



July 1, 2020 to June 30, 2024  
Workforce Innovation and  
Opportunity Act



Baltimore Workforce  
Development Board



**Baltimore City’s  
Workforce Innovation and Opportunity Act (WIOA)  
Local Workforce Plan  
July 1, 2020 - June 30, 2024  
Revised May 1, 2023**

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**Prologue:**

The Baltimore Workforce Development Board (BWDB) 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 structural and institutional racism pervade the private and public systems that control access to opportunity. Recognizing that society has failed many of our citizens, particularly those who are Black and brown, the BWDB and the Mayor's Office of Employment Development seek to build a fully coordinated workforce system of government, community organizations, and other stakeholders that will yield access to career pathways leading to jobs with family-supporting wages. Making our work more urgent and more challenging, COVID-19 created the most severe unemployment crisis since the Great Depression. **Although the economy has rebounded and unemployment in the City has returned to its pre-pandemic level, the city's residents will continue to feel its impact.** Economic downturns punish disadvantaged residents more significantly than others and for a longer duration. This makes our work to deploy effective strategies for economic security through occupational skill building, jobs, and wages even more important.

**When this Plan was first written, American Job Centers across the country had either closed or been able to offer only limited in-person services. Centers have now returned to in-person services. The closures forced the Baltimore workforce network to develop new and innovative ways to support residents and employers. We have maintained successful virtual strategies and now that our centers are fully open for customers, we have increased the ways that residents can access our services. We recognize that the job loss and financial impact caused by the pandemic will take many years to recover from and the human suffering will never be forgotten.**

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 are 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. An effective and 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 attentively and fully 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.

The BWDB and MOED will take a critical step toward building a coordinated system by instituting the two American Job Centers (One-Stop Centers) as Access Points beginning in 2021. This means that residents engaging with our Centers (virtually or in person) will have access to services provided by more specialized staff within the agency, our One-Stop partners, and other organizations outside of the WIOA system. To help ensure

that the services will effectively support our residents, the relationship between partners needs to be formalized. MOED and many other local organizations have agreed to cross-refer residents for services using a tool developed and donated by Kaiser Permanente, called “Unite Us.” This will effectively “network” partners in support of our shared partners who will receive a referral in real time and will be able to monitor progress resolving outstanding issues (or barriers to employment) and achieving outcomes.

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 make 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 federal and state 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.

When this Plan was first written, the city, state and nation had been devastated by a pandemic. Unemployment has skyrocketed. The unemployment rate was 4.9% in February of 2020 but spiked to 11.6% in March when businesses were forced to close to reduce the spread of the virus. Three years later, it had declined to 4.4% by December 2022. . But the effects of the unemployment crisis during the pandemic will continue to be felt. Over 14% 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 focuses its efforts and transitions its work under 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 2020-2024 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 2020-2024. 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

### Original Timeline:

<u>Important Dates Regarding Regional and Local Planning</u>	
<b>June 26, 2020</b>	State Plan approved by Federal partners
<b>October 1, 2020</b>	Local Boards receive guidance and timeline from State for WIOA Regional and Local Plans
<b>Dec 11, 2020</b>	Regional Plans due to MD Labor
<b>March 31, 2021</b>	Local Plans due to MD Labor

### Revised Timeline

#### Important Dates Regarding Regional and Local Planning

**Nov. 17, 2022** Local Boards receive guidance and timeline from State for WIOA Regional and Local Plans  
**Feb. 1, 2023** Regional Plans due to MD Labor  
**May 1, 2023** Local Plans due to MD Labor

## Regional Plan Requirements

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

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

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

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

Revised Regional Plans were submitted to the Maryland Department of Labor on December 11, 2020.

## Local Plan Requirements

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

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

Recognizing the significant impacts of COVID-19 and associated disruptions to services, federal and State governments are allowing extensions, flexibilities, exemptions, etc. to certain requirements of workforce development and adult education programming. DWDAL's policy on COVID-19 flexibilities can be found here: <http://www.labor.maryland.gov/employment/mpi/mpi4-20.pdf>. Local flexibilities due to COVID-19 should be noted in the Local Plans. Local Plan references to local policies should include links to the policies or the documents as attachments. Local Plan references to future actions (e.g. revise policies) should include an expected timeline.

## Section 1 – Economic Analysis

This section includes an analysis of economic elements consisting of –

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

Baltimore has ample job opportunities that span many different industries. The 3-digit NAICS industries with disclosed information that make up the largest share of Baltimore’s jobs in 2021 are shown below. As expected, “Med and Ed” make up a significant share of employment opportunities in 2021.

<b>3 Digit NAICS Industry</b>	<b>Share of All Disclosed Baltimore City Jobs in 2021*</b>	<b>Change in Size from 2011 - 2021</b>
<b>Educational Services</b>	15.4%	-1.9%
<b>Hospitals</b>	14.2%	-4.3%
<b>Professional, Scientific, and Technical Services</b>	7.5%	28.1%
<b>Ambulatory Health Care Services</b>	6.1%	34.7%
<b>Administrative and Support Services</b>	6.1%	14.7%
<b>Food Services and Drinking Places</b>	4.8%	-13.2%
<b>Justice, Public Order, and Safety Activities</b>	4.0%	-4.1%
<b>Administration of Human Resource Programs</b>	3.9%	7.7%
<b>Social Assistance</b>	2.0%	-18.2%
<b>Management of companies and enterprises</b>	2.0%	500%
<b>Other</b>	34.0%	N/A*

*Table 1. Compiled from the Quarterly Census of Employment and Wages for Baltimore City in 2021 and 2011. Of the 96 3-digit NAICS industries reported, the Bureau of Labor Statistics did not disclose employment numbers in part for 23 industries and in full for 11 industries. Consequently, these values only show the share of disclosed jobs. Most notably, no data for the Warehousing and Storage industry was disclosed, which likely would fall within the top industries for Baltimore City, as it has in past years. Due to differences in disclosure, changes in total of “Other” industries is not available.*

The Baltimore Workforce Development Board, in collaboration with the Mayor’s Office of Employment Development has selected a list of priority industries to focus its business outreach and workforce placements. These industry selections were informed by an analysis of what industries will see the most projected “target job” openings from 2019 to 2025. These target jobs were defined by 1) not requiring a bachelor’s or professional degree to access and 2) having a median wage that would earn a full-time worker at least 125% of the Lower Level Living Standard for a family of three in Baltimore City in 2019 (\$23.19 per hour). The table below shows the selected target industries, the projected number of job openings they are expected to see from 2019 to 2025, and the portion of their overall openings that fit the target job specifications.

NAICS (3-digit)	Short Description	Projected Target Job Openings 2019 - 2025	% of Openings in Target Jobs
901, 902, 903	Government	7,690	19%
541, 551, 561, 562	Professional and Business Services (includes Biotechnology)	6,688	15%
622	Healthcare: Hospitals	2,997	12%
238	Construction: Specialty Trade Contractors	2,573	56%
621	Healthcare: Ambulatory Health Care Services	1,959	13%
611	Educational Services	1,772	7%

Table 2. Target Industries for Baltimore City. Calculated using data from EMSI.

Collectively, these industries yield 39 target occupations (in alphabetical order) with at least 100 projected job openings anticipated for them. These are listed below:

Target Occupations within Target Industries for Baltimore City	
Cardiovascular Technologists and Technicians	Heavy and Tractor-Trailer Truck Drivers
Civil Engineering Technicians	Legal Secretaries
Claims Adjusters, Examiners, and Investigators	Legal Support Workers, All Other
Computer Network Support Specialists	Licensed Practical and Licensed Vocational Nurses
Computer User Support Specialists	Medical Records and Health Information Technicians
Construction and Building Inspectors	Operating Engineers and Other Construction Equipment Operators
Dental Hygienists	Paralegals and Legal Assistants
Diagnostic Medical Sonographers	Physical Therapist Assistants
Electricians	Plumbers, Pipefitters, and Steamfitters
Eligibility Interviewers, Government Programs	Police, Fire, and Ambulance Dispatchers
Engineering Technicians, Except Drafters, All Other	Postal Service Mail Carriers
Executive Secretaries and Executive Administrative Assistants	Production, Planning, and Expediting Clerks
Firefighters	Radiologic Technologists
First-Line Supervisors of Construction Trades and Extraction Workers	Respiratory Therapists
First-Line Supervisors of Correctional Officers	Sales Representatives, Services, All Other
First-Line Supervisors of Fire Fighting and Prevention Workers	Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products
First-Line Supervisors of Mechanics, Installers, and Repairers	Sheet Metal Workers
First-Line Supervisors of Office and Administrative Support Workers	Surgical Technologists
First-Line Supervisors of Protective Service Workers, All Other	Tax Preparers
Heating, Air Conditioning, and Refrigeration Mechanics and Installers	

Table 3. Target Occupations for Baltimore City. Identified using data from EMSI.

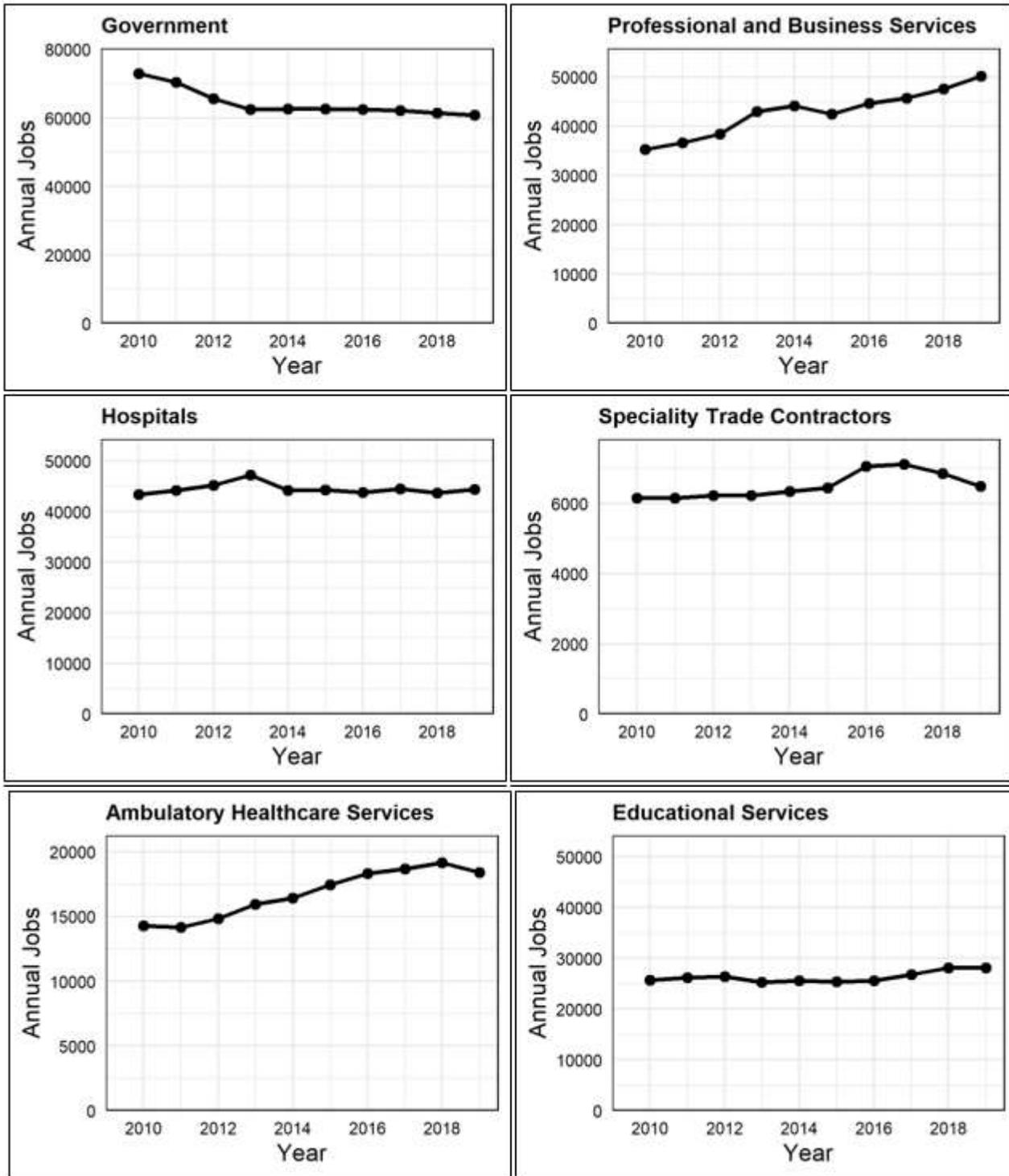


Figure 1. Compiled from Quarterly Census of Employment and Wages for Baltimore City from 2010 – 2019.

Ultimately, however, these target occupations only make up 14% of the expected job openings in Baltimore City, which means that 86% of new jobs in Baltimore will either 1) require a bachelor's degree or professional degree or 2) pay less than 125% of the LLSIL for a family of three. This puts a significant limitation on the city's ability to ensure everyone gets a job that can provide for their means and thus, mandates Baltimore's workforce system must look beyond target occupations and towards increasing work quality for every job in the city. As long as political and economic conditions support and rely on a wide swaths of full-time workers earning low-wages, then even the greatest workforce development programs will not be able to lift all Baltimoreans from poverty.

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

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

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

This section of the city's plan speaks to the first four Strategic Goals of the *Benchmarks of Success* and include a description of the strategic planning elements consisting of –

- (A) An analysis of the knowledge and skills needed to meet the needs of the businesses in the Local Area, including employment needs in in-demand industry sectors and occupations.<sup>1</sup>

Getting individuals access to these jobs and towards a sustainable career pathway in many cases requires providing them access to workforce training, certifications, and licensures. The table below shows common certifications or credentials associated with the 39 target occupation from the six target industries:

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<sup>1</sup> There are a variety of ways to determine the knowledge and skills needed to meet the employment needs (e.g., employer surveys, real-time LMI). Real-time LMI (e.g., Certifications Advertised, Advertised Education Level) is available at: <https://mwejobs.maryland.gov>

Target Occupation	Common Certifications for Occupation
Cardiovascular Technologists and Technicians	Cardiovascular Credentialing International Certifications
Civil Engineering Technicians	Associate's Degree in Civil Engineering
Claims Adjusters, Examiners, and Investigators	MD Public Adjuster License
Computer Network Support Specialists	<i>Varies by technology</i>
Computer User Support Specialists	<i>Varies by technology</i>
Construction and Building Inspectors	72 Hour Home Inspection Training Course
Dental Hygienists	<ul style="list-style-type: none"> <li>– Associate's Degree in Dental Hygiene</li> <li>– MD Dental Hygiene License</li> <li>– CPR Certification</li> </ul>
Diagnostic Medical Sonographers	Associate's Degree in Diagnostic Medical Sonography
Electricians	MD Master Electrician License (7 years of experience)
Eligibility Interviewers, Government Programs	
Engineering Technicians, Except Drafters, All Other	NICET Certification
Executive Secretaries and Executive Administrative Assistants	
Firefighters	National Registry of Emergency Medical Technicians (EMT)
First-Line Supervisors of Construction Trades and Extraction Workers	<i>Varies by trade</i>
First-Line Supervisors of Correctional Officers	Correctional Training Academy (OTJ)
First-Line Supervisors of Fire Fighting and Prevention Workers	<i>See Firefighters</i>
First-Line Supervisors of Mechanics, Installers, and Repairers	
First-Line Supervisors of Office and Administrative Support Workers	Certification by the American Payroll Association (APA)
First-Line Supervisors of Protective Service Workers, All Other	
Heating, Air Conditioning, and Refrigeration Mechanics and Installers	MD Heating, Ventilation, Air Conditioning, and Refrigeration Contractors Licenses
Heavy and Tractor-Trailer Truck Drivers	Commercial Driver's License
Legal Secretaries	
Legal Support Workers, All Other	<i>See Paralegals</i>
Licensed Practical and Licensed Vocational Nurses	Practical Nursing Certificate
Medical Records and Health Information Technicians	<ul style="list-style-type: none"> <li>– Registered Health Information Technician</li> <li>– Certified Tumor Registrar</li> </ul>
Operating Engineers and Other Construction Equipment Operators	<ul style="list-style-type: none"> <li>– Commercial Driver's License (CDL)</li> <li>– CCO Mobile Crane Operator Certification</li> </ul>
Paralegals and Legal Assistants	<ul style="list-style-type: none"> <li>– Associate's Degree in Paralegal Studies</li> <li>– Paralegal/Legal Assistant Certificate</li> </ul>
Physical Therapist Assistants	Associate's Degree in Physical Therapist Assistants
Plumbers, Pipefitters, and Steamfitters	<ul style="list-style-type: none"> <li>– MD Plumber/Gas Fitter License</li> <li>– Earn additional licenses with work experience</li> </ul>

Police, Fire, and Ambulance Dispatchers	
Postal Service Mail Carriers	
Production, Planning, and Expediting Clerks	
Radiologic Technologists	American Registry of Radiologic Technologists Certification
Respiratory Therapists	Associate's Degree in Respiratory Care
Sales Representatives, Services, All Other	<i>Varies by goods sold</i>
Sales Representatives, Wholesale and Manufacturing, Except Technical and Scientific Products	
Sheet Metal Workers	<ul style="list-style-type: none"> <li>– American Welding Society Welding Certification</li> <li>– International Training Institute for the Sheet Metal and Air Conditioning Industry Building Information Modeling Certification</li> <li>– Fabricators &amp; Manufacturers Association International Precision Sheet Metal Operator Certification</li> </ul>
Surgical Technologists	National Board of Surgical Technology and Surgical Assisting Certified Surgical Technologist Certificate
Tax Preparers	MD Individual Tax Preparer Registration

Table 4. Common certifications for Baltimore City target occupations. Identified using the Bureau of Labor Statistics Occupational Outlook Handbook.

O\*NET Online publishes lists of skills, abilities, and knowledge associated with occupations according to the Standard Occupational Classification system. Each of these items has an associated “score” showing the relative importance of them for that occupation. By collecting these data for each occupation and summing the associated scores together, an understanding of the relative importance of skills, abilities, and knowledge for getting people into these target occupations can be generated. The Figure 2, 3 and 4 below show the most common skills, abilities, and knowledge associated with the target occupations and their relative importance.

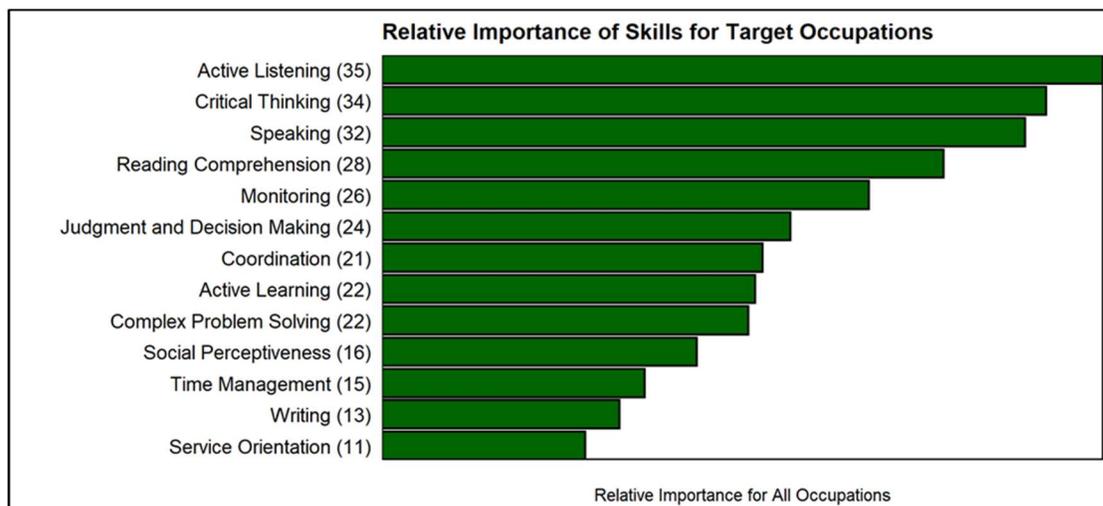


Figure 2. This plot shows the relative importance of skills amongst 35 target occupations with associated skills on the O\*NET Online website. Most occupations (35 of 39 target occupation) have associated skills and a score showing how important it is for that occupation. These scores were summed and plotted on a relative axis. The numbers next to the names show the number of target occupations associated with the skill (of 35 total). Only skills with 10 or more associated occupations are plotted.

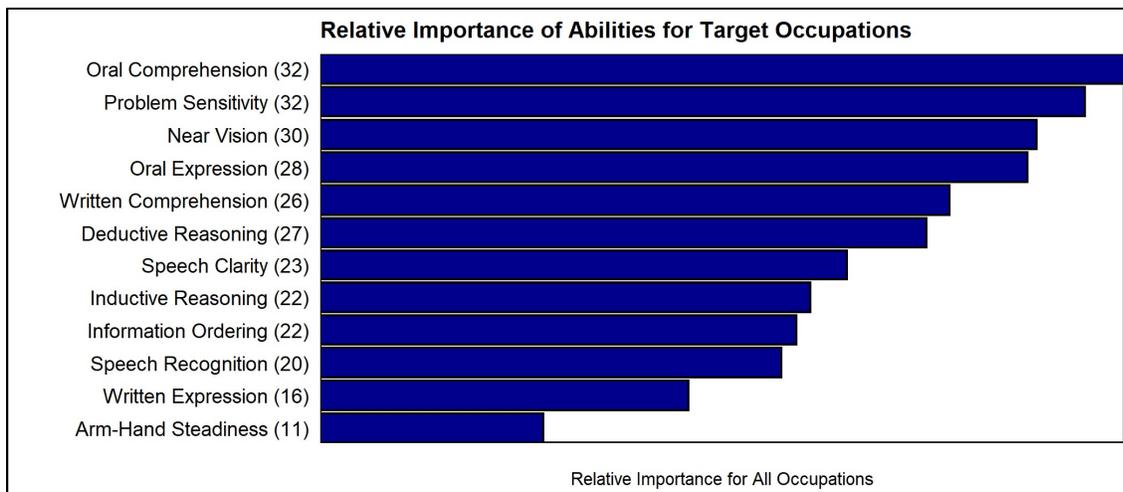


Figure 3. This plot shows the relative importance of abilities amongst 35 target occupations with associated abilities on the O\*NET Online website. Most occupations (35 of 39 target occupation) have associated abilities and a score showing how important it is for that occupation. These scores were summed and plotted on a relative axis. The numbers next to the names show the number of target occupations associated with the abilities (of 35 total). Only abilities with 10 or more associated occupations are plotted.

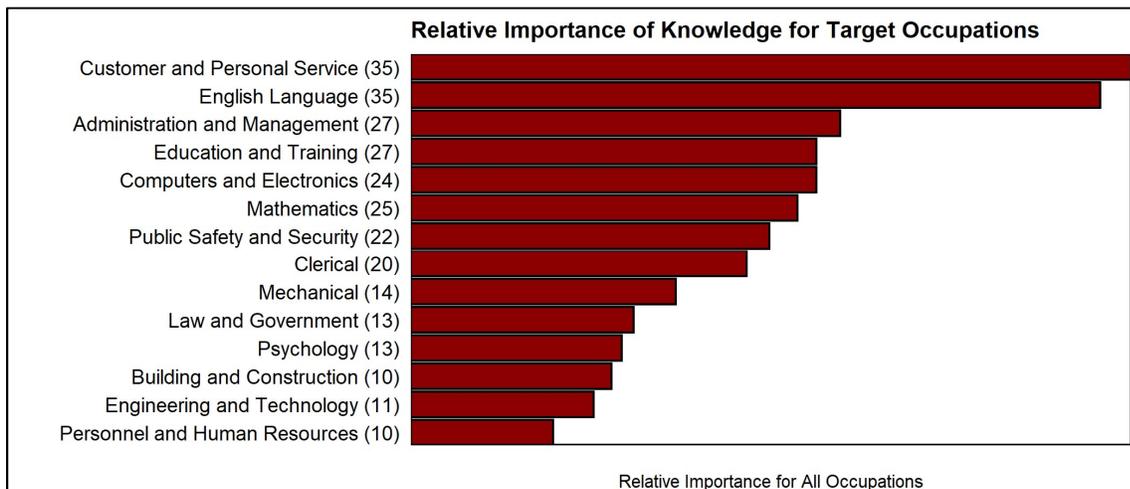


Figure 4. This plot shows the relative importance of knowledge amongst 35 target occupations with associated knowledge on the O\*NET Online website. Most occupations (35 of 39 target occupation) have associated knowledge and a score showing how important it is for that occupation. These scores were summed and plotted on a relative axis. The numbers next to the names show the number of target occupations associated with the knowledge (of 35 total). Only knowledge with 10 or more associated occupations are plotted.

A list of technologies associated with jobs is also available for each position; however, there is no associated score ascribing how relevant it is to the positions. Figure 5 below shows how many occupations are associated with each technology.

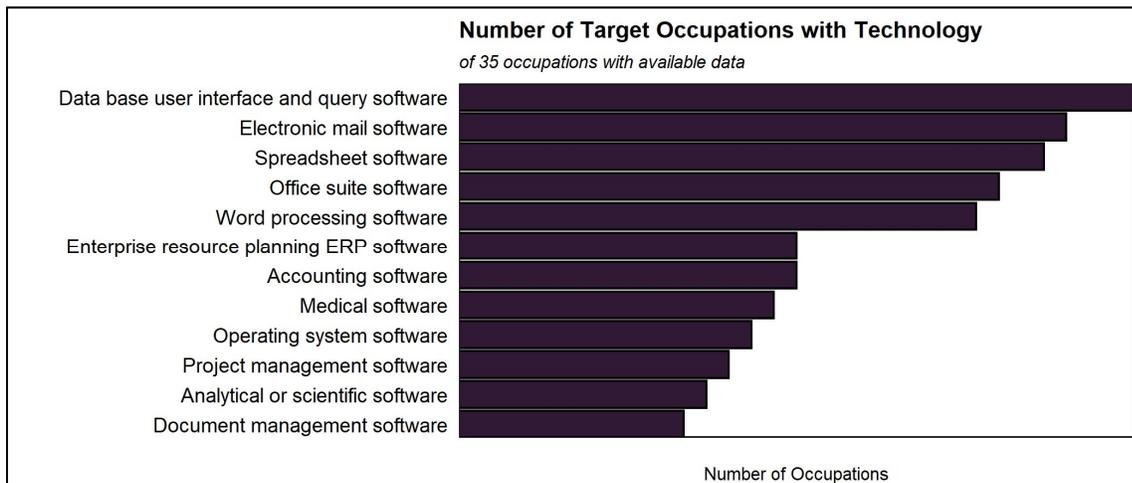


Figure 5. This plot shows the number of target occupations amongst 35 with associated each technology on the O\*NET Online website. Most occupations (35 of 39 target occupation) have associated technology. Only technology with 10 or more associated occupations are plotted.

Most importantly, as a trusted partner of many businesses in Baltimore, it is incumbent upon the Baltimore Workforce Development Board and Mayor’s Office of Employment Development to challenge their existing unconscious and conscious assumptions about what skills, abilities, knowledge are “essential” for a job. For example, training programs assume that diagnostic tests that focus on grade-level proficiency in reading and math, should be used as cut-offs for access to training opportunities; however, some jobs that appear technical on their face only require understanding a small portion of the entire content of a 10th grade math class.

Another example of challenging employer expectations is the passage MD Senate Bill 531 (2020) which expands Maryland’s definitions of race to include “traits associated with race including hair texture, afro hairstyles, and protective hairstyles [like braids, twists, and locks].”<sup>1</sup> As a result, hiring discrimination protections are extended to further protect people based on having hair styles associated with Black culture. This bill was only necessary because some employers decided that having straight hair was essential for their work without questioning the basis for that decision. Challenging dress codes and communication expectations of employers on similar grounds may yield greater access to job opportunities for Baltimoreans of color, whose grounds for dismissal or not hiring are based on reasons directly associated with their race.

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

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

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

<sup>1</sup> MD. Code Ann, State Government § 20-101 (2019)

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

### Baltimore City - Inflation-Adjusted Average Weekly Wages as of November 2022



Figure 6. Source: Bureau of Labor Statistics. Average Weekly Wage data for Baltimore City was adjusted for inflation using Consumer Price Index (CPI) data from the Baltimore-Columbia-Towson Metropolitan Area, since the BLS does not publish CPI data for Baltimore City regularly. CPI data at the metropolitan statistical area level is published every other month, so missing values were interpolated as the average between the two published months. In cases where the most recent month is missing data, the CPI for the most recent month is extrapolated by adding the average monthly change over the year to the most recently available data. The red dotted line represents Maryland's State of Emergency Declaration in response to the COVID-19 Pandemic in March 2020. Note that Average Weekly Wage only considers wages of workers, and thus, inflation-adjusted average weekly wages rose at the start of the COVID-19 pandemic, due to a disproportionate share of low-wage workers losing their jobs (especially in the hospitality industry) as compared to higher-wage workers. Dotted horizontal lines represent the min and max inflation-adjusted average weekly wages since 2010.

Located in central Maryland, Baltimore City is the urban hub of the Baltimore-Columbia-Towson metropolitan statistical area (MSA) and the largest city in Maryland. In 2019, Baltimore's population was 576,498<sup>2</sup>, a 39% drop from its peak of 949,708<sup>3</sup> in 1950, which preceded the "white flight" most prominent in from the 1950's to the 1970's. For the first decade of the new millennium, Baltimore City was losing an average of 480 jobs monthly, in contrast to the state of Maryland, which was gaining 1,250 jobs monthly in the same period. This trend of declining employment opportunities was reversed with Baltimore City gaining an average of 250 jobs a month from 2010 through February of 2020.<sup>4</sup> As a result,

<sup>2</sup> U.S. Census Bureau. (2019). 2019 American Community Survey 1-Year Estimates.

<sup>3</sup> U.S. Census Bureau. (1951). Number of Inhabitants Maryland. Retrieved from <https://www2.census.gov/library/publications/decennial/1950/population-volume-1/vol-01-23.pdf>

<sup>4</sup> Based on an analysis of Bureau of Labor Statistics – "State and Area Employment, Hours, and Earnings" data retrieved 11/24/2020. Seasonally adjusted data was used.

from April 2019 to February 2020, each month hit the lowest monthly unemployment rate for Baltimore City on record for that month since 1990 with a low point of 4.2% in December 2019. Then the global coronavirus pandemic happened.

Like the rest of the country, Baltimore experienced heavy layoffs with many industries shrinking, especially the Leisure & Hospitality (15,300) and Administrative Support & Waste Management & Remediation Services (4,700) industries. Baltimore City unemployment claims peaked, from 378 claims the week ending March 7<sup>th</sup> to 10,691 the week ending April 4<sup>th</sup>. At the same time, Baltimore's labor force size, a measure of its population that is working or actively looking for work, shrank from 291,943 in February 2020 to a nadir of 273,922 in February of 2021.<sup>5</sup> Government services like expanded unemployment benefits (Pandemic Unemployment Assistance, Pandemic Emergency Unemployment Compensation, and Extended Benefits), expanded child tax credits, rental assistance, stimulus payments, expanded Medicaid access helped fill gaps left by the seismic shift in unemployment.<sup>6</sup>

Fast forward to today and the recovery has been uneven. In September 2022, total non-farm employment opportunities in Baltimore City reached a 19-year high point of 383,100, while Baltimore City's October 2022 labor force was 4.2% smaller than it was in February of 2022. With historic high job opportunities and lower labor force to pull from, one would expect historically low unemployment and wages for Baltimoreans. This isn't true, though. The unemployment rate for Baltimoreans in September 2022 was 5.1%, relatively low, but higher than its 10-year pre-pandemic low point of 4.3% in May of 2019.

One reason we see significant gains in total jobs, but lesser gains in unemployment rate relative to historical data may be the result of the exacerbation of a long-standing trend of where Baltimore's workforce lives based on Longitudinal Employer-Household Dynamics Survey (LEHDS) data. In 2002, 41.6% of individuals who worked in Baltimore lived in Baltimore too. While this was well below the average of 49.6% for Maryland counties at the time, it was well above the 33.0% of Baltimore workers who lived in the city as of 2019. While the average county saw a 2.7% drop in their share of local workforce from 2002 to 2019, Baltimore's 8.6% drop is significantly greater. It's likely that since 2019 (the most recently available LEHDS data) many Baltimore jobs transitioned to telework, which would only reinforce this trend further.<sup>7</sup>

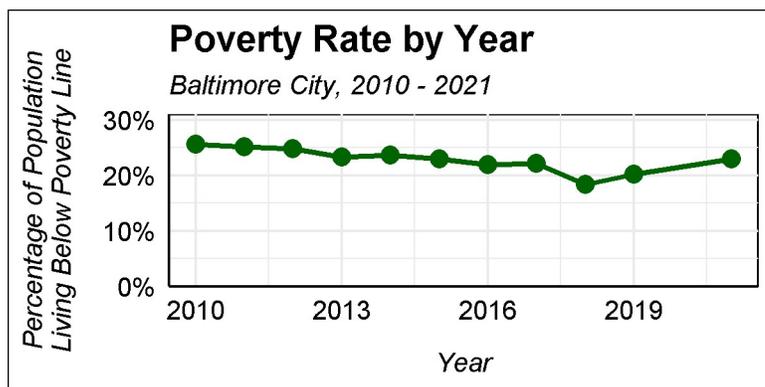
Throughout all these shifts in unemployment, an analysis of relative average wages based on monthly Consumer Price Index data for the Baltimore-Columbia-Towson Metropolitan Statistical Area (BCT MSA) shows that the wage of the inflation-adjusted wage of the average Baltimore worker increased at the start of the pandemic. While it can't be said for sure, it is more likely than not, that these gains are due to the loss of low-wage jobs, especially in the leisure and hospitality industry, which increased the average wage of the remaining workers. Since then, the average inflation-adjusted wages have returned to the lower end of its post-2010 baseline (see Figure 6).

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<sup>5</sup> Note, labor force is the sum of individuals employed, self-employed, working in a family business, or unemployed and either seeking work or expecting to be called back into work after a temporary lay-off. More information on the definition of labor force can be found at the BLS website here: <https://www.bls.gov/cps/definitions.htm#laborforce>

<sup>6</sup>In fact, research by the Economic Policy Institute shows declines in the poverty rate from 2019 to 2021 in large part due to expanded government relief programs: <https://www.epi.org/blog/the-2021-census-report-highlights-how-government-relief-measures-played-a-vital-role-in-reducing-poverty/>

<sup>7</sup> The 2021 ACS 1-Year Estimates Subject tables showed 24.1% of Baltimoreans worked at home, while this number was only 4.5% in 2011.



While wages have not increased drastically during the period, this decrease in unemployment from 2010 to 2019 was able to lift more Baltimoreans out of poverty. The portion of Baltimore City’s population living below the poverty line improved from 25.6% in 2010 to 20.2% in 2019 (Figure 7). Unfortunately, the number has increased to 23% in 2021 due to the economic downturn and insufficient governmental response caused by the pandemic.

According to the U.S. Bureau of Labor Statistics, the Baltimore-Columbia-Towson MSA contained 47% of the civilian labor force and 52% of non-farm employment for the state of Maryland in August 2020. Baltimore City residents made up 19% of total non-farm employment for the Baltimore-Columbia-Towson MSA area in August 2020,<sup>8</sup> while comprising 21% of the region’s population according to the ACS 5-Year Estimates from 2018.<sup>9</sup>

### Residency of Workers in Baltimore

Baltimore City is unique amongst other county jurisdictions in Maryland in its plethora of work opportunities and scale of its unemployment. According to the LEHDs data in 2015, with over 348,000 jobs in Baltimore City in 2019, Baltimore was the county with the third highest number of work opportunities after Montgomery County and Baltimore County. About 234,000 of these work opportunities (representing 67% of jobs) were taken by individuals who lived outside of Baltimore City. At the same time, only about 142,000 Baltimoreans worked in a jurisdiction other than Baltimore. Baltimore has many good jobs, but Baltimoreans aren’t working most of them.

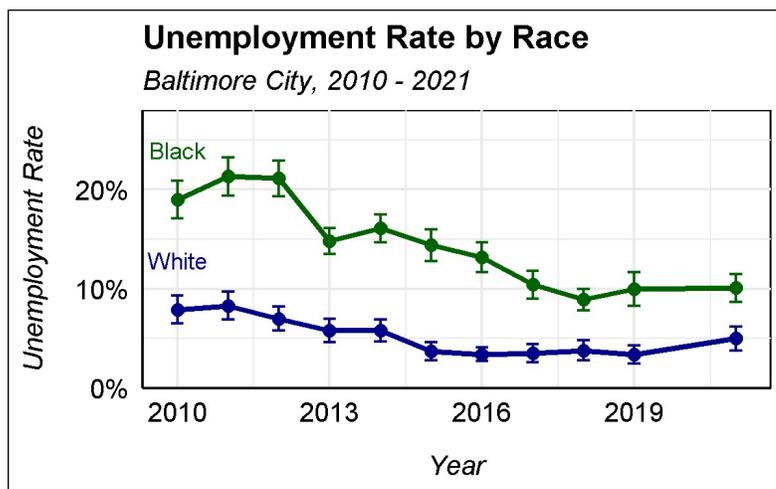
The City of Baltimore provides almost 90,000 more jobs to residents of other jurisdictions than other jurisdictions provide to Baltimoreans (this disparity will be called a “workforce trade deficit”). With fewer than 16,000 unemployed Baltimoreans as of October 2022 according to the Bureau of Labor Statistics’ Local Area Unemployment Statistics, even a modest increase in local hiring would make a significant difference in reducing unemployment.

### Race and Employment

This workforce deficit means that Baltimore has ample job opportunities within its city boundaries, but its residents have not been connected to these jobs. While there are many factors that contribute to this disparity, the most prominent is the scourge of systemic racism. With 62.6% of its population identifying as “Black or African American”, Baltimore’s population is made up of a larger share of Black residents than any other jurisdiction in Maryland.

<sup>8</sup> United States. Bureau of Labor Statistics. “State and Area Employment, Hours, and Earnings.” Current Employment Estimates – CES, U.S. Dept. of Labor, <https://www.bls.gov/ces/>. Accessed 20 November 2020.

<sup>9</sup> U.S. Census Bureau. (2019). 2013-2018 American Community Survey 5-Year Estimates. Retrieved from



The development of the American workforce has its foundations in marginalizing Black people and limiting their opportunities for agency and prosperity. Most apparent among these historical marginalizing powers is the violently forced unpaid labor of slavery; however, in every aspect of economy<sup>10</sup> blacks were shut out of the same opportunities white people had from earning an education, attaining stable housing, and utilizing public transportation.<sup>11</sup> With Jim Crow laws, whites were able to change the name of slavery<sup>[12]</sup> without losing the exploitative content: prison labor, a practice that<sup>12</sup> today<sup>[13]</sup>. In places like Tulsa, Oklahoma (whose Greenwood District was

known as Black Wall Street) in 1921, the very desire to build Black<sup>13</sup> wealth was met with wanton destruction and murder.<sup>[14]</sup> Following the passage of the Civil Rights Act and the end of de jure segregation, the War on Drugs reinforced de facto segregation by disproportionately targeting Black populations from the focus of policing in cities and largely Black<sup>14</sup> sentencing disparity of crack versus powder cocaine at the federal and state levels.<sup>15</sup> Given the preponderance of formal and informal criminal background checks, disparities in sentencing yield disparities in job attainment.<sup>[16]</sup> These systemic biases are built-upon individual bias and reinforce individual biases in employers. For example, a meta-analysis of field experiments shows that white candidates with the same credentials as Black candidates were 36% more likely to get callbacks. This callback rate for Black applicants had not changed in hiring during the<sup>16</sup> the study.<sup>[17]</sup>

Between 2015 and 2019, Baltimore's Black unemployment rate was on average 3.2 times higher than the white unemployment rate. At the same time, per-capita income of non-Hispanic/Latinx White people in Baltimore City is over double that of Black or African American and Hispanic or Latinx individuals, and these disparities aren't getting better. The per capita income gap between these two groups grew by over \$15,000 since 2010. Thus, it isn't a surprise that Baltimore's unemployment rate was 7.3% in 2021

<sup>10</sup> Anderson, G. M., Halcoussis, D. (1996). The political economy of legal segregation: Jim Crow and racial employment patters. *Economics & Politics* 8(1). Retrieved from <https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1468-0343.1996.tb00117.x>

<sup>11</sup> The exact text of the 13<sup>th</sup> amendment of the US Constitution states that "neither slavery nor involuntary servitude, except as a punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction" (U.S. Const. amend. XIII).

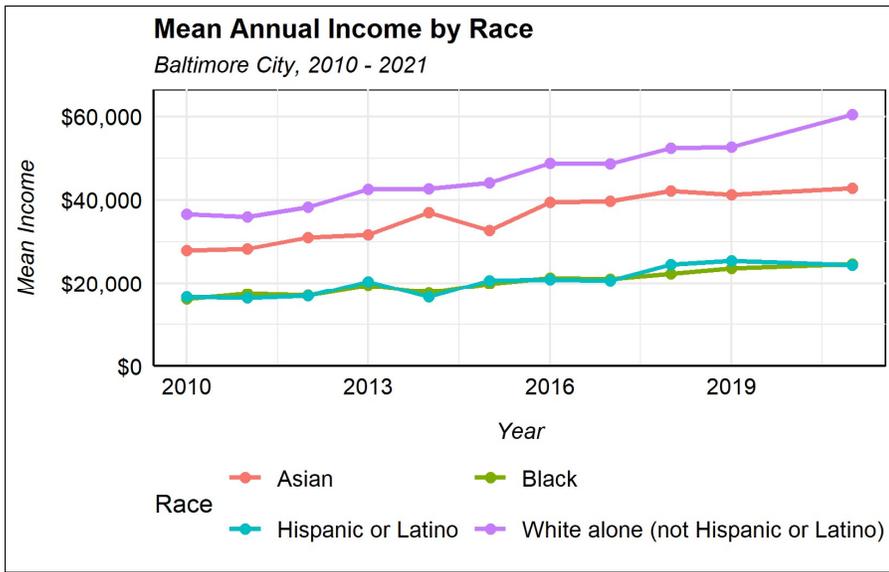
<sup>12</sup> A report by Justice Policy Institute showed that in July 2018 more than 70% of Maryland's prison population was black, the highest share in America, twice Black people's share of the state population, and twice the national average. *Rethinking Approaches to Over Incarceration of Black Young Adults in America*. (2019), Justice Policy Institute. Retrieved from [http://www.justicepolicy.org/uploads/justicepolicy/documents/Rethinking\\_Approaches\\_to\\_Over\\_Incarceration\\_MD.pdf](http://www.justicepolicy.org/uploads/justicepolicy/documents/Rethinking_Approaches_to_Over_Incarceration_MD.pdf)

<sup>13</sup> Fain, Kimberly (July 5, 2017). The Devastation of Black Wallstreet. *JSTOR Daily*. Retrieved <https://daily.jstor.org/the-devastation-of-black-wall-street/>

<sup>14</sup> The Fair Sentencing Act was passed in 2011, which reduced the disparity in the amount of each substance to trigger federal criminal penalties from 100:1 to 18. *Fair Sentencing Act, S. 1789, 111<sup>th</sup> Cong.* (2010). <https://www.congress.gov/bill/111th-congress/senate-bill/1789>

<sup>15</sup> Harris, P. M., Keller, K. S. (2005). Ex-Offenders Need Not Apply. *The Criminal Background Check in Hiring Decisions*. *Journal of Contemporary Criminal Justice*, 21(1). Retrieved from <https://journals.sagepub.com/doi/abs/10.1177/1043986204271678>

<sup>17</sup> Quillian, L., Pager, D., Hexel, O., Midtbøen, A. H. (2017). Meta-analysis of field experiments shows no change in racial discrimