on- site monitoring of each local sub-recipient.	WIOA Section 184(a)(3); proposed 20 CFR 683.200, 683.300, and 683.400-410
✓	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.	WIOA Section 184(c); 20 CFR Part 652; proposed 20 CFR 683.410(a), 683.420(a), 683.750
✓	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.	WIOA Section 184(a)(2)(A); proposed 20 CFR 683.200 and 683.220; OMB Uniform Administrative Guidance; Generally Accepted Accounting Procedures (GAAP)
✓	25.	The Local Board will not use funds received under WIOA to assist, promote, or deter union organizing.	WIOA Section 181(b)(7); proposed 20 CFR 680.850
✓	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.	Proposed 20 CFR Part 680 Subparts A and B; proposed 20 CFR Part 681 Subpart A
✓	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.	WIOA Section 134(c)(3)(G); Proposed 20 CFR 680.300-320
✓	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	WIOA Sections 129(c)(2)(G) and 134(d)(2); proposed 20 CFR 680.900-970; proposed 20 CFR 681.570

✓	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.	Jobs for Veterans Act; Veterans' Benefits, Health Care, and Information Technology Act; 20 CFR 1010; TEGL 10-09; Veterans Program Letter 07-09
✓	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 Baltimore City 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)[7] — Date: 9/22/2016

Local Workforce Development Board Chair — Date: 09/22/2016

Local Workforce Development Director — Date: 9/22/2014

[7] Additional signature lines should be added to accommodate Local Areas that require more than one local chief elected official signature.

Baltimore City
List of Attachments

1. Individual Training Account Procedures
2. Sub-Grantee Monitoring Plan
3. Grievance/ Complaint Procedures
4. Conflict of Interest form
5. Comments Received as a Result of Public Comment Period

WIOA

Individual

Training

Accounts

Procedures Manual

Mayor's Office of Employment Development
Revised: May 18, 2016
The policies outlined in this version supersede all previous versions of ITA procedures

The regulations for the Workforce Innovation Opportunity Act require that occupational training be provided through Individual Training Accounts (ITA's) allowing for customer choice. Training funded with WIOA dollars can only be provided by those organizations that are approved as qualified and appear on Maryland Higher Education Commission's (MHEC) eligible training provider list found on the web: https://www.mhec.state.md.us/Career/WIOA/searchfor.asp

Funding for Individual Training Accounts is capped at $3000 or any amount over $3000 not to exceed $4500 may be approval by the MOED Assistant Director for Adult Services and may be used to provide training to WIOA Adults, Dislocated Workers, and other special populations funded by WIOA or other funding sources. All training must be completed within 52 weeks unless authorized by the MOED Assistant Director for Adult Services.

Customers will only be approved for the actual cost of the training requested. If a customer has been enrolled in any MOED funded training program during the past three (3) years, they will not be eligible for any further training. Exceptions may be entertained using the criteria outlined below in the Policies section, #6.

Current labor market information is a key factor in the ITA process, and training can only be provided in occupations that are in demand in the Baltimore metropolitan area, and in the eight (8) industrial areas defined by the Baltimore Workforce Development Board. Currently, the eight (8) industries include: Health Care/Social Assistance; Bioscience; Business Services; Computer, Information Technology; Hospitality and Tourism; Construction; Port and Port-Related Service, and Sustainable Energy and Environmentally-driven Services. For more information, visit http://www.baltoworkforce.com/targind.htm on the web.

MOED Policies Pertaining to Individual Training Accounts

1. Customers approved for training are expected to begin classes on the assigned training start date. Exceptions include death in the immediate family, illness or other medical reason precluding start, or when the school cancels the class, the class is full, or the school postpones the class start date. Documentation for the postponement must be provided before a new start date will be assigned. The vendor will be required to submit in writing why the customer was not able to start and provide a new start date. If the customer does not begin on the approved start date, all dollars will be de-obligated. With supportive documentation from the vendor, the CDF (Career Development Facilitator) must change and initial the new start and end dates on the *Customer Application Summary and Checklist*. Operational Policy 2016-1 – ITA Change in Enrollment Date

2. Customers who are referred to an ITA must have attended and completed a training orientation. Additionally, customers referred to a WIOA funded ITA must have an assessment and a documented justification for training. This is mandatory for all Centers in accordance with WIOA regulations. Operational Policy 2015-1 – Individual Employment Plans for Adults – Justification for Training.

3. Vendor invoices must be submitted within thirty (30) days of the customer's actual start date. (Policy Directive #12 – revised 1/26/2010)

   a. If an invoice is 30 days past due, an out of compliance letter will be sent by the Contract Specialist.

   b. A final past out of compliance letter will be sent by the Contract Specialist when an invoice is 60 days past due. The letter will advise the vendor that the invoice must be received within 10 days.

4. The ITA Application is limited to courses leading to an industry recognized credential. Prerequisite courses and pre-training costs are the responsibility of the customer but may be authorized by the MOED Assistant Director for Adult Services. The completion of all courses and certification must be obtainable within 52 weeks unless authorized by the MOED Assistant Director for Adult Services, and increase the customer's ability to obtain a job that leads to self-sufficiency.

5. All training is restricted to customers who can verify residency in Baltimore City. Additionally, customers must have a family income verifiable to be within the 100% Lower Living Income Standard, customers who are eligible for WIOA dislocated worker services, or customers who are eligible for approved training programs under special grant funding (e.g. Rapid Response, TRA, Veterans Employment Program). All eligible funding sources must be recorded on the *ITA Customer Application Summary and Checklist* form.

6. If a customer has been enrolled in an MOED funded training program during the past three (3) years, no further ITA training will be provided. Exceptions may be made for laid off workers who have received previous training through MOED, and who are unable to gain employment in the same occupational area. Valid justification for requesting training must be completed by the Career Development Facilitator (CDF) and attached to the application. Final approval lies within the Workforce Operations Management team.

Functions at the One Stop Career Center

General Eligibility

In accordance with MOED's priority of service policy (Operational Policy 2015-5), priority will be given to veterans and other individuals with low-income or other barriers to employment.

To be considered for a WIOA Adult funded ITA, customers must:

- be determined eligible for WIOA services
- be at least 18 years of age
- be a resident of Baltimore City
- have a family income at or below the 100% Lower Living Standard
- customers referred to a WIOA funded ITA must have an assessment and a documented justification for training.

To be considered for a WIOA Dislocated Worker funded ITA, customers must:

- be determined eligible for WIOA services
- be at least 18 years of age
- be a resident of Baltimore City
- customers referred to a WIOA funded ITA must have an assessment and a documented justification for training.

To be considered for a TAA/TRA funded ITA, customers must:

- be at least 18 years of age
- be a resident of Baltimore City
- be receiving UI benefits
- be displaced by foreign trade

To be considered for an ITA through special grant funding, customers must:

- be at least 18 years of age
- meet the eligible requirements of the grant funding

Customers will have eligibility determination completed for all possible funding. The eligible funding titles of the customer will be recorded on the *ITA Customer Application Summary and Checklist*.

The justification for training must be documented on the customer's service plan (IEP) and kept in the customer's case record.

NOTE: Customers who are currently employed in a declining industry will not be offered training in the same industry.

Assessment is conducted using the Test for Adult Basic Education (TABE) and other available assessment tools based on customer needs, interests, and goals. Industry or trainer entrance requirements may dictate which assessment tools are used. When customers are interested and deemed appropriate for enrollment in training, they will be required to attend a training orientation conducted by the One Stop Career Centers. The curriculum is designed to orient customers to all training including the ITA process.

Customers who are interested in distance learning classes (on line classes) should take an on-line self-assessment to ascertain their ability to be successful in a distance learning environment. There are several free assessments available on the internet, including:
Dr. Robert Kizlik's *Distance Education Aptitude and Readiness Scale (DEARS)*
http://www.adprima.com/dears.htm;
Just How Ready are you for Distance Learning by Thomson & Peterson
http://www.petersons.com/distancelearning/code/articles/distancelearnquiz3.asp;
The Distance Learning Self-Assessment Test from Palloff and Pratt, 1999 used by several colleges including the Connecticut Distance Learning Consortium, Florida Distance Learning Consortium, and approved by the Maryland Institute for Workforce Excellence
http://www.theworkforceinstitute.org/courses/online.cfm); and
The Washington State Board for Community and Technical Courses *Is Online Learning for Me*? questionnaire: http://waol.org/prospective_students/isonline4me_n.asp

ITA Orientation subjects include:

- Customer responsibilities.
- One Stop Career Development Facilitator (CDF) responsibilities.
- Amount and limitations of the voucher (expenditure of WIOA, Governor's Discretionary and Rapid Response dollars and associated caps).
- Steps to be followed to obtain an ITA.
- Responsibilities of the training vendor.
- Information on obtaining financial aid. Determination as to whether the customer is eligible for a State Department of Education Pell Grant or other forms of assistance. Other forms of assistance must be determined prior to using WIOA funds for training.
- If the ITA training costs exceed the funding cap, documentation must be provided by the customer demonstrating how the additional costs will be paid.
- Distribution and review of the ITA Application Packet (Attachment 1).

Maryland Training Provider List

Detailed procedures are outlined in DLLR Policy Issuance 2015-6
Interim Policy on Maryland's Eligible Training Provider List/ July 22, 2015

Currently eligible and potential training providers can be identified in three ways.

1. The school or organization is already on the approved Maryland Higher Education Commission Eligible Training Provider list.
2. The training provider solicits information from MOED regarding being placed on the list. Some vendors may already have their designation determined, but need pre-awards survey and Memorandum of Understanding (MOU) to obtain referrals from MOED.
3. The customer identifies a training provider who is not on the approved list.

If the training provider (vendor) solicits information from MOED or a customer identifies a provider to be placed on the Eligible Training Provider list (ETPL) and MHEC has not determined the status of the vendor, the following process must take place before customers are referred:

The contracting department representative forwards a letter and the State questionnaire to the training provider (Attachment 2). The training provider completes the questionnaire and submits to MHEC for status designation – exempt or non-exempt. This step may be skipped if MHEC has already determined the status.

Status' include:
Non-exempt training providers are those who must obtain MHEC approval to operate legally in Maryland.

Exempt training providers are defined as those who, because of the student population served or type of training offered, do not have to obtain MHEC approval to operate legally in Maryland.

MHEC forwards a designation letter to the training provider with a copy to the contracting representative. If the representative does not receive a copy of the letter, MOED will accept a copy of the MHEC designation letter from the vendor.

Upon receipt of the designation letter, the contracting representative forwards a letter (Attachment 3) and a Pre-Award Survey (Attachment 4) to the training provider as well as a copy of the application process (Attachment 5).

The training provider completes the Pre-Award Survey, and returns it to the contracting representative.

Upon receipt of the Pre-Award survey, the contracting representative conducts a site visit, and completes a check-off list (Attachment 6).

If incorrect or missing information is identified in the Pre Award Survey, the contracting representative sends a letter to the vendor requesting additional or amended information (Attachment 7).

After the vendor submits the amended information, the contracting representative forwards the vendor packet to the BWDB Liaison. The vendor packet includes the Pre-Award Survey and local labor market information for the occupational training area being requested. The BWDB Liaison arranges for review by the BWDB Executive Committee.

When the BWDB gives its recommendation to consider the vendor for placement on the ETPL, the contracting representative sends a letter to MHEC (Attachment 8) signifying that the BWDB is recommending this vendor, and requesting that the vendor be added to the approved list. Written notification is sent to the vendor notifying them of the BWDB's recommendation (Attachment 9).

If the BWDB reviews the course offerings and does not accept the proposal, a denial letter (Attachment 10) is sent to the vendor by the MOED contracting representative.
Any appeal process is conducted through the State Department of Labor, Licensing and Regulation (DLLR), and vendors are notified of the outcome within sixty (60) days.

ITA vendors will be considered eligible for inclusion when:

Group 1 - Apprenticeship programs registered under the National Apprenticeship Act; programs that lead to a baccalaureate, associate, or certificate and provided by post-secondary institutions – community colleges, public and private 4 year colleges and universities; some private career school approved by MHEC.

Group 2 - Pre-Awards survey required for providers not listed in Group 1 who offers training that prepares individuals for gainful employment, and who are legally eligible to provide such training. These include: apprenticeship courses not registered under the National Apprenticeship Act; certificate programs offered by private career schools not approved by MHEC; contracted classroom training for targeted populations, such as those provided by CBO's.

Responsibilities of the Customer regarding application for an ITA

- Use the O*NET and other resources to document labor market demand, and/or collect information from specific employers that a demand exists for the selected occupation at a sustainable wage.
- Compare all the information obtained about the training vendors and the course of interest, and with the assistance of a CDF, select a course that best matches the assessments and interests of the customer.
- Make an on-site visit to the vendor obtaining an acceptance letter on school/ company letterhead.
- Complete the ITA Application Packet, ensuring that any financial assistance required to pay for training above the funding cap is documented.
- If applicable, apply for financial aid, and submit required documentation.
- Submit a completed packet to the CDF no less than four (4) weeks prior to the class start date. Each packet must contain the expected start date. Training must begin within sixty (60) days of the approval date unless there are extenuating circumstances as outlined in the" Welcome To ITA" packet (Attachment 11), or the school semester start does not fall within sixty (60) days of approval. **Under no circumstances, can the training start date be more than six (6) months from the approval date. Training for customers who do not begin on the determined start date will be voided, and dollars de-obligated**. Customers who are still interested in training will be required to resubmit another ITA application.
- If the ITA packet is incomplete or needs adjustments, the customer has one (1) week from the date the packet is returned to resubmit to the CDF.
- For all course trainings (single and multiple), the customer must notify and provide documentation to the CDF regarding completion of each training course. In cases where the customer takes multiple courses, completion documentation for the first course must be submitted to the CDF prior to the start date of subsequent approved training courses.
- If training is delayed, it is the customer's responsibility to obtain a new Letter of Acceptance with a new start date.
- While enrolled in training, proof of attendance (attachment 12) must be submitted to the CDF at least monthly while in the classroom. Customers who are registered for an online class must provide monthly proof of participation during enrollment in class. (i.e. homework assignments, printout of class assignments, grade summary, etc.)
- Notify CDF regarding attainment of a job, and provide employment information.

Responsibilities of the CDF regarding application for ITA

- Confirm customer has not participated in supported training within the last three (3) years.
- Provide accurate information to customers at all times.
- Verify that vendor/school and the requested course is on the Maryland Higher Education Commission (MHEC) list of WIOA approved vendors/schools.
- Check the ITA MOED List of Approved Agreements on the ITA shared drive to confirm that there is an existing agreement with the vendor/school for that course. **Training will not be approved unless there is an agreement in place, and the vendor appears on the approved list.**

- If there is no agreement in place, notify the CDF Supervisor who in turn will send the Contracts Manager a ***Request for New ITA Vendor/ Course*** form (attachment 13) and cc the Workforce Operations ITA liaison. Inform the customer that MOED does not have a current agreement with the chosen vendor/school, but that every effort will be made to develop one. It is advisable to suggest that the customer should investigate using an approved vendor.
- Provide current information to the customer regarding the status of agreement development with the vendor, and notify the customer when the new agreement is approved.

If the customer is determined not eligible for training during review, offer the opportunity to participate in other services.

- Ensure that the customer has received financial aid information.
- Verify use of Pell Grant or other assistance if applicable.
- Work with the customer to determine what support services may be needed during training (i.e. transportation, uniforms, physical examinations, tools etc.).
- Review the ITA Application packet, and complete the ITA Customer Application Summary and Checklist form (attachment 14). Be sure to include any financial assistance the customer will receive (PELL Grant, scholarships, etc.) as well as the expected start date. Incomplete Summary Sheets will be returned to the CDF by the CDF Supervisor or contracting department, and may negatively impact the start of training.
- Submit the packet to the Career Center Supervisor/ Manager for review. It is the responsibility of the Workforce Operations Management Team to ensure all ITA packets meet the eligibility requirements outlined in this document and that internal reviews are periodically conducted in preparation for external audits.
- Once the packet is approved, the supervisor/ manager will email the ITA Customer Application Summary and Checklist, transmittal form, and Acceptance Letter from the School to the contracting department ITA email address.
- If the packet is not approved, the CDF will discuss the results of the packet review with the customer and address any areas of concern, assist the customer in correcting missing or incorrect information, and resubmit within one week to the Career Center Supervisor/ Manager. Resubmission of packet is limited to two (2) times.
- Support such as uniforms, certification tests, etc., that cannot be built into the cost of the training must be paid by the customer. If uniforms are available from the school/vendor, they must be added to the Task Order.
- After receipt of the task order and authorization letter from the contract specialist, give the customer a copy of the Vendor Letter of Authorization (Attachment 15) and "Welcome to ITA" document. Inform them of the location and start date of training.
- Once the customer begins training, the CDF will verify the start date of the training with the school after the third day of enrollment. The CDF will notify the ITA Liaison and contract specialist that the customer has begun training.
- If training is delayed, notify contract specialist of delay, enter Training Delay service in the MWE, and work with customer to obtain a new start date.

- Provide On-Going case management during time of enrollment and follow-up for both completers and non-completers.
- Conduct follow-up with the customer no less than once a month to monitor attendance and ensure that the customer is successfully participating.
- Follow-up documentation must be included in customer's file.
- Notify the contract specialist via e-mail if the customer drops out of class. The contract specialist will be able to evaluate the refund policy and credit the amount of any applicable refund to the proper budget account number.
- Once a customer is no longer in the program (either drops or completes), key the ITA leave into the MWE or appropriate reporting system and document any credentials received.
- Inform the customer of intensive job search options prior to the completion of training and assist with development of a resume.
- If the customer obtains unsubsidized employment, verify the job with the customer, and collect placement information.
- Enter the verified employment information into the MWE or appropriate data collection system.
- Using the WIOA placement form, verify the following employment information with the customer:
    - ✓ Employer's Name
    - ✓ Employer's Address
    - ✓ Job Title
    - ✓ Start Date
    - ✓ Hourly Wage
    - ✓ Hours per week
    - ✓ Availability of medical benefits, unemployment insurance, other fringe benefits
    - ✓ Credentials obtained
- If the customer does not obtain employment, provide counseling in job search activities, enroll in Job Search Assistance, and refer to the business service representative who will match the customer to appropriate jobs based on skills obtained in training.

Responsibilities of the CDF Supervisor

- Only the CDF Supervisor and the Career Center Manager can review the ITA packets prior to submission to the contracting unit. It is managements responsibility to review each packet for accuracy, proof of eligibility documentation, and based on assessments and labor market information determine an appropriate match for training. Approved packets will be signed off by management or returned to the CDF for corrections and resubmission. Management approval must occur within forty-eight (48) hours of receipt from the CDF.
- Approved packets will be retained by the Career Center CDF. The career center manager or their designee will email the approved Checklist to the designated contracting unit staff member for review. There must be at least three (3) weeks between the date the information is submitted to contracting and the start date of the class. Any exceptions must be approved by the Contracting Manager prior to sending the customer information to the contracting department.
- Conduct spot checks of customer folders to ensure that the Core and Intensive services have been documented.
- Perform monthly quality review of CDF case files.

Responsibilities of the Workforce Operations ITA Liaison

- Monitor data for accuracy including enrollments, overdue leaves, completions, credentials, and job placements.
- Prepare a weekly ITA report for each center to be distributed to the WO Division Director and managers outlining the status of each centers ITA funding allocations and tracking of referrals.
- Act as point of contact between Workforce Operations, MOED Contracting Unit, PEDS, and Vendors.
- Vendors are to report placement information to the ITA liaison at least 60 days after the placement has been captured.

Responsibilities of the Central Contracting Unit

- Oversight responsibility for contract development and monitoring for vendors enrolling customers into ITA's and payment of invoices submitted by vendors. Also includes monitoring relevant customer fiscal data to ensure correctness and consistency of information and available dollars. Process and monitor Letters of Authorization, data entry of starts, submission of Task Orders, and comparison of MWE and fiscal data.
- Ensure the completeness and correctness of the contracting agreement
- Verify that there is an existing agreement with the selected vendor.
- Verify that the course(s) requested is/are on the MHEC list.
- Oversight responsibility for the new vendor process to facilitate application for the approved vendor list.
- When the school is approved by MHEC, conduct a Pre Award Survey.
- Develop and maintain a comprehensive ITA report using the Fundware system as a base. Report must contain customer enrollment information as well as fiscal data.
- Assign ITA service into MWE or appropriate reporting system.
- Determine appropriate funding source based on customer's eligibility and verify fund availability.
- Forward two copies of the Task Order (attachment 16) to the vendor for completion or course information and signature.
- Process Letter of Authorization within five (5) business days of approval date. Forward a copy to the CDF, center supervisor/ manager, CCN ITA liaison and Vendor via email. Send the original Letter of Authorization and two (2) copies of the Task Order to Vendor via U.S Postal Services. Authorization letter must include the fundware obligation number.
- Enter case information into Stage 10 of Fundware using data from the Letter of Authorization.
- Review the balance in Fundware to ensure adequate funding to support training.
- Key account information into Fundware - Tabs 1,2, 3, and 4 These tabs include:

  Tab 1: Vendor name, customer name, CDF initials, Contract Specialist name, total authorized amount of training, which includes uniforms, books, etc. outlined on the Task Order.

  Tab 2: Customer's Social Security #, actual start date and estimated end date, center code, status codes (Pell Grant, dropped out, class cancelled, or non-start)

Tab 3: Course offering name, institution fees, books, certification fees, school ID number, contract name.

Tab 4: Assign dollar amount to one or more grant budget account numbers. Percentage must be included if multiple accounts are being charged.

- Verify correctness of information on Task Order when signed copies are received from the vendor. Return one copy of the approved T.O. to the vendor; maintain one copy for MOED/Contracting files.
- Key ITA Service into MWE or appropriate electronic reporting system.
- Attempt to resolve issues related to payment of courses for customer.
- Process weekly ITA data/reports (ITA Transmittals, Training Slot Status, and Training Cost Average), and forward to PEDS for calculation of performance data.
- Monitor fundware obligations in Stage 10. If obligation has not moved to Stage 15 within fifteen (15) calendar days from start date, call ITA liaison to verify customer began training. Resolve problems and propose de-obligations.
- Monitor refunds for students who drop out during the allowed dropout period, and notify the school that a refund is due. Process a memo to the Fiscal Department for refunds crediting the amount of the refund to the proper budget account number. Refunds are based on the individual school/vendor policy for dropouts.
- Review the balance in Fundware to ensure adequate funding to support training. Notify Career Center General Manager, Workforce Operations Assistant Director, and Comptroller when funding level in any funding source has reached an 80% expenditure level.
- Review weekly Fundware reports, and correct any discrepancies related to program activity. Monitor the movement through the appropriate stages.
- Approve invoices within five (5) working days of receipt. Prepare and submit invoices to Fiscal. Fiscal then has five (5) working days to process the invoice and forward it to City Finance for payment. The normal amount of time for City Finance to process payment is forty five (45) days. Invoices cannot be paid if movement though the stages is incomplete.

Audit Responsibilities

At the request of any local, state, or federal audit:

- The career center responsible for registering the jobseeker will also be responsible for the participant record including proof of eligibility documents; prints of enrollments, completions, and job placements; ongoing attendance/ class participation records; and proof of obtained credential.
- Central Contracting Unit will be responsible for allowable costs on the task order, invoice receipt and payment, and proof of any applicable refunds.

ITA Responsibility Quick List

Task/ Event	Customer	Career Center Staff	Central Contracting Unit
ITA Information Session	Attends orientation	CDF conducts orientation	
Assessments including TABE Testing	Determine career interest and eligibility for training	Discuss assessments with customer to determine "best match"	
ITA Application	Must be completed in full including LMI, site visit, complete cost of training (pre-requisite course, certification course, books, uniforms, etc), and alternate start dates	CDF assists customer with completion of packet Submitted to center management for approval	
Application Summary and Checklist		Completed by CDF Signed off by center management Approvals emailed to contracting with transmittal form and Letter of Authorization (LOA)	Reviewed by CS for completeness Incomplete forms will be returned to center manager Complete forms will be emailed to contracting ITA email with cc to CCN ITA Liaison, CDF, and Center Manager or their designee. Fundware obligation entered in stage 10
Transmittal form			Names are logged onto the cumulative spreadsheet for reporting
Authorization to Start Training		CDF notifies customer of start date and presents *Welcome Packet*	Task order received from school. LOA is completed emailed to CDF with cc to CCN ITA Liaison, and Center Manager or their designee

Start Date of Training	Customer begins training or notifies CDF if they are unable to start	CDF Verifies start date start and forwards verification to contract specialist	Fundware obligation moved to stage 15 Service entered into the MWE or appropriate reporting system.
Start Date Postponement	If postponed because of customer, customer notifies CDF It is the customers responsibility to obtain a new start date and updated Approval Letter	If postponed because of vendor, CDF notifies customer. ITA *Customer Application Summary and Checklist* is revised once new start date are obtained Training delay service entered into the MWE.	New letter of Authorization is crafted and sent to vendor.
During class enrollment	Submit attendance (or progression for on-line classes) at least monthly	Follow-up at least monthly to monitor attendance and resolve barriers that may pop-up If attendance is not received, CDF must follow-up with customer or school to determine status. Begin job search	Process invoice or follow-up if invoice has not been received within 30 days of start
Drops before Completion	Customer notifies CDF	CDF notifies Contract Specialist	CS examines refund policy and processes refund if applicable
Successfully completes class	Customer notifies CDF	CDF enters end date information into appropriate MIS and makes copies of credentials received. Job placement services continue. IEP is updated.	CS monitors school for compliance with agreement
Unsubsidized employment is obtained	Employment is reported to the CDF	Employment information entered into appropriate MIS. Follow-up and retention information collected.	

List of Attachments

Attachment 1	ITA Application Packet
Attachment 2	Training Provider State Questionnaire
Attachment 3	Explanation Letter for New Provider
Attachment 4	Pre-Award Survey for New Provider
Attachment 5	Application Process for New Provider
Attachment 6	Site Visit Check List for New Provider
Attachment 7	Letter for Additional Information for New Provider
Attachment 8	Letter to MHEC for New Provider
Attachment 9	Approval Letter to New Provider
Attachment 10	BWID Denial Letter for New Provider
Attachment 11	Customer *Welcome to ITA* Packet
Attachment 12	Customer Attendance Log while in Class
Attachment 13	Request for new ITA Vendor/ Course
Attachment 14	ITA Customer Application Summary and Checklist Form
Attachment 15	Vendor Letter of Authorization
Attachment 16	Task Order

BALTIMORE CITY MAYOR'S OFFICE OF EMPLOYMENT DEVELOPMENT

Individual Training Accounts

Application

Contact Information

Name:	
Soc. Sec. #:	
Address:	
City/State/Zip:	
Home Phone #:	( )
Message Phone#:	( )
E-Mail Address:	

Individual Training Accounts

This application collects the data needed to make an informed decision about the occupation, type of training and the training provider that will help you achieve your career goal. Please respond to each section and provide complete information.

Training is restricted to customers who can verify residency in Baltimore City.

Jobseekers interested in attending training must submit a completed application packet to the CDF no less than four (4) weeks prior to the class start date. The CDF is available to assist you to ensure the packet is complete.

Training Information

1. What type of training is being requested?

2. Do you have any work history in this career field? If yes, please briefly describe.

3. Select (circle) the MHEC approved vendor that offers this course.

All State

Baltimore City Community College

Community Colleges of Baltimore County

- Catonsville
- Dundalk
- Essex

SW Design

American Health Alliance Institute

Jane Addams Resource Corporation

MCAT

Towson

Other:

JUSTIFICATION

Approval of your training plan requires that you clearly define and justify why you feel you are best suited for this training. Your response to the questions below will help determine your suitability for the training selected.

1.	**List specific reasons for requesting training in this particular field.**

2.	**List specific skills, abilities and certifications you will obtain from the training.**

TRAINING RESEARCH

Answer the following questions regarding the career path and training provider you have selected. This information will ensure your understanding of the training commitment necessary to complete training and obtain employment.

Name of College and Course: Certificate Courses Only	
Labor market demand should reflect the availability of jobs in Maryland:	
Attach two (2) types of documentation verifying the availability of jobs in the career for which you are requesting training (internet job search sites, newspaper, job announcements, etc.)	
1. What type of jobs do people obtain upon completion of training?	
2. What was the entry wage for people who obtained jobs?	

4. What are the entry requirements for this occupation?
5. Use O*Net to obtain information about the occupation you have chosen. Attach a copy of the occupation and summary reports.
Training Requirements:
Applicant must be able to meet the entry requirements and commit to the hours required for successful completion of the curriculum. Please attach a copy of the course catalog for your selected curriculum.
6. What are the entry requirements for this training?
7. How long will it take a student to complete this training? (must be completed within 12 months of start date)
8. List the start and end dates of the next two (2) classes scheduled.

COST OF TRAINING

Please provide an estimate of the total cost of training.

Training Expenses	Course 1 Name	Course 2 Name	Amount
Tuition			$
Application Fee			$
Lab Fees			$
Books			$
Tools			$
Uniforms			$
Certification Fees			$
Other (Please explain)			$

Sub-total Cost of Training (add above costs)			**$**
Financial aid (subtract from sub-total)			**$ -**
Costs you must pay (Subtract)**			**$ -**
Funding Amount authorized by MOED			**$**
TOTAL TRAINING COST			**$**

Financial Aid

Students must apply for financial aide (Pell Grant) as a requirement of certain programs. Students are responsible for costs not covered under this agreement. The trainee must pay for support items such as uniforms, certification tests, books, and supplies that are not built into the cost of the training.

Does your selected course accept financial aide for payment? ☐ Yes ☐ No

Have you applied for: ☐Pell Grant ☐ Student Loan ☐ Scholarship ☐ Other:
_____

If you were approved for financial assistance, please provide a copy of your Student Aid Report (SAR).

If you were not approved for financial assistance, please provide a notarized written statement indicating how the remaining balance will be paid.

Attachment 2A

SAMPLE COVER LETTER FOR QUESTIONNAIRE TO POTENTIAL TRAINING PROVIDERS

December 12, 20XX

X
X
X
X

Dear Mr./Ms.

Thank you for expressing an interest in becoming a potential Individual Training Account (ITA) service provider for the Mayor's Office of Employment Development (MOED).

MOED will be using the federally required Eligible Training Provider Listing (ETPL) to identify approved trainers for individuals receiving services under the Workforce Innovation and Opportunity Act. Approval to be placed on the list is done in conjunction with the State Department of Labor, Licensing and Regulation (DLLR) and the Maryland Higher Education Commission (MHEC).

MHEC has determined the criteria, and is the entity that has final approval of applications from training providers who are requesting to be included as part of the approved list.

Enclosed you will find a Training Provider Pre-Award Survey. Please complete this form and forward to the individual denoted on page three. After reviewing the questionnaire MHEC will forward a designation letter to you and me. Upon receipt of this designation letter, I will send you an application request for placement on the ETPL.

Sincerely,

XXXXX
Contracts Manager

Attachment 2B

MARYLAND HIGHER EDUCATION COMMISSION
PRIVATE CAREER SCHOOL (PCS)
TRAINING QUESTIONNAIRE

Please complete and submit this questionnaire to the Maryland Higher Education Commission in order to determine whether Commission approval is required for your training to be offered in Maryland. Along with the questionnaire, please provide all documents requested below. Upon review, you will receive written notification of the Commission's determination. Please allow two to four weeks for written notification.

Training Provider: _____

Complete Address: _____
Street Address *City* *State* *ZIP*

Telephone: _____ Fax: _____ Email: _____

Website: _____

Contact Person: ☐ Mr. ☐ Mrs. ☐ Ms. ☐ Rev. ☐ Dr. _____
Last Name *First Name* *MI*

I. TRAINING DESCRIPTION

Please provide a brief description of your training, including the training title (e.g., Nursing Assistant, Computer Technician, etc.), and as it would be described in advertisements or on the Internet.

_____

II. WHAT IS THE PURPOSE OF YOUR TRAINING?

Please check all boxes below that are applicable to your training. Be sure to list or identify all requested details. The purpose of your training is to:

☐ A. PREPARE INDIVIDUALS TO OBTAIN GAINFUL EMPLOYMENT.
Please list below the occupations for which graduates of your training will qualify.

_____

☐ B. PREPARE INDIVIDUALS TO OBTAIN INDUSTRY CERTIFICATION(S).
Please identify below the industry certifications and exams for which your training will prepare graduates.

_____

☐ C. PREPARE INDIVIDUALS TO OBTAIN LICENSURE.
Please identify below the licenses and licensing exams for which your training will prepare graduates.

_____

☐ D. ENHANCE AN INDIVIDUAL'S SKILLS AND KNOWLEDGE, BUT THE TRAINING DOES NOT PREPARE THEM TO OBTAIN TRAINING-RELATED EMPLOYMENT.
Please identify below the enrichment skills and knowledge that your training will provide.

_____

☐ E. OTHER. *Please describe in detail.*

_____

III. HOW IS YOUR TRAINING DELIVERED?

Please check all boxes below that are applicable. If "Other", please fully describe your training. Your training is delivered:

- ☐ A. By an instructor in a room or classroom.
- ☐ B. Online.
- ☐ C. Through a combination of classroom and online courses.
- ☐ D. By other training delivery method(s). *Please describe in detail.*

  _____

IV. TO WHOM ARE YOU OFFERING AND DELIVERING YOUR TRAINING?

Please check all boxes below that are applicable. Be sure to identify or describe all requested details. Your training is:

- ☐ A. Open to and offered to the public.
- ☐ B. Delivered to one student at a time on an individual basis.
- ☐ C. Delivered to groups of students at one time.
- ☐ D. Delivered to the private homes of Maryland individuals entirely by an out-of-state entity through distance education. All aspects of this business operate from outside of Maryland. *Name and provide contact information for this entity:*

  _____
- ☐ E. Offered to professionals in a specific occupation, and is comprised of refresher or continuing education instruction sponsored by a professional group for the exclusive use and benefit of the members of that entity. *Name and provide contact information for this entity.*

  _____
- ☐ F. Offered exclusively for your own employees.
- ☐ G. Offered only to those enrolled in a registered apprenticeship training program or other training offered by a union or organization exclusively for their members. *Name and provide contact information for this entity.*

  _____
- ☐ H. Open to and offered to the public as a postsecondary instructional program that is part of a church or other religious institution for the sole purpose of learning the particular religious faiths or beliefs of that church or religious organization. *Name and provide contact information for this entity.*

  _____
- ☐ I. Other. *Please describe in detail.*

  _____

V. ENCLOSURES

Please enclose the following items along with your completed questionnaire.

Enclosure 1: A completed Training Program Description Form for each program you are offering or plan to offer.

Enclosure 2: If any currently exist, copies of advertisements or promotional materials used to market your training or recruit students.

Enclosure 3: If any currently exist, copies of bulletins, school catalogs, student handbooks, enrollment agreements, or other materials provided to prospective and enrolled students.

AFFIDAVIT: This is to affirm that the information provided above and in the enclosed documents are true and correct.

_____
Typed Name of Chief Executive Officer

_____ _____
Signature of Chief Executive Office *Date*

RETAIN A COPY FOR YOUR RECORDS, AND THEN MAIL ALL MATERIALS TO:

Associate Director for Private Career Schools
Maryland Higher Education Commission
10th Floor
6 N. Liberty Street
Baltimore, Maryland 21201

Questions: 410-767-3403
Facsimile: 410-332-0270

Attachment 3

Sample Cover Letter to Vendor for Pre-Award Survey
to Become an Approved Trainer

December 12, 20XX
X
X

X

Dear Mr./Ms.

We have received notice from MHEC regarding your status to be listed as part of the State's Eligible Training Provider List.

MOED, in conjunction with the State of Maryland's Department of Labor, Licensing and Regulation (DLLR), will be using the ETPL to determine vendors who will provide training for individuals receiving services under the Federally funded Workforce Investment Act of 1998.

DLLR has secured the assistance of the Maryland Higher Education Commission (MHEC) to initiate the pre-requisites for those who request status determination and placement on the list as a recognized training provider.

Enclosed you will find the Pre-Award Survey that will be used by MOED's Workforce Development Board to make a recommendation to DLLR on whether your organization should be approved to provide training services through the Mayor's Office of Employment Development. I have also enclosed the State Performance Measures Requirements for providers of training through Individual Training Accounts.

We require that the survey be completed and submitted to me electronically. A copy is available on the MOED website www.oedworks.com. Please complete this Pre-Award Survey, and return it to me via e-mail – rchambers@oedworks.com. I will then contact you to make an appointment for a site visit. Upon completion of this visit, this information will be sent to our Workforce Development Board for review.

Submission of the survey in a format other than e-mail may delay the process in scheduling your proposal for the

Board review.

If the BWDB makes the recommendation that you be placed on the ETPL, I will forward a letter of acceptance to your organization.

I look forward to our continued coordination in providing services to those in need of training.

Sincerely,

XXXXX
Contracts Manager

Attachment 4

Workforce Innovation and OpportunityAct
Training Provider
Pre-Award Survey

The following information will be used to qualify training providers who wish to offer training to eligible job seekers funded by the Workforce Innovation and Opportunity Act. This application must be completed and returned to the local Workforce Development Board representative.

I. ORGANIZATIONAL INFORMATION

Organization Name:_____

Organization Address:_____

Telephone Number:(____)_____Fax Number:(____)_____

Contact Person:_____ Title:_____

E-mail:_____ Website:_____

State Identification Number:_____ Federal Identification Number:_____

Organization Classification:

- □ Unit of Government:
  □ City □ County □ State □ Consortium
- □ Not-For-Profit (tax exempt under IRS Code 501(c)___)
  □ Community-Based Organization
- □ Educational Institution
  □ 4+year □ 2 year □ Proprietary Post Secondary
- □ Exempt from Maryland Higher Education Commission guidelines (Please attach copy of letter if in Maryland.)
- □ Commercial (For-Profit) Organization
  □ Proprietorship □ Partnership □ Corporation (“S” or “C”)
- □ Franchise If checked, what is Affiliation?_____

Organization Principals: Please complete applicable sections. Add a separate sheet if necessary.

□ Owners/Partners (Commercial Organizations): List_____

_____

□ Management: CEO/Executive Director:_____

Controller:_____

Board of Directors:

Chairperson:_____

Vice Chair:_____

Secretary:_____

How long have you been in business?_____ years

Financial Information

Does the organization have any outstanding unresolved audit deficiencies with any Federal, State, or local agency?

□ Yes □ No (If yes, please provide an explanation and a description of your corrective actions)

_____

_____

_____

_____

_____

_____

_____

II. REFERENCES: List at least three organizations with whom you have conducted business, or for whom you have operated programs under contract, who can attest to the quality and effectiveness of your services.

Organization:_____

Contact person;_____ Phone: (____)_____

Describe experience:_____

Organization:_____

Contact person:_____ Phone: (____)_____

Describe experience:_____

Organization:_____

Contact person:_____ Phone: (____)_____

Describe exeperience:_____

III. COURSE INFORMATION

SPECIFIC INFORMATION must be furnished for each course or program. **If additional courses are offered, please copy this page**, fill it out, and attach the copy to your application.

Name of course:_____

Description and objectives:_____

_____

_____

Total clock hours or credit hours:_____

Training Location (s):_____

Timing of Course/Program _____
(Day, Night, Weekend)

Open Entry/Exit ☐ Yes ☐ No

Admissions requirements and/or Competency Standards: _____

_____

Student/Instructor Ratio _____
Average Class Size _____
Cost of Course/Offering _____
Additional Fees or Costs _____

PELL Eligible Course ☐ Yes ☐ No
Federal Guaranteed Student Loan ☐ Yes ☐ No
Scholarships ☐ Yes ☐ No
Other Financial Aid ☐ Yes ☐ No

Is training course or program for (Specify):

_____ Industry Certified Skill Standards _____

_____ Licensed Occupation _____

_____ Diploma _____

_____ Credit _____ Non-Credit

For your most recent fiscal year, please provide the following performance information.

Time Period: From _____ To _____

Total Number of Enrollments _____ Completion Rate _____

Job Placement Rate _____ Avg. Wage at Placement _____

IV. TRAINING PROGRAM COMPARISON

COMPARE THE PROPOSED TRAINING PROGRAM TO SIMILAR PROGRAMS offered in the Baltimore area that are listed on the MHEC state eligible training provider list found at https://www.mhec.state.md.us/Career/WIOA/searchfor.asp.

SPECIFIC INFORMATION must be furnished for each course or program. **If additional courses are offered, please copy this page**, fill it out, and attach the copy to your application.

TRAINING PROGRAM: _____

COMPARISON CHART

Training Provider	Training Program Name & Total Clock Hours	Tuition	Program Length

V. LOCAL LABOR MARKET INFORMATION

TRAINING PROGRAMS MUST PREPARE INDIVIDUALS FOR EMPLOYMENT IN GROWTH OCCUPATIONS within the Baltimore Workforce Development Board's targeted industries: HEALTHCARE/LIFE SCIENCE, BIOSCIENCE, BUSINESS SERVICES, INFORMATION/COMPUTER TECHNOLOGY, HOSPITALITY/TOURISM, CONSTRUCTION, PORT AND PORT RELATED SERVICES, AND SUSTAINABLE ENERGY AND ENVIRONMENTALLY-DRIVEN SERVICES.

LIST THE GROWTH OCCUPATIONS for which the program prepares individuals for employment. Include the projected growth, wages and certification requirements. Labor market information is available at http://www.dllr.state.md.us

GROWTH OCCUPATIONS CHART

OCCUPATION	PROJECTED GROWTH				CERTIFICATION REQUIREMENTS	AVG. ENTRY WAGE
	Annual Growth	Annual Replacement	Total Annual Openings	Ranking (Top 50, 100)		

VI. ATTACHMENTS

The following documents **MUST** be attached:

□ Articles of Incorporation
□ Yes □ No □ Not applicable

VII. ASSURANCES

Please check all that are applicable.

□ Organization is an EDUCATIONAL INSTITUTION.

Are you ACCREDITED? □ Yes □ No

By whom:_____

If NO, please explain:_____

□ Organization has tuition schedule and/or catalog.

□ Organization has a Drug-Free Workplace Policy in place.

□ Organization has an Equal Employment and/or Equal Educational Opportunity Policy.

□ Organization is in compliance with the Americans with Disabilities Act.

□ Organization has a Liability Insurance Policy in effect.

□ Organization is licensed to conduct business.

Name of licensing agency:_____

License number:_____

VIII. AUTHORIZATION:

I, _____, _____
(Name) *(Title)*

_____, hereby certify and represent the
(Applicant Organization)
following:

1. That I am authorized to sign this document;

2. That the information contained in this application and all attachments is true and correct to the best of knowledge and belief;

3. That _____ (applicant organization) will permit official representatives of the Workforce Development Board or its Agent(s) access to its facilities, staff and records for verifying the information contained in this application and collecting any additional information related to its qualifications as a goods/service provider;

4. That _____ (applicant organization) hereby authorizes the Workforce Development Board to contact any or all of the references named herein, in order to verify past performance.

SIGNED THIS _____ DAY OF _____

Signature:_____

Printed name/title:_____

FOR WORKFORCE DEVELOPMENT BOARD OFFICE USE ONLY

Reviewed by:_____

Date reviewed:_____ Date Site Visit:_____

BWDB Recommendation Date:_____

Attachment 5

Visit the Maryland Higher Education Website at:
https://www.mhec.state.md.us/career/WIOA/WIOAForms/OtherMarylandTrainingProvidersindexpage.asp

Creating a state of achievement

Career and Workforce Education

APPLICATION PROCESS FOR NOMINATING PROGRAMS TO BE ON THE MARYLAND ELIGIBLE TRAINING PROVIDER LIST FOR THE WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA)

Other Maryland Training Providers

For training providers making initial application to be added to the Maryland Eligible Training Provider List of Occupational Training to be eligible for WIOA funding, follow **Steps 1, 2, and 3.** Training providers that are already on the Maryland Eligible Training Provider List, begin with **Step 3.**

Step 1: To nominate a training provider to be added to the Maryland Eligible Training Provider List, it first must be established that the training provider is legally authorized to offer post-secondary training in Maryland.

- If the training provider does **not** have a letter from the Maryland Higher Education Commission (MHEC) granting **exempt status**, then a Training Provider Questionnaire must be completed by the training provider and submitted to MHEC for review and status determination **prior** to continuing to **Step 2.**
- If the training provider has a letter from MHEC granting **exempt status**, continue to **Step 2.**

Step 2: After receiving a letter from MHEC granting exempt status, to nominate an **exempt** training provider for inclusion on the Maryland Eligible Training Provider List, the training provider must submit the following completed document:

- WIOA Data/SSN Collection Affirmation Form: -- to be completed, signed by the training provider.

Step 3: After receiving a letter from MHEC granting exempt status, to nominate program(s) to be added to the Maryland Eligible Training Provider List, the **exempt** training provider must submit the following documents for **each** occupational training program:

- Program Description and Nomination Form -- to be completed by the training provider and signed by authorized staff of a Maryland Local Workforce Development Board (LWDB) indicating the LWDB's approval to add the program to the WIOA State List.
- Verification of Minimum Program Performance: -- to be completed by the training provider documenting that an existing program has at least a 61% employment rate for program graduates. A program in operation for fewer than twenty-four months is exempt from this requirement.

  Note: The data **MUST** be sent in electronic format, either on a CD, DVD, or via e-mail in MS-Word or Excel file format. If sent via e-mail, the MS-Word or Excel files **MUST** be password-protected with the password sent in a separate follow-up e-mail.

Note: Before a program is eligible to be added to the Maryland Eligible Training Provider List, a training provider must submit a **complete application** (with **all** required forms completed and signed) to:

Maryland Higher Education Commission
6 N. Liberty Street, 10th Floor
Baltimore, MD 21201
Attention: David Jorgenson
Fax: 410-332-0270

Attachment 6

ITA Site Visit Checklist

General Data
__Location
__Occupational Training Title
__Type of Training/Description
__Training Qualifications
__Length Of Training
__Training Facilities
__Occupational Growth Potential
__Training Method
__Curriculum
__Prerequisites/Admission Requirements
__Credentials Earned
__Estimated Waiting Period To Enter The Program
__Financial Assistance Accepted
__Teacher/Pupil Ratio
__Length Of Training/Course
__Start/End Dates
__Days & Hours Of Training
__Job Placement Component
__Special Populations Served
__Interview With Training Program/Interview With Employer
__Special Job Prep Or Courses Offered

Cost Data
__Tuition
__Fees
__Refund Policy
__Books
__Materials
__Uniforms
__Tools
__Certification Fees

Performance Data
__Enrollments
__Graduation Rates/Completions
__Placements
__Placement Wages
__% Of Placements With Health Benefits

Attachment 7

SAMPLE LETTER TO VENDOR REQUESTING ADDITIONAL INFORMATION

December 11, 20xX

X
X
X
X

Dear Mr./Ms.:

A review of the material you submitted in the Pre Award Survey to be approved for the Eligible Training Provider Listing (ETPL) indicates that there is some required information that is missing.

We must have the following before we can forward your survey to the Baltimore Workforce Development Board for approval. Additionally, the State Department of Labor, Licensing, and Regulation will not give consideration to a training provider whose information is incomplete.

List Problems

Please submit the required information to me no later than two (2) weeks from the date of this letter.

Sincerely,

XXXXX XXXXXX
Contracts Manager

Attachment 8

Sample Letter to MHEC Requesting New Vendor on Eligible Training Provider List

December 12, 20XX

David Jorgenson
Maryland Higher Education Commission
6 N. Liberty Street, 10th Floor
Baltimore, MD 21201

Dear XXX:

The Mayor's Office of Employment Development (MOED), on behalf of the Baltimore Workforce Development Board (BWDB), is forwarding completed forms for a "Nomination of Program to be on State List of Occupational Training Providers for Workforce Innovation and Opportunity Act (WIOA) – Exempt School".

Attached are six (6) completed forms for the following course offerings to be provided by ABC Company.

1. XXXXXX
2. XXXXXX
3. XXXXXX

The BWDB has reviewed the Pre Award Survey and labor market information for this vendor, and is recommending approval from DLLR to have this vendor placed on the Eligible Training Provider List.

If you require additional information, please contact Richard Chambers, Contracts Manager for the Mayor's Office of Employment Development at (410) 396-1261.

Sincerely,

Jason Perkins-Cohen
Director

Cc: Richard Chambers
ITA Contract Specialist
Vendor

Attachment 9

Sample Letter to Vendor re BWDB Recommendation to Place on Eligible Training Provider List

December 12, 20XX

X
X
X
X

Dear Mr./Ms.:

The Baltimore Workforce Development Board (BWDB) has reviewed the course offerings submitted by ABC Company to provide occupational skills training under the Federally funded Workforce Innovation and Opportunity Act (WIOA) Individual Training Account (ITA) initiative.

The BWDB has accepted the course offerings, and your proposal has been forwarded to the Maryland State Department of Labor, Licensing and Regulation (DLLR) with a recommendation that these courses be added to the State's Eligible Training Provider Listing (ETPL).

When notification has been received from DLLR that your request has been approved, Mr. Richard Chambers, the Contracts Manager for the Mayor's Office of Employment Development, will prepare an ITA vendor agreement for your review and signature. It is anticipated that this document will be ready for signature on/about (Month) XX, 200X.

On behalf of the BWDB, the Mayor's Office of Employment looks forward to working with ABC Company in providing training services to our customers.

Sincerely,

Jason Perkins-Cohen
Director

Cc: Career Center Network General Manager
Contracting General Manager
ITA Contract Specialist

Attachment 10

December 12, 200X

X
X
X
X

Dear Mr./Ms.:

The Mayor's Office of Employment Development (MOED) has reviewed the course offerings submitted by Global Tech to provide occupational skills training under the Federally funded Workforce Innovation Opportunity Act (WIOA) Individual Training Account (ITA) initiative.

MOED is dependent upon Federal funding to support its operations and at this time funds are . Due to the lack of available funds MOED has made the decision not to accept the course offerings that you have proposed.

If you need further clarification or would to appeal this decision, you must submit a written rebuttal within thirty (30) days to Mr. Richard Chambers, Contracts Manager for the Mayor's Office of Employment Development, 417 E. Fayette Street, Suite 468, Baltimore, Maryland 21202.

On behalf of the BWDB and the Mayor's Office of Employment Development we appreciate your proposal, and wish you continued success with future endeavors.

Sincerely.

Jason Perkins-Cohen
Director

Cc: Career Center Network General Manager
ITA Contract Specialist

Attachment 11

Welcome to Individual Training Accounts (ITA)!

Congratulations – Your ITA Application has been approved! You are now on your way to training and the career of your choice. We will make the arrangements so you can attend the school you selected. You have been approved for the following:

_____	_____
Training Provider	Type of Training
_____	_____
Estimated Start Date	Estimated Completion Date

During your training it is necessary for you to keep in touch with us. We want to know how you are progressing. If we can assist you in order to insure you successfully complete your training and obtain employment, give us a call. If your address or phone number changes, please let us know as soon as possible.

Starting Your Training:

MOED will make every effort for you to start your courses based on the estimated start date listed above. If you do not start as arranged, your funding may be reallocated unless:

- The School changed your start date
- You were ill or in accident
- Family death

Once you start your training we ask that you provide us with the following:

Attendance Forms:

You must complete and submit written attendance forms to your Career Development Facilitator (CDF) monthly while in training. If your training is less than one month (30 days), you must submit written attendance forms weekly to your CDF. The attendance form will be provided to you. You can fax this form or bring this form to the office, but we must receive this form as stated above.

Progress Reports:

We want to know how well you are doing in training. When you receive a progress report, report card or certificate as you complete segments of your training, you must provide us with a copy of these forms. If you are having difficulties, let us know. Our Career Center Staff and Resource Laboratories are at your disposal.

Notification of Completion:

Upon completion of your training, you must submit a copy of your certificate of completion to your CDF within two (2) weeks of completing your course. If you receive a license or certifications, a copy must be submitted to your CDF within two (2) weeks of receipt.

Exit Interview:

You must schedule a meeting with your CDF within two (2) days of completing your training. We will assist you in your job search by developing a sixty days (60) job search plan to help you meet your employment goal.

Employment Information:

The ultimate goal of your training was to prepare you for the career or job of your choice. Once you obtain employment, you must provide the following information to your CDF:

- Employer's Name, Address, Zip Code, Phone Number an E-mail Address (if available)
- Job Title, Start Date, Work Hours, Contact Person, Wage, and Benefits (if available)
- Is your job training related?

Now it is up to you to complete your training and get that job! You are well on your way to a rewarding career! If you believe you can, you will. If you have any questions or need help, it will be our pleasure to assist you at the center with whom you begin your journey. Your Baltimore City One-Stop Career Center Network representative is listed below:

Baltimore City One-Stop Career Center Network

Career Center	**Phone number**
Eastside	410-396-9030
Employment Connection Center	410-396-1052
ReC at Northwest	410-396-7873

Your Career Center Network Representative is: _____

at _____.

Good Luck!

I have reviewed, understood and agreed with what is required of me within the ***Welcome to Individual Training Accounts Packet***.

Name: _____ Date: _____

For Office Use Only

- Original copy is to be kept in the customer's file.

Revised 5.2016

Attachment 12

Name:	**For Month of:**
School:	**Social Security # (last 4 digits)**
Training Course:	
Start Date:	**Est. Completion Date:**

Course #	Hours & Days Per Week	Instructor's Name

Week 1	Course #	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Instructor's Initials
		Date:	Date:	Date:	Date:	Date:	Date:	

Week 2	Course #	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Instructor's Initials
		Date:	Date:	Date:	Date:	Date:	Date:	

Week 3	Course #	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Instructor's Initials
		Date:	Date:	Date:	Date:	Date:	Date:	

Week 4	Course #	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Instructor's Initials
		Date:	Date:	Date:	Date:	Date:	Date:	

Week 5	Course #	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Instructor's Initials
		Date:	Date:	Date:	Date:	Date:	Date:	

Attachment 13

Request for New Vendor
or Course for ITA

Requested submitted by: _____

Career Center: _____ Contact Phone Number:_____

Staff: _____ Date of Submission: _____

Request submitted on behalf of: _____
(insert the customer's name requesting the course, or the name of the provider requesting submission on MHEC list)

❑ Request both **Provider and Course** be added to the MHEC list
❑ Request **Course** be added to the MHEC list

Name of School: _____

Contact Person and Title: _____

Address: _____

City, State, Zip: _____

Phone Number: _____ Alternate Number: _____

List all courses to be considered: _____

Contracting Use:

Date Introductory Letter and State Questionnaire sent to School: _____

Date Letter, Pre-Award Survey, and copy of application process sent: _____

Date Pre-award survey returned from school to contracting representative: _____

Date contracting rep completes a site visit
and completes the *Site Visit Checklist:* _____
Date letter sent from contracting unit if more information is required to process request: _____

Date forwarded by contracting rep to BWDB Liaison: _____

BWDB recommendation: ❑ Yes ❑ No Disposition date: _____

Date letter sent to MHEC requesting the vendor/ course be added to the approved list: _____

Date of Notification to Career Center staff that vendor/ course has been approved: _____

Attachment 14

ITA Customer Application Summary and Checklist

TITLE_____

Date:	☐ **ESCC** ☐ **REC /NWCC** ☐ **Employment Connections** ☐ **Other:_____**	**CDF:**
Customer:		**SS#:**
Vendor **Code:**	**Course** **Code:**	**MOED Cost Reimbursement:**
Tentative Start Date:	**Tentative End Date:**	**Course:** ☐ **College Credit** ☐ **Non-Credit/ Certificate**
Tentative Start Date:	**Tentative End Date:**	

Did the customer apply for: ☐ **Pell Grant** ☐ **Student Loan** ☐ **Scholarship**
☐ **Other: _____** ☐ **Not Applicable**

Training Provider Information	☐ **MHEC Listing** ☐ **Class Schedule** ☐ **Description/ Cost** ☐ **Acceptance Letter** ☐ **Documentation of Cost Difference (Including Budget and Payment Plan Worksheet)**
Financial Verification	☐ **Pell Approval** ☐ **Financial Statement from Vendor** ☐ **Notarized Statement**

Verified eligible for funding: ☐ **WIOA Adult** ☐ **WIOA Dislocated Worker** ☐ **JDNEG**
☐ **Other: _____**

COMMENTS

Budget Review ☐ Approved _____ Date: _____
☐ Not Approved _____ Date: _____

Reviewed by Supervisor: **Date:**

Reviewed by Program Manager: **Date:**

Compiled by Contracting: **Date:**

To be completed by Contract Specialist:

Information complete: ❑ Yes ❑ No – Returned to Center on _____ (date)

Fundware obligation number:_____ **Date Task Order/ LOA issued**: _____

Funding for Training: ❑ WIOA Adult ❑ WIOA Dislocated Worker
❑ Other: _____ (Budget Account Number)

January 5, 2010 Obligation #:

XXXXX
School Name
School Address
Baltimore, Maryland 21202

Dear Mrs. Sass:

This letter is authorization for the following customer to receive A+ PC/ Network Training at a cost not to exceed $

Student Name: Social Security #:
Training Type: Training Cost: $
Start Date:

Attached is the Task Order (Exhibit 1 of the Vendor Agreement). The Task Order is used to activate the Agreement on a per customer basis. Please review the document carefully, and complete both copies as follows:

1. Training Course/Class data
2. Itemized cost of training section (each course)
3. Reporting Requirements section
4. Days of Week section and the hours (time) of each session
5. Total hours of training section
6. Start and end dates of training
7. PELL Grant section

When the customer has started class, sign two copies of the Task Order and return both copies to me for signature. The Task Order is to reflect the actual start date of training, and must be returned within ten business days after the start of training. An attendance sheet signed by the customer must be attached. I will sign and return one copy of the Task Order to you for your files. Invoices are to be submitted no later than thirty (30) days after start of training.

If the customer does not enroll on the approved start date, please refer the customer to his/her respective Career Development Facilitator (CDF) and notify me via e-mail (dvandyke@oedworks.com).

Should you allow the customer to begin training prior to approval or after the approved start date, the Mayor's Office of Employment Development accepts no responsibility for any costs incurred, and you will be liable for all costs associated with the customer's training.

Please call me at (410) 396-7336 if you have any questions.

Sincerely,

Contract Specialist

TASK ORDER **Attachment 16**

Vendor #:	**Account:**

Name of Training Institution: Baltimore City Community College
Address of Training Institution: - 710 E. Lombard Street-Baltimore, Maryland 21202
Contact: Ida Sass
Phone Number: 410-986-3213

PARTICIPANT:	**S.S.#:**	**OB#**
CAREER CENTER: **TELEPHONE #:**	**CDF Initials:**	

TRAINING COURSE	COST PER COURSE	NO. OF DAYS/WK	NO. OF HRS/DAY	NO./ WKS	TOTAL HOURS OF TRAINING	ACTUAL START DATE	END DATE

ITEMIZED COSTS OF TRAINING	
Total Tuition:	
Fees (Registration, Laboratory, Comprehensive, etc.):	
Books/Supplies:	
Uniforms:	
Other:	
TOTAL COST OF TRAINING:	
PELL/Financial Aid Grant Amount (Specify):	( )
TOTAL COST OF COURSE AFTER ALL DEDUCTIONS	

REPORTING REQUIREMENTS: The training institution will issue the following periodic and final reports on standing: grade achievement, competency achievement, and performance appraisal on the dates indicated. Mail Reports to:

SIGNATORY AUTHORITY: The undersigned agree to the terms of This Agreement and commit their respective organizations to compliance with them.

VENDOR: (NAME TYPED)	**MAYOR'S OFFICE OF EMPLOYMENT DEVELOPMENT CONTRACTOR:**
AUTHORIZED SIGNATURE/DATE	**AUTHORIZED SIGNATURE/DATE**
TITLE	**TITLE:**

EXHIBIT IX

PELL CERTIFICATION FORM

As the authorized agent for _(Name of School)____, I certify that the following MHEC approved courses available to MOED participants enrolled in training under this agreement do not qualify within the standards of Pell funding. Therefore, (Name of Participant) cannot receive PELL Grants to off-set cost of this training. The specific training

Courses include:

The [Baltimore City] Mayor's Office of Employment Development's (MOED) Subrecipient Monitoring Guide

Contents: Page

Subrecipient Monitoring Policy..... 2

The Monitoring Process..... 5

Preparing for the Monitoring Visit..... 5

Conducting the Monitoring Visit..... 5

Summarizing the Results of the Monitoring Visit and Communicating to the Parties: MOED Management & the Subrecipient..... 7

Appendix:

Subrecipient Monitoring Checklist x

Participant Folder Review Checklist - WIA Adult Services x

Participant Folder Review Checklist - WIA Youth Services x

Training Program Checklist - WIA Customized and OJT Training x

Participant Folder Review Checklist - Non-WIA Youth Services x

Performance Review of Measurable Stats: Goals versus Actual x

DRAFT

Subrecipient Monitoring Policy

Effective Date: April 1, 2014
Revision Date: March 11, 2014
PDF Version: Subrecipient Monitoring Policy
Approved by: Karen L. Sitnick, Director

Policy Statement

MOED is responsible for monitoring the programmatic and financial activities of its subrecipients in order to ensure proper stewardship of Workforce Innovation and Act (WIOA) or other grantor funds. This policy addresses MOED's responsibilities and assists applicable departments and staff, agency-wide, to ensure that, in addition to achieving performance goals, subrecipients comply with Federal laws and regulations and with the provisions of any agreements that govern the subaward.

Reason for Policy

OMB Circular A-110 and OMB Circular A-133, along with 29 CFR 97.20 and 29 CFR 97.40, require primary recipients of federal funds to monitor subawards and to ensure subrecipients meet the audit requirements in OMB Circular A-133 and use funds in accordance with applicable laws, regulations and terms of the award. This Subrecipient Monitoring Policy applies to all subawards issued under primary funding awards made to the Baltimore City Mayor's Office of Employment Development (MOED), without regard to the primary source of funding.

Who Must Comply

All MOED employees must comply with this policy.

Roles and Responsibilities

As a direct or indirect recipient of federal funds that expends $500,000 or more per fiscal year, MOED must ensure that its subrecipients comply with OMB Circular A-133. MOED's responsibilities include, but are not limited to:

- Informing the subrecipient of all applicable federal laws and regulations and all appropriate flow-down provisions from the prime agreement
- Reviewing the subrecipients' A-133 audit results (ex. via copies of audit reports or via the Federal Audit Clearinghouse (http://harvester.census.gov/sac/)
- Reviewing any actual or planned corrective actions cited by subrecipients in response to reported audit findings, where the audit findings are related to MOED's awards to the subrecipients

- Issuing a management decision on subrecipient's audit findings within six months after receipt of the audit results and ensuring the subrecipient takes appropriate and timely corrective action

Subrecipient monitoring responsibilities are shared among the following:

The MOED Contracting & Compliance Unit and applicable MOED Workforce Services delivery units share the responsibility of monitoring the subrecipients' progress in delivering services in compliance with Federal and other applicable regulations and the terms and conditions of their subrecipient award agreement with MOED, reviewing subrecipient invoices, identifying and following up on questionable expenditures, if necessary, and maintaining documentation of monitoring efforts, developing monitoring plans, and reviewing the results of subrecipient findings, corrective action plans, and other issues brought to their attention.

Procedures

MOED, inclusive of the Contracting & Compliance Unit and the Workforce Services Units, should use the following subrecipient monitoring procedures when appropriate:

1. Review technical reports, performance progress reports or other specified deliverables on a timely basis. Any unforeseen and/or problematic issues should be documented, investigated and effectively resolved.

2. Perform an expense to budget comparison for cost-reimbursement sub-agreements. The subrecipient's invoices must show both current period and cumulative expenses against budget.

3. Review invoices regularly and document the results of the reviews in the applicable files. Such documentation may include, for example: reviewer's initials or authorizing signature on invoices, email communications, notes of applicable meetings with those within and outside of MOED, etc.

4. Request the subrecipient to provide clarification of invoiced charges that appear unusual, excessive, or otherwise questionable. If the sub-award terms permit, MOED may request detailed justification to verify the allowability of the cost. Examples of detailed justifications include:
   - Payroll records
   - Copies of paid invoices showing item cost and Vendor Justification forms if required
   - Descriptions of services rendered by consultants including hourly rates and time reports
   - Details of incurred travel charges stating the purpose of the travel
   - Records identifying any unallowable costs

5. Subrecipients not subject to Circular A-133 may require additional monitoring to ensure compliance, including requesting audited financial statements and/or completion of a financial controls questionnaire by the subrecipient.

6. MOED should establish additional channels of communication and monitoring methods for subrecipients deemed to require closer scrutiny in light of considerations, including, but not limited to:

    - MOED's current and prior experience with the subrecipient
    - The amount of supporting documentation required to be submitted with invoices and programmatic progress reports
    - The complexity of the award, sensitivity of the work and/or scope of governing regulations
    - The level of competency of the subrecipient's administrative and/or program services team and its financial systems
    - The A-133 audit results

7. In addition to earlier noted compliance review procedures, MOED will conduct at least one (1) on-site monitoring visit per year to further assist in evaluating compliance with applicable regulations and the terms and conditions of the subrecipient agreement, and the appropriateness of the subrecipient's administrative systems, programmatic operational processes and procedures and expense charges. Factors to be considered in deciding the frequent of on-site monitoring visits, include, but are not limited to the relative term and monetary value of a subrecipient award, the amount of documentation required to be submitted with invoices, along with other risk factors some of which are covered in #6, above, in deciding whether to conduct on-site visits, and the frequency of such visits. A written monitoring plan should be prepared in advance of on-site visits and used as a tool for managing and/guiding activities to be undertaken during the visit. Monitoring reports should be issued to the subrecipient within fourteen (14) business days from the completion of the visit.

8. Program specific audits of subrecipients may be requested on a discretionary basis in order to resolve questionable costs or other noncompliance issues.

****

The Monitoring Process:

We view the monitoring process as an effective tool in ensuring that subrecipients, as well as MOED, complete their agreed upon tasks and responsibilities in a timely and professional manner as outlined in their written agreement.

A formal (written) schedule should be developed at the start of each fiscal year. The schedule should identify the most probable subrecipients for the period and be flexible enough to incorporate any new subrecipients that are identified later in the year. The requirement, as outlined in the Monitoring Policy on page one (1), is to conduct at least one on-site monitoring visit for each subrecipient. A related goal (but not a requirement) is to complete each visit within six (6) months of the start of services being provided under the agreement.

To help ensure that the proper elements of each sub-contracted program are being examined (monitored) standardized Monitoring Checklists (or similarly titled documents) have been developed for use by the monitors (see Appendix). The checklists help promote relevant, thorough, consistent, organized and efficient monitoring activities. The checklists and associated notes sections should greatly assist in writing up the results of the monitoring visit in the resulting monitoring letter.

Preparing for the Monitoring Visit:

We should ensure that the assigned monitoring staff members are adequately trained to conduct subrecipient monitoring activities. We anticipate that contracting or fiscal unit staff will conduct the fiscal related monitoring activities while program staff will conduct the programmatic related monitoring activities. In some instances, consideration should be given to use a “team” approach to on-site monitoring assignments to more efficiently and thoroughly complete a comprehensive monitoring assignment. These staffing decisions should be made early in the fiscal year during the monitoring plan and schedule development process.

In preparing for each monitoring visit, the assigned monitor(s) should thoroughly review the following (where applicable):

- the Board of Estimates (BOE) approved agreement between MOED and the subrecipient
- processed invoices, including any related correspondence
- performance/progress reports, including any related correspondence
- documentation from the most recent monitoring visit, including follow-up correspondence
- copies of the most recent A-133 audit report or other independent auditor’s report if A-133 is not applicable

Conducting the Monitoring Visit:

There are at least six (6) key elements of a monitoring visit:

- Developing a written plan to guide the monitoring visit
- Notifying the subrecipient of the planned visit
- An entrance conference
- Reviews, conversations, documentation acquisition and analysis
- An exit conference
- Follow-up monitoring letter

It is recommended that we begin the monitoring process by constructing a written plan that identifies at least the following: the purpose of the monitoring visit; the target time-frame (beginning and ending dates); what specifically we intend to look at and what are we looking for; who we wish to speak with; what tools do we intend to use; who, from MOED, will be visiting and who will serve as the lead; what should be done if the MOED team encounters significant obstacles during the visit. The written plan should be reviewed and approved by an appropriate MOED manager.

The next step of the monitoring process calls for contacting the subrecipient by telephone to explain that we would like to visit their location(s) to review on-going operations and records related to the program that we are funding. The goal is to agree upon a date and time for the visit and to outline the intended scope of our review, including staff and participants that we would like to speak with and records and documents that we would like to see. We should also give the subrecipient and estimate of the amount of time we will be spending with them as well as any specific accommodations that we might need (ex. office space, copier access, etc.). We should follow this conversation up with a formal letter that confirms all that has been discussed and agreed-upon.

The entrance conference represents a front-end, sit-down session, with the appropriate staff of the subrecipient just before the monitoring activities actually begin. It's an opportunity to make certain everyone is clear on: the purpose of the visit; what we expect to be able to review; who we expect to be able to speak with; and, the time-frame that we need to complete our on-site review.

It is extremely important that we use the checklists and other guides that were developed to efficiently and effectively lead us through the monitoring visit. We should not leave MOED's offices without these tools when journeying to a subrecipient's location for a monitoring visit. We should systematically follow the checklist elements and clearly record the steps we followed, the information we reviewed/received and the relevant portions of conversations we had with staff. Where possible, these notes should be made directly on the checklist document. We cannot over-emphasize the need to record our notes as we go versus trying to rely on our memories hours and/or days later. We should find this information helpful in developing conclusions from the monitoring visit and sharing the basis for those conclusions.

At the end of the monitoring visit, the reviewer(s) should again meet with key members of the subrecipients staff to share the results of the visit, including any areas of concern and preliminary conclusions drawn from the visit. It's a great opportunity for the subrecipient to: offer any clarifying facts; provide additional documents to support their position/s; and to report any changes that they have already taken to correct deficiencies and/or concerns that we have noted. Careful and detailed notes should be taken of the items discussed during the exit conference, including areas of agreement and disagreement.

Following every monitoring visit, and in a timely fashion, we should provide the subrecipient with a follow-up letter (not an email or phone call) that thanks them for their assistance and cooperation and clearly communicates any particularly good practices and/or deficiencies (findings or concerns) that we identified during our visit. A “finding” is being defined as an item/action that is in violation of the terms and conditions of the agreement, particularly if it violates applicable funding laws and regulations. A “concern” is being defined as a potential weakness in the subrecipient’s operations that if not corrected could result in a future “finding”.

For each finding identified in the letter, we must clearly specify the corrective actions that must be taken by the subrecipient and the related time-frames. For each concern we must offer recommendations for effectively eliminating these issues from future operations. The monitoring letter should request a written response from the subrecipient within a reasonable period of time (ex. within thirty days from the date of the monitoring letter) and require that all findings, concerns and related corrective actions be addressed in their response.

I

EQUAL OPPORTUNITY COMPLAINT, MEDIATION and GRIEVANCE PROCEDURES

FOR

PROGRAM

PARTICIPANTS/EMPLOYEES/SUB-RECIPIENTS

MAYOR'S OFFICE OF EMPLOYMENT DEVELOPMENT

Rev/4/14

MAYOR'S OFFICE OF EMPLOYMENT DEVELOPMENT

GRIEVANCE POLICY AND PROCEDURE

I. PHILOSOPHY

This grievance procedure is concerned with the protection of the rights, privileges and prerogative of the program and participants, employees, subrecipient's or other interested persons for the purpose of receiving and resolving complaints raised in connection with programs operated by the Mayor's Office of Employment Development (MOED), and its subrecipient's. The MOED has established procedures for resolving disagreements among the parties to any compliant which allege a violation of the Workforce Investment Act of 1998, the regulations under the Act or the terms of a grant, subgrant or program operated under the act. It is the intent of this policy and procedure to afford customers a voice in those matters that have a potential adverse, unjust or inequitable effect on their employment conditions. Such issues many be honest differences of opinion, or judgement situations, but the Agency acknowledges the importance of their expression.

It is the responsibility of the Mayor's Office of Employment Development to determine the goals of each of its components, set standards of services, and exercise control and direction over its organization. This responsibility is derived from federal and state regulations, and local direction is provided by the Mayor's Office, the Workforce Investment Board and established City of Baltimore administrative policies and procedures. Nothing contained in this policy is deemed to deny the right of any participant to submit a grievance for prompt disposition.

Participants who seek resolution of complaints or service situations by using established procedures are assured that they will not be subjected to discrimination or retaliation, or be penalized in any way for their use of these procedures.

II. DEFFINITIONS

For the purpose of clarity and understanding, the following definitions will apply throughout this document.

A) "GRIEVANCE OFFICER" is appointed by the Director and is responsible for overseeing adherence to the procedure in a timely manner by all related parties.

B) "HEARING OFFICER" is an objective person appointed by the Director from within or outside the agency.

C) "MEDIATION POLICY" is an alternative dispute resolution that resolves allegations of discrimination at the informal stage of the complaint process.

D) "MOED" means Mayor's Office of Employment Development

E) "WIA" means the Workforce Investment Act

F) "DLLR" means the State of Maryland's Department of Labor, Licensing and Regulation

G) "Participant" means a person enrolled in a program funded through MOED

H) "Subrecipient" means any person, organization, or entity which received funds through MOED

I) "EOO" means MOED's Equal Opportunity Officer

J) "Immediate Supervisor" means any instructor for training participants or the actual agency or worksite supervisor for work-related participants

K) "Department Head" means the Director or Manager of the training program for complainant/grievant enrolled as a training participant. If the grievant/complaint is enrolled as a work-related program participant/MOED employee, "Department Head" shall mean the next level of agency or worksite supervision above that of the immediate supervisor

L) "Filing a Complaint" means the act of writing down the complaint and presenting it to the MOED or its subrecipient's in accordance with this procedure

M) "Secretary" means the Secretary of the United States' Department of Labor

N) "Complainant" means the person(s) or organization(s) filing a complaint of alleged discrimination or for whom the complaint is filed

O) "Respondent" means the individual, program or activity against whom a complaint is filed

P) "DHR" means the State of Maryland's Department of Human Resources

III. TYPES OF COMPLAINTS

A) **Discrimination**: Complaints alleging discrimination on the basis of race, color, national origin, sex, age, religion, marital status, political affiliation or belief, sexual orientation, disability, and for beneficiaries only, citizenship or participation in programs funded by the MOED in admission or access to, opportunity or treatment in, or employment in the administration of or in conjunction with, any MOED funded program or activity, may file a complaint within one hundred eighty (180) days from the date of the alleged violation with the MOED's Equal Opportunity Officer.

If such a complaint is received by the MOED, it will immediately notify DLLR and the Directorate of Civil Rights, Washington, D.C., of the existence and nature of the complaint using the notification of receipt of complaint alleging discrimination form. The individual may file a complaint directly with the Directorate of Civil Rights (DCR), U.S. Department of Labor, 200 Constitution Avenue, NW, Room N-4123, Washington, DC 20210. If the individual elects to file his/her complaint with the MOED, the individual must wait until the MOED issues a decision or until ninety (90) days have passed, whichever is sooner, before filing with DCR. If the MOED has not provided the individual with a written decision within ninety (90) days of the filing of the complaint, the individual need not wait for a decision to be issued, but may file a complaint with DCR within thirty (30) days of the expiration of the ninety (90)-day period. If the individual is dissatisfied with the MOED's resolution of the complaint, the individual may file a complaint with DCR. Such complaint must be filed within thirty (30) days of the date the individual received notice of the MOED's proposed resolution.

B) **Violations Not Involving Discrimination**: Persons with this type of complaint must exhaust this grievance procedure and may request a DLLR review by filing a request with DLLR with ten (10) days from receipt of the MOED decision resulting from the hearing of the complaint. Complaints must be filed within one (1) year of the event(s) on which the complaint is based except in the case of complaints alleging fraud or criminal activity. DLLR will render a decision on the MOED's written decision within ninety (90) days of the original complaint date.

C) **Temporary Assistance to Needy Families (TANF):** Complaints by regular customers or their representatives that allege any violation of 251.3 (Displacement of the Jobs) regulations have the opportunity for an informal resolution of the complaint. If not resolved informally, a hearing will be held in accordance with this grievance procedure. The procedure must take no longer than sixty (60) days from the date of filing to be exhausted which includes time spent informally attempting to resolve the complaint. The complainant has the right to have the decision reviewed by DHR. The complaint must be filed within one (1) year of the alleged occurrence.

D) **Fraud, Abuse, or Other Criminal Activity**: Persons with this type of complaint will be referred to the Secretary.

IV. SCOPE OF PROCEDURES

These procedures cover complaints that allege a violation of the Workforce Investment Act of 1998, the regulations under the Act or the terms of a grant, subgrant or program operated under the Act. Therefore, matters which can not be grieved include but are not limited to:

A) Determination of the mission of an agency, and the standard of service to be offered to the public.
B) Exercise of direction and control over an agency's organization and operation.
C) Examination and qualification of employees and applicants for employment.
D) Establishment or alteration of wages, hours, or leave benefits.
E) Established personnel policies and procedures concerning promotions, classifications, discharges, lay-offs, and suspensions.

Employers, including private-for-profit employers of participants under the Act, are required to have a Grievance Procedure as a condition of participating in programs for the training or hiring of participants under the Act. Employers may operate their own complaint system or may utilize the complaint system established by the Mayor's Office of Employment Development. Employers must inform participants and their employees of the complaint procedure they are to follow when the participant/employee begin employment.

An employer's complaint system shall provide for, upon request by the complainant, a review of an employer's decision by the MOED and the state if necessary, in accordance with the regulations.

V. MATTERS WHICH CAN NOT BE GRIEVED

All matters which by law are vested in the Board of Estimates, the Civil Service Commission, or a City agency can not be the subject of a grievance. These include but are not limited to:

A) Determination of the mission of an agency, and the standard of service to be offered to the public
B) Exercise of direction and control over the agency's organization and operation.
C) The right to hire, promote, transfer, assign, or retain employees in positions within an agency

D) The supervisor's appraisal of an individual's performance
E) The right to suspend, demote, discharge, or take other appropriate disciplinary action against an employee for just cause
F) Establishment or alternative of wages, hours or leave benefits
G) Examination and qualification of employees and applicants for employment
H) Right to determine classifications
I) EEO complaints which are covered under EEO procedures
J) Any Personnel action taken during the initial probationary period

Management has the right to establish policies related to these issues. Employees can grieve the specific applications of these policies only if they can document that the application of the policy was not congruent with established procedure.

The determination that a grievance is related to a specific application of a policy is at management's discretion.

VI. COMPLAINT PROCESSING PROCEDURE

General Requirements

Each State and each Local Workforce Investment Area (LWIA) is required to adopt and publish procedures for processing complaints alleging discrimination against any program or activity funded or authorized under WIA title I. The procedures must provide the complainant with the option to file with the MOED or directly with the Civil Rights Center (CRC). The MOED as well as service providers must comply with the complaint procedures.

The requirements for the MOED's discrimination complaint processing procedures are grouped under the following five general categories:

A) Jurisdiction
B) Methods of Resolution/Disposition
C) Notice of Final Action
D) Processing Timeframes
E) Recordkeeping

1. Jurisdiction

Filing A Complaint

A) Any person who believes that either he or she, or any specific class of individuals, has been or is being subjected to discrimination prohibited under WIA will be given the option to file a written complaint, either by him/herself or through a representative. Examples of who may file a complaint include the following:

- Applicants/registrants for aid, benefits, services or training
- Eligible applicants/registrants

- Participants
- Employees
- Applicants for employment/customers
- Service providers (the organization involved is one which may be attributed a racial, national origin, or other characteristic entitled to protection under WIA)
- Eligible service providers (same definition applies)

B) The complainant must be given the option to file a complaint with either the MOED, through the EO Officer or the Director (of CRC). Complaints filled with the director should be sent to:

The Director
Civil Rights Center (CRC)
U.S. Department of Labor
200 Constitution Avenue, N.W.
Room N-4123
Washington, D.C. 21210

C) Complaints must be filed within 180 days of the alleged discrimination. Only the Director, CRC may extend the filing time for good cause shown by the complainant.

D) Each complaint must be filed in writing, and must contain the following information:

i) The complainant's name and address (or other means of contacting the complainant);

ii) The identity of the respondent (the individual or entity that the complainant alleges is responsible for the discrimination);

iii) A description of the complainant's allegations. This description must include enough detail to allow the Director or the MOED, as applicable, to decide whether:

a) CRC or the MOED, as applicable, has jurisdiction over the complaint;
b) The complaint was filed in time; and
c) The complaint has apparent merit; in other words, whether the complainant's allegations, if true, would violate any of the nondiscrimination and equal opportunity provisions of WIA.

iv) The complainant's signature or the signature of the complainant's authorized representative.

E) A complainant may file a complaint by completing and submitting CRC's Complaint Information and Privacy Act Consensus Forms (currently under revision at CRC).

F) Both the complainant and the respondent have the right to be represented by an attorney or other individual of their choice.

G) If the MOED determines that it does not have jurisdiction over a complaint, it must notify the complainant, in writing, immediately. This Notice of Lack of Jurisdiction must include:

- A statement of the reasons for that determinations
- Notice that the complainant has a right to file a complaint with CRC within 30 days of the date on which the complainant receives the Notice.

2. **Methods of Resolution/Disposition of Complaints**

Required Elements of the MOED's Discrimination Complaint Processing Procedures

At a minimum, the procedures that the MOED adopts and publishes will include the following elements:

A) Initial written notice to the complainant that contains the following information:

- An acknowledgement that the MOED has received the complaint, and
- Notice that the complaint has the right to be represented in the complaint process;

B) A written statement of the issue(s), provided to the complainant, that includes the following information:

- A list of the issues raised in the complaint, and
- For each issue, a statement whether the MOED will accept the issue for investigation or reject the issue, and the reasons for each rejection;

C) A period for fact-finding or investigation of the circumstances underlying the complaint;

D) A period during which the MOED attempts to resolve the complaint. The methods available to resolve the complaint must include alternative dispute resolution (ADR). A mediation will take place, and the grievance office officers will be the following individuals:

Valarie McNeese
Director of Human Resources
417 E. Fayette Street, Suite 466
Baltimore, MD 21202
(410) 396-1790

Malcolm Leggett
MOED Assistant Director
417 E. Fayette Street, Suite 466
Baltimore, MD 21202
(410) 396-1790

E) The MOED's ADR procedures must provide that :

i) The choice whether to use ADR or the customary process rests with the complainant:
ii) A party to any agreement reached under ADR may file a complaint within the Director in the event the agreement is breached. In such circumstances, the following rules apply:

(a) The non-breaching party may file a complaint with the Director within 30 days of the date on which the non-breaching party learns of the alleged breach;
(b) The Director must evaluate the circumstances to determine whether the agreement has been breached. If he or she determines that the agreement has been breached, the company may file a complaint with CRC based upon his/her original allegation(s), and the Director will waive the time deadlines for filing such a complaint
(c) If the parties do not reach an agreement under ADR, the complainant may file a complaint with the Director as described under **Jurisdiction.**

3. **Notice of Final Action**

The procedures that the MOED adopts and publishes must provide that the MOED will receive a written Notice of Final Action on discrimination complaints within 90 days of the date on which the complaint is filed. The Notice of Final Action must contain the following information:

A) For each issue raised in the complaint, a statement of either;

- The MOED's decision on the issue and an explanation of the reasons underlying the decision, or
- A description of the way the parties resolved the issue

B) Notice that the complainant has a right to file a complaint with CRC within 30 days of the date on which the Notice of Final Action is issued if he or she is dissatisfied with the MOED's final action on the complaint.

4. **Processing Timeframes**

A) Within 90 days of the date on which a complaint is filed, the MOED must take one of the following actions:

- Issue satisfactory written Notice of Final Action
- Issue unsatisfactory written Notice of Final Action Decision
- Issue written notice of lack of jurisdiction
- Refer complaint to another Federal Grantmaking Agency for investigation where there is joint jurisdiction

B) If, by the end of 90 days from the date on which the complainant filled the complaint, the MOED fails to issue a Notice of Final Action, the complainant or his/her representative may file a complaint with the Director within 30 days of the expiration of the 90-day period. In other

words, the complaint must be filled with the Director within 120 days of the date on which the complaint was filed with the MOED.

C) The Director may extend the 30-day time limit under the following circumstances:

- If the MOED does not include in its Notice of Final Action the required notice about the complainant's right to file with the Director; or
- For other food cause shown.
- The complainant has the burden of proving to the Director that the time limit should be extended.

5. **Recordkeeping Requirements**

A) The MOED must maintain, and submit to CRC upon request, a log of complaints filed with it that allege discrimination on the ground(s) of race, color, religion, sex, national origin, age, disability, political affiliation or belief, citizenship, and/or participation in a WIA Title I-financially assisted program or activity.

B) The complaint log must include the following information:

- The name and address of the complainant;
- The ground of the complaint;
- A description of the complaint;
- The date the complaint was filed;
- The disposition and date of disposition of the complaint; and
- Other pertinent information

C) Information that could lead to identification of a particular individual as having filed a complaint must be kept confidential.

D) Records regarding complaints and actions taken on the complaints must be maintained for a period of not less then three years from the date of resolution of the complaint.

Voluntary Mediation

I have read the information on the Mayor's Office of Employment Development's Informal Resolution and Mediation Program.

Based on the information provided to me, I have voluntarily and freely made the following election with regard to Mediation:

_____ **Yes**	**I elect to avail myself of the Mediation option of complainant resolution. I agree to participate in the Mediation efforts led b the Office of Equal Opportunity and program Equity and to attempt to settle the issue(s) in dispute between the Respondent and me.**

_____ **NO**	**I elect not to use Mediation as an alternative method of dispute resolution and request that the formal complaint investigation process begin as soon as this form is received in the Office of Equal Opportunity and Program Equity.**

Complainant: _____ Date: _____

Witness: _____ Date: _____

Rev. 10//00

Mayor's Office of Employment Development
417 E. Fayette Street, Suite 430
Baltimore, MD 21202
Telephone: (410) 396-1790; Fax: (410) 396-8132
Website: http://www.oedworks.com

Mayor's Office of Employment Development
Career Center Network

COMPLAINT, MEDIATION and GRIEVANCE PROCEDURE

NAME: _____
(Please print)

S.S.N#**: (Last 4 Digits**)_____

I have reviewed a copy of the MOED COMPLAINT, MEDIATION and GRIEVANCE PROCEDURE. I understand that as a program participant in an MOED program, I must first attempt to resolve any grievances through procedures established by the agency to which I have been assigned. If I am unable to resolve the grievance at this level, or if I am not satisfied with the resolution of the grievance, I understand that I may file a grievance with the MOED Equal Opportunity Offices, following the steps outlined in the COMPLAINT, MEDIATION and GRIEVANCE PROCEDURES.

Customer's Signature: _____ Date: _____

Witness: _____ Date:_____

Mayor's Office of Employment Development
417 E. Fayette Street, Suite 430
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Website: http://www.oedworks.com

Rev April 2014

417 E. Fayette Street
Suite 468
Baltimore, Maryland 21202
Voice 410-396-1910
Fax 410-752-6625
www.baltoworkforce.com

BALTIMORE WORKFORCE INVESTMENT BOARD

CONFLICT OF INTEREST POLICY

- No board member may participate in a matter under consideration by the board regarding the provision of services by the board member or the entity the board member represents.

- No board member may participate in any matter in which the board member, a qualifying relative or a business associated with the board member or qualifying relative, has a direct financial interest.

- A member's employer may not participate in any way in a future bid on procurement where the member helped to draft specifications. In order to avoid potential conflicts as circumstances change, members whose employers may wish to participate in a future procurement will refrain from involvement in specification development.

- No board member may intentionally use the prestige of his or her public position for that board member's private gain or that of another.

- Except in the discharge of an official duty, no board member may disclose or use confidential information acquired by reason of the board member's public position and not available to the public for personal economic benefit or for the economic benefit of another.

- Board members may not use their status in marketing their private businesses.

- Any board member, with a potential or actual conflict of interest, must disclose that fact, in writing to the board chairman as soon as the potential conflict is discovered and, to the extent possible, before the agenda for a meeting involving the matter at issue is prepared. If it should be determined during a meeting that a conflict of interest exists, the board member must verbally declare such conflict of interest, such declaration must be clearly noted in the minutes, and such board member must excuse him/herself from the remainder of the discussion and the voting.

- No board member may solicit or accept any gratuity, gift or item of monetary value from suppliers, contractors or subcontractors of the board. Gifts of nominal value (under $25) are permissible.

- The board shall adopt procedures that serve to minimize the appearance of conflicts. Local board members, who represent One Stop partners and who serve on committees that oversee the One Stop system or the allocation of resources that would potentially be allocated to their programs, refrain from discussing or voting on any matter that would impact the programs they represent.

- The board shall adopt appropriate penalties, sanctions or other disciplinary actions, including termination, on a case by case basis, for board members who violate any portion of this policy.

- Each board member shall annually sign a statement that he or she has reviewed this policy and is aware of his or her responsibilities under it.

DEFINITIONS

"Direct Financial Interest" means ownership of an interest as the result of which the owner has received within the past 3 years, is currently receiving, or in the future is entitled to receive, more than $1,000 per year; or ownership of more than 3% of a business entity; or ownership of securities of any kind that represent, or are convertible into, ownership of more than 3% of a business entity.

"Procurement contract" has the meaning provided in section 11-101 of the State Finance and Procurement Article.

"Qualifying relative" means a spouse, parent, child, brothers, or sister.

ACCEPTANCE STATEMENT

I have read and accept the terms of the Conflict of Interest Policy detailed above.

_____ Signature

_____ Date

_____ Organization

Attachment 5

The Baltimore City Mayor's Office of Employment Development held a public forum to accept comments on August 11, 2016.

Q: Regarding youth service providers and the selection process – how are providers chosen?
A: The board issues an RFP; the BWIB Youth Council reviews proposals and makes recommendations; those the Board approves go through the contracting process, the city procurement process and finally are approved by the City Board of Estimates

Q: How are MOED operations changing under WIOA versus WIA?
A: Can't say exactly right now – the agency is overseen by the board but we're waiting for final WIOA regulations to be released. At the next Board meeting they will discuss how they will operate and how MOED will operate. There will be changes, just don't know what those changes will be yet.

Q: Under WIOA there's no tiered services; how do you plan to provide more training opportunities. With money decreasing, how do you still meet people where they are without sufficient resources?
A: Submit what you think we should do

Q: How much coordination will there be with adult education /ESL? These folks have to be connected with American Job Centers as mandatory partners.
A: Submit what you think we should do/conversations are happening about this though

Q: What's your vision for coordination with sector based training providers like 1B4J on service delivery and working with employers?
A: It's definitely a commitment. Customized training and 1B4J are examples of sector strategies. Again, tell us what's important and why and encourage MOED to incorporate it in the plan and actualize it. MOED understands the importance of sector strategies – question is how do we make it work.

Q: For populations with barriers – do you encourage groups to come together to submit one response to RFPs because so many groups are serving different people?
A: Current RFP's and existing providers are public. Tell us how you think we should do it in the future.

Q: Is city planning to submit an RFP for operators of the one-stop centers?
A: Every city has to competitively bid for a One-Stop Operator/everyone is trying to figure it out based on the preliminary regulations. Still not totally clear- additional guidance is forthcoming but how do you write a plan without the guidance. It is high on the plate of the board; will be discussed at the next board meeting.

Q1: What will community outreach look like and marketing to constituents in the coming years – in past (outreach) was more focused on business partners. I heard community outreach is getting new strategies
A: Again, please tell us your ideas – what do you think and why is it important.

Q2: What will data look like/reporting/presenting findings to the community? Will there by a dashboard on a quarterly basis?

A: Share metrics you think community should know/how often/etc. We're not starting from a blank slate; we collect data and the plan requests data to report on. What the feds require us to report on may not be what community wants though

Q: How are RFP's disseminated - should we check periodically?
A: Yes they are put on the website and in the paper and tell us if you have ideas about new ways to share

Q: Any more community events about the plan?
A: No this is the only meeting

Q: This is the only event?
A: Yes

Q: Can we get the PowerPoint to distribute to partners?
A: Yes - We shared your comments with the MOED team and they were incorporated in the current version but if you meet with your partners, please provide your comments through the email address provided.

Comments received via email:

Respondent 1 –

According to the draft Workforce Plan, "the BWDB envisions a comprehensive system in which public agencies, the nonprofit community and the private sector work in true partnership to create an industry sector strategy that stimulates career pathways for residents to access good jobs and provides a simplified process for employers to find their skilled workforce" (28). In order to more fully realize this objective, Respondent recommends that the Baltimore City Mayor's Office of Employment Development (MOED) create opportunities for workforce intermediaries to work directly with the Business Services Division and employers, in order to ensure that the services provided by MOED most fully benefit jobseekers and facilitate the hiring process.

MOED has developed a city-wide network of One-Stop Career Centers and a series of procedures designed to ensure that qualified residents are able to access job opportunities and to reduce hiring costs for employers. In order to best facilitate the local hiring process, Respondent recommends creating opportunities for workforce intermediaries to utilize this network in partnership with MOED to directly facilitate an equitable and effective system for connecting qualified residents with employment opportunities.

Under the Employ Baltimore Executive Order, any contractor delivering services under a work contract with Baltimore City is required to hold a consultation with a MOED Business Services Representative within two weeks of the contract award and to work with MOED on hiring workers for the contract. Business Services can also support contractors in achieving the required local hiring minimum under Baltimore's 2013 Local Hiring Law – that 51% or more of new workers hired as a result of the contract be Baltimore City residents.

Currently, contractors post these available employment opportunities with MOED, and a Business Services Representative forwards resumes from applicants to these employers. In order to facilitate the local hiring process, MOED collects resumes from jobseekers. Based on feedback from employers within the sectors that Respndent serves as a workforce intermediary, it can be difficult for non-industry professionals to effectively match job applicants with the skills and experience needs of an employer when utilizing this system. In the experience of these employer partners, the resumes that they receive from MOED often do not match their hiring needs. Consequently, maintaining this process under the 2017-2020 Workforce Plan may not reliably lead to interview opportunities for applicants.

Due to this difficulty in connecting with workers who may be a strong fit for open positions, employers value the role of a sector-based workforce intermediary in screening and matching applicants with their job openings. These workforce intermediaries often provide comprehensive employer-driven training, including industry-required certifications, skills, and on-the-job experience. This ensures that job applicants fully meet the hiring needs of employers and that residents who are disconnected from the workforce are able to qualify for family-supporting jobs.

Moreover, a resume is often not the best representation of the skills and experience a workforce training client may have, especially for individuals who were formerly incarcerated or otherwise have gaps in their work history. A resume alone can communicate to employers that an applicant facing barriers to employment is not a good match for their company when in fact, the individual is highly qualified. Opportunities for in-person interaction and dialogue with a trusted workforce intermediary are therefore of extreme importance in connecting individuals with barriers to open employment opportunities. Some Baltimore-based training providers therefore elect not to send their clients to a Business Services Representative, as there is currently little opportunity for the organization's Placement Specialist to interact directly with employers.

Outside of individual programs such as the One Baltimore for Jobs (1B4J) program, the proposed Workforce Plan incorporates little opportunity for a workforce intermediary to play a direct role in the employment development process. This presents a significant challenge to finding a strong fit for jobseekers with barriers to employment in particular, as there is no opportunity for a trusted workforce intermediary to vouch for the qualifications and professionalism of the applicant. Employers who would not traditionally hire an individual with past barriers to employment therefore are unlikely to feel comfortable doing so under the current Workforce Plan, as they will not have access to a trusted third party's recommendation of the applicant's professionalism and qualifications.

Workforce intermediaries are uniquely able to motivate employers with hiring restrictions to expand their hiring pool and hire individuals they may not otherwise have considered a good fit based on certain barriers to employment, such as a criminal record. By providing workers with extensive on-the-job training, workforce intermediary organizations are able to strongly vouch for a job seeker's skills, trustworthiness, and professionalism. The role of a Placement Specialist in particular is valuable in ensuring that employers receive higher quality job applications more tailored to the requirements of the position, directly from a trusted workforce intermediary who has thoroughly vetted the applicant and assessed them to be qualified prior to submitting an application on behalf of their client.

As a result, by leveraging the case management role of workforce intermediaries that work to expand access to employment opportunities for those with barriers to employment, creating a role for a Placement Specialist to facilitate the hiring process would improve results for employers and better assist individuals with barriers to work in obtaining employment.

In order to rigorously evaluate which workforce intermediary organizations in each sector will best serve in this role, Respndent proposes that the Business Services Division administer a competitive application process to select designated workforce intermediaries to facilitate employment within specific industry sectors. Then, MOED would facilitate connections between these workforce intermediaries and employers that are performing work on City contracts. The selected workforce intermediaries will then work directly with employers and the Business Services Division to effectively connect qualified jobseekers to available opportunities in an equitable and non-preferential manner.

As one example of how this model can function effectively in Baltimore, Respondent notes that the Maryland Transit Administration released a competitive Request for Proposals to select "preferred training providers" and workforce intermediaries to work directly with contractors and provide sector-based occupational skills training, in order to fill thousands of construction positions under its contracts to construct the Red Line light rail transit system. State officials at MTA developed an assessment rubric to identify companies and organizations with a "demonstrated track record of success with education and training programs and/or the ability to reach into economically- and socially-disadvantaged communities"[1] within the identified sectors. Organizations then submitted proposals to deliver sector-based training, job-readiness preparation, industry-recognized credentials, wrap-around supports, and placement (hiring facilitation) services for workers entering construction sectors, such as: skilled carpentry, electric, ironwork, plumbing/gas fitting, cement masonry, and others. This RFP process enabled highly experienced local workforce intermediaries to play a direct, expert role in qualifying Baltimore City residents for open positions on the Red Line contract and connecting employers with applicants.

As an additional example a successful partnership between a Workforce Development Board and workforce intermediaries to connect local jobseekers with employers, Seattle's Office of Economic Development in the state of Washington has funded and maintained an ongoing partnership with the Seattle Jobs Initiative's Career Pathways Program, which delivers "linked short-term and longer-term training at area community colleges in four industry sectors: Automotive/Trade/Logistics, Healthcare, Office Occupations/MOP, and Manufacturing" for Seattle's low-income individuals.[2] The program provides supportive services and placement into in local industry sectors, offering "three training/job placement options:1) short-term cohort training in growing industry sectors (currently manufacturing/welding, office occupations, automotive, and construction); 2) a sector pathways program that provides very short-term job- specific training through non-SJI training programs; and 3) an individualized placement program for those seeking immediate employment."[3] Participants are also assisted by Career Navigators, who serve in a case management and placement specialist role.

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[1] Email release of Request for Proposals from Maryland Transit Administration Economic Empowerment Program, Sunday, November 17, 2013.

[2] Seattle Jobs Initiative, "Career Pathways Program" (2016) http://www.seattlejobsinitiative.com/jobseekers/career-pathways-program/ Accessed August 18, 2016.

[3] Urban Partnerships for Welfare Reform, "Strategic Job Placement for Advancement: Seattle Jobs Initiative. https://peerta.acf.hhs.gov/upitoolkit/content/seattle-jobs-initiative Accessed August 16, 2016.

Respondent 2-

General Comments

President Obama's Workforce Innovation and Opportunity Act presents state and local workforce boards with opportunities to develop a workforce system that meets the dynamic and unmet needs of its area's employers and youth and adults who are low-income and/or basic skills deficient..

Many of Baltimore's immigrant and refugee communities will be eligible for priority of service status within the following categories: "low-income individual," individuals who are "basic skills deficient,[9]" recipients of public assistance and individuals with a barrier to employment in categories including but not limited to, individuals who are English Language Learners and individuals facing substantial cultural barriers…that may serve as a hindrance to employment (p. 44-48). More specifically, WIOA includes individuals who are basic skills deficient in the priority of service, specifically described as "…a youth or adult, that is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family or society (p. 45)."

Baltimore City's New American community has nearly doubled in the last decade. As of 2014, more than 46,000 foreign-born call Baltimore home.[10] Approximately 20,000 (3.4% of the city's total population) are Limited English Proficient (LEP). The core languages spoken by these LEP individuals are Spanish (10,450), Chinese (950), French (940), Russian (800), and Korean (770). Additionally, 1,060 individuals speak one of the African languages, and an increasing number (660) speak Arabic.[11] Immigrants, efugees and LEP communities may fall under the category of individuals with barriers to employment, as defined by WIOA and Maryland under the following: Individuals facing substantial cultural barriers and/or Individuals who are English Language Learners.

As noted in the Local Plan, despite Baltimore's many assets, unemployment remains high at a rate of 7.4 percent (p. 3), including a rate of 18.5 percent among Black and African-Americans, 19.4 percent among American Indian and Alaskan Native and 9.7 percent among Hispanic and Latino residents. In Maryland, 44 percent of all Temporary Cash Assistance Recipients reside in Baltimore City (p. 6). Furthermore, 20 percent of the adults within Baltimore City lack a high school diploma (p.4).

MOED and the BWDB are well-versed in the many possible hardships facing Baltimore City residents, particularly adults and youth with barriers to employments, as well as the challenges experienced by adult education and workforce service providers in their efforts to creatively and sustainably contribute to the myriad of necessary solutions.

It is with this frame of reference that Respondent recommends amendments and revisions be made to the current plan that demonstrate the local workforce area's vision and commitment to realizing this

[9] Basic Skills Deficient: a) is a youth, that has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test or b) is a youth or adult, that is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.
[10] U. S. Bureau, 2010-2014 American Community Survey.
[11] All data are taken from the U.S. Census Bureau, 2011-2013 3-Year American Community Survey.

opportunity through the development of a strategic and customer-centered plan, through the inclusion of demographics that demonstrate the needs of Baltimore's foreign-born population and English Language Learners and finally, by the commitment to fund pilot programs to adequately serve individuals with priority of service under WIOA.

Comments on Report

Section 1: Strategic Planning

Section C:

1. Data is included in the plan as to the unemployment rates of people with disabilities, the barriers experienced by people with criminal backgrounds and people who experience homelessness and the educational barriers experienced by youth who have aged out of foster care. Respondent and its partners recommend that additional information be included on underemployment and, unemployment rates and lack of adequate mentoring and networking channels for residents who are English Language Learners, in alignment with the priority of service for individuals who are "basic skills deficient" and possibly face substantial cultural barriers (pp. 12-15).

Section D:

1. In reference to workforce development activities (including education and training), The State of Maryland requests "…an analysis of the strengths and weakness 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 the employers in the Local Area (p. 16)." Respondent would like to see an internal analysis conducted by MOED and BWDB as to the capacity of the listed occupational training providers, beyond BCCC, to serve adults and youth who are Limited English Proficient and have basic skills deficiencies (pp.16-17). The majority of the occupational training providers are ill-equipped to serve English Language Learners and the foreign-born population.

2. Baltimore was an early implementer of I-Best (Integrated Basic Education Skills and Training) and is recognized as such. As career pathways are a primary focus of WIOA, Respondent encourages that this work continues and would like additional information included in the plan as to how I-BEST, pre-apprenticeships and apprenticeships will be offered to Limited English proficient residents by mainstream training providers and incorporated within career pathways (p. 18). To effectively sustain models such as I-Best, Respondent recommends that MOED staff receive extensive and ongoing training on how to effectively provide case management for English Language Learners and market these individuals. The realities of workforce development programs that can effectively meet the needs of this population includes programs that meet with clients one-on-one rather than utilizing English-heavy printed materials and orientations for clients to determine their next steps, develop a training and employment program in extensive coordination with the client and do not require computer literacy to access programs and services.

3. Respondent supports the BWDB in their efforts to perform an environmental scan to map all of Baltimore's workforce training programs and key services. Respondent recommends that the scan

should include all training and employment services, even if not listed on pages 16, 17, 62 or 63, who provide services to individuals with priority of service and those who are "basic skills deficient." Including new partners could inform the identification of assets, gaps and funding and partnership opportunities and ensure BWDB's compliance with the defined priority of service.

This scan should be incorporated into a dashboard for the community to better understand how MOED is adapting and incorporating new partners to meet the barriers experienced by many of Baltimore's residents.

Section D:

1. Respondent and its partners recommend that MOED adjusts it plans and programs for marketing to include outreach to not only business partners, but community residents and groups. Sustained and meaningful outreach is a tool that staff should be trained on and included in work plans if MOED plans to develop a customer-centered workforce development system. As part of MOED's plans to "host forums on new policies and initiatives that reduce employment barriers or increase employment access for city residents (p.21)," an existing track record of outreach and understanding of the community and its needs will facilitate successful implementation of this strategy.

Section 2: Alignment of Local Workforce Development System

Section A:

1. The Youth Council is an innovative and positive initiative by the BWDB (p.32). WIOA and the new local plan represent an excellent opportunity for the BWDB to engage new partners to ensure services are aligned with the needs of the city's population and youth who "have an English reading, writing, or computing skills at or below the 8th grade level on a generally standardized test (p. 45.)" The current list of Youth Council members that could represent the needs of youth who are Limited English Proficient includes only Baltimore City Community College. Respondent recommends BWDB include another group to promote the alignment of youth training and employment services with the needs of youth who are Limited English Proficient and the growing number of DACA (Deferred Action for Childhood Arrivals) students with access to a work authorization permit. Respondent and its partners would like to learn how members are selected and the process for applying to become a member.

2. Title II - Adult Education: Consistent with the goal of service alignment and integration, Respondent recommends MOED and the BWDB engage with Baltimore City Community College and their workforce department to promote the development of career laddering and pathway opportunities for English Language Learners. It is also crucial that MOED and the BWDB facilitate conversations to ensure that on an institutional level, Baltimore City Community College is identifying and developing programs to support the needs of English Language Learners and promote alignment with the local workforce development area to achieve these means (p.22).

Section B:

1. Respondent understands that the BWDB will engage in significant planning efforts to determine how, what and when quality improvements should be made to the workforce system in an effort to "…expand access to employment, training, education and supportive services for eligible individuals, particularly eligible individuals with barriers to employment (p. 26)." Respondent reiterates the importance of the opportunities presented within WIOA for innovation to solve the city's most persistent and pressing problems and encourages additional coordination with the Opportunity Collaborative and other research and technical assistance providers, use of additional performance metrics and dashboards and exploration of demonstration projects, particularly for credentialing that is portable and stackable (p.26).

   Metrics should be included in a dashboard for the community to review MOED's outreach and planning efforts have translated into service delivery, staff development and resource distribution.

   In addition, MOED states that their program is an "open-access system that seeks to serve all Baltimore City residents (p. 26)." It is the experience of Respondent that accessibility to services among the foreign-born population is limited by the requirement that clients be computer literate to access services for jobs that don't require computer literacy, lack of clarity as to the designated staff member to serve clients, how to reach the staff member and next steps and the sequencing of services that may cause confusion and disengagement from services when clients are facing financial hardships and need to receive assurance and ongoing engagement as to how they will be assisted.

Section D:

1. In regards to the requirements that the local area "facilitate engagement of businesses, including small businesses…," Respondent recommends that MOED's Business Services Team include small to medium sized businesses in their engagement strategy as we have learned that companies of this size may be more willing to hire English Language Learners and the foreign-born population. To be able to serve and market this population to businesses, all members of the Business Services Team should be required to attend any special training and should be encouraged to utilize the strategy of consultative selling to develop employment opportunities that meet the community's economic self-sufficiency needs and allow for upgrades (pp. 27-28.)

Section E:

1. Respondent and its partners would like to learn in more detail about how the opportunities of apprenticeships, customized training and on-the-job training will be adapted to be accessible for English Language Learners and the foreign-born population. Based on their experiences, they recommend that specific staff and leaders be tasked with both identifying unique opportunities for these populations and how can existing programs and models be adapted to address accessibility. Specific employers and employment will need to be identified and fostered for the foreign-born and English Language Learners to access these opportunities and this will require specific staffing and training (pp. 29-31).

2. MOED states that they plan to keep ACE and I-BEST in their tool kit of options for students with low basic skills. Based on the definition of priority of service, high numbers of unemployment and lack of occupational skills trainings for clients who are English Language Learners, Respondent and its partners recommend that MOED identify opportunities to fund ACE or other similar programs (p. 31).

Section J:

1. Respondent is in agreement that faith and community-based organizations play a vital role in the local workforce development system. Unfortunately, the current list of community and faith-based organizations does not include the immigrant and refugee community, which represent a majority of residents who are English Language Learners. It is also the experience of Respondent and its partners that for the BWDB and MOED to create a system that promotes alignment and meets the needs of the community, additional training, commitment and resources are needed for MOED staff to conduct effective outreach with the foreign-born community (pp. 33-34).

   A dashboard for presentation to the community should include community outreach metrics and address how groups with priority of service have been engaged, what was the method for engagement and what strategies have resulted from this engagement.

Section 3: American Job Center Delivery System

Adapting the delivery system of the American Job Center to meet the dynamic needs of English Language Learners and the foreign-born population is a challenge for many localities. Some localities, though, are proactively responding to this challenge by supporting the integration of non-profit partners, who have a successful track record of providing workforce development services for immigrants and refugees, into their American Job Centers, such as in Alexandria, Virginia with Catholic Charities, or by providing Title I funding to such entities, including through the Pennsylvania Welcome Center or the Neighborhood Center in Houston, Texas. Respondent recommends that the BWDB and MOED explore and fund such strategies.

Section K:

1. As mentioned previously, priority of service applies to individuals who are "basic skills deficient." This includes individuals who are Limited English Proficient and as such, are eligible for training services. Under WIOA, services should be concurrent and individuals are eligible for training services, even if they are basic skills deficient and have low levels of English. Respondent and its partners would like more specifics about MOED's plan to offer training services that meet the needs of Limited English Proficient individuals, such as through I-Best programs, on the job training, pre-apprenticeships, and customized training (p. 44-48).

Section 4: Title I-Adult, Youth and Dislocated Worker Functions

Section 0:

1. Of the four organizations listed that provide services to youth 16 to 24 years of age, it is unclear whether any of these organizations currently serve or are equipped to serve youth who are English Language Learners. Respondent recommends that the BWDB and MOED include and fund partners who provide culturally and linguistically-appropriate services to this population of youth and also provide additional information on how these organizations are equipped to serve youth who are "basic skills deficient," including in the English language (p. 58).

Section 6: Title II-Adult Education and Family Literacy Functions

Section B:

1. In regards to MOED's efforts to develop a mapping tool, in coordination with Adult Education providers, Respondent recommends that MOED engages immigrant, refugee and LEP-serving faith communities and community based-organization in their planning efforts. It is recommended that MOED develop a mapping tool that allows for "overlay" in regards to the specific populations with priority of service status, as well as the system as a whole and convene coordination regarding career pathways and multiple "on-ramps" and "off-ramps" for English Language Learners and individuals who need a GED and how they can access I-Best trainings, occupational skills trainings and professional relicensing and certification (pp.62-63). The mapping tool should demonstrate how different populations can access these trainings, who the service providers are and if gaps exist in service delivery.

2. Respondent and its partners have engaged in ongoing discussions with MOED staff as to their concerns regarding the use of the TABE test as the sole assessment for clients to be able to access WIOA Individualized Training and Employment Services. For clients who are English Language Learners and may face substantial cultural barriers, the TABE test possesses a challenge to these clients due to the culturally-biased nature of the test. For example, some questions that clients may struggle with include passages regarding movie ratings, pet dogs, Georgia O'Keefe and cocoa beans. Unfortunately, the extensive assistance needed for clients to learn how to take these assessments and even learn about these cultural aspects have prevented clients, including those with Master's degrees and professional backgrounds, from accessing crucial training and employment opportunities. Respondent recommends that MOED continue to coordinate with the State of Maryland, their peer workforce development areas and Baltimore City Community College's leadership and workforce development program to determine what the options and what other localities and states are doing to address this challenge (pp. 65- 66).

   Respondent and its partners would like more information included in Baltimore City's Local Workforce plan as to how they will coordinate with adult education to prevent over-assessment of customers and how the local educational assessment policy in Baltimore City will be adapted based on the customer, targeted industry, curriculum, training and case management sessions. Respondent recommends the BWDB explore how other localities may be using the CASAS assessment, which is less culturally-biased, to inform customers' access to training, while also ensuring that customers are adequately prepared for the training and placement.

Section 8: Temporary Assistance for Needy Families Functions

Section A:

1. The mandated partnership between WIOA partners and the Temporary Assistance Program for Needy Families is very encouraging and Respondent looks forward to its phased implementation. Respondent would like to ensure that local DSS partners and providers are equipped with the training and language access resources required to meet the needs of individuals who are Limited English Proficient. In the coming years, Baltimore City expects to resettle more large families, single mothers and individuals with substantial cultural barriers and limited English proficiency. It has been the experience of Respondent and its partners that many women and individuals who are Limited English Proficient have ongoing challenges with understanding TANF, its requirements and are at risk of losing crucial assistance or miss out on opportunities to advance themselves or their families. Respondent recommends that MOED ensure any technical assistance also includes strategies to serve individuals who are English Language Learners or have substantial cultural barriers.

   Specifically, the rapid-cycle evaluation model should assess the gaps in services for TANF recipients who are also English Language Learners to facilitate the strategic use of resources and for subsequent interventions to be effective for all of Baltimore's residents (p 68-70).

Section 10-Fiscal, Performance and Other Functions

Section C:

1. Respondent recommends that MOED and the BWDB actively engage immigrant and refugee business, professional and community development associations and community-based organizations to ensure that their competitive award process is inclusive of the many adult education and workforce development service providers who provide services to Baltimore's growing immigrant and refugee community. Adequate communication regarding upcoming RFPS with these service providers can be facilitated by MOED's enhanced outreach and communication strategies with community leaders, the faith community and the aforementioned associations.

Section P:

1. Respondent recommends that to meet the needs of individuals who are English Language Learners, MOED strengthen their concurrent service delivery model to allow for individuals to identify his/her needs and receive customized assistance, including with MWE registration, from the onset. Individuals with Limited English Proficiency, substantial cultural barriers, in addition to any other barriers may disengage from services or not receive the most effective services if required to attend orientation sessions, review materials on a computer, enroll in services on a computer or conduct an online job search without understanding the clear path to training and employment and who is the point of contact. Many from this population are highly motivated, but require customer-centered service and additional supports, including extensive case management, mentorship and networking, online job application assistance and the ability to meet with staff in late evening and

weekend hours, to be successful. It is also recommended that staff receive ongoing training and technical assistance as to this population's strengths and weaknesses and strategies to build trust, provide customer-centered services and leverage the client's strengths and address the weaknesses. Some suggestions as to how to improve MOED's program metrics in regards to serving individuals who are Limited English Proficient and ensure effective service delivery include co-location of non-profit service provider on site, specified staff to serve the population or contracting with a non-profit to provide employment services (p.80).

Respondent 3

Respondent has the following recommendations:

1. Implementing a Common Definition of Homelessness: It is important that all priority populations are identified correctly and served accordingly and we commend the local plan for its inclusion of a clearly articulated definition of homelessness. However, we recommend that you incorporate additional language to demonstrate how this definition will be consistently implemented. It has been our experience that individuals, providers, and agencies hold varied perspectives on what constitutes homelessness, and it is important that workforce providers accurately identify and document homelessness status.

Additionally, homelessness can be challenging to identify, as individuals may be initially hesitant to disclose instability. In order to reduce fears about how it will impact access to services, practice and policy guidance and training should be developed to clarify the intent of questions and ensure effective engagement with individuals experiencing homelessness. Journey to Jobs and the Journey Home Initiative can provide guidance on this recommendation.

2. Prioritization of Individuals Experiencing Homelessness: We recommend that individuals experiencing homelessness be prioritized for services with a clear strategy to identify, document, and track the number of people served. We further recommend that all of the qualifying barriers that impact each individual be documented. Based on our experience working with low-income individuals and persons experiencing homelessness, potential one-stop clients may have multiple barriers to employment thereby qualifying under multiple priority populations.

Data should also be gathered both at program intake and exit, including data on housing status that can be disaggregated to assess service quality across diverse subpopulations. This level of data tracking would enable the establishment of an initial baseline number of people served that can be used to track how well one-stop centers and the integrated service delivery system are providing services, whether all priority populations are being reached, and whether clients are actually able to obtain and maintain employment.

Connecting with the local HUD office and the Journey Home Initiative would be helpful tosupport this recommendation.

3. **Outreach and Accessibility:** We recommend that the workforce development system expand their efforts at outreach and accessibility to other community entry points that provide key services including, but not limited to:

- Coordinated Entry points that provide access to homeless housing services
- Child Support Enforcement Offices
- Offices that provide access to public benefits

4. Capacity-Building: We recommend using WIOA resources to increase capacity to serve priority populations, particularly those who are experiencing homelessness and housing instability. We suggest developing a plan to pilot, replicate, and expand models and approaches that have shown success locally and/or nationally which result in integrated and sustainable services for homeless jobseekers. Through participation in the national Connections Project, Journey to Jobs can provide examples of service navigations strategies in other communities that have significantly improved the coordination of services for homeless jobseekers. For example, workforce providers could be trained to utilize the Continuum of Care's Coordinated Homeless Response System, could develop collaborative referral processes with the Continuum of Care, and co-locate services with Continuum of Care providers to ensure seamless coordination of services and appropriate, effective triage and referral processes.

5. WIOA Local Plan Data on Homelessness: We strongly support your inclusion of data and language to highlight the impact of housing instability as a barrier to employment (page 12). We recommend that you amend that paragraph to reflect the following information:

- The data source for the stated annual total of 30,000 individuals experiencing homelessness is unclear, as it is not included in the Journey Home resource cited.
- According to calendar year 2015 data available from Baltimore City's Homeless Management Information System (HMIS), 21,012 unduplicated individuals received documented services, including preventive services. [Note: This does not include homeless services from providers not participating in HMIS, individuals experiencing homelessness who did not access services, or most individuals who do not meet the HUD definition of homelessness.]

The Respondent is available to provide additional data as needed.

6. WIOA Local Plan Data on Criminal Records: We also support the inclusion of statistics on the impact of incarceration and criminal records on employment outcomes (page 12).

In addition to the reference to convictions and incarceration, we recommend that you also include a reference to the detrimental and widespread impact of criminal records regardless of conviction. It is estimated that 60% of FY15 cases were expungeable (https://www.mdexpungement.com/statistics.php), which is especially significant given the recent report indicating the frequency of stops and searches without reasonable suspicion, arrests without probably cause, and disproportionate impact on African- American residents (https://www.justice.gov/crt/file/883371/download).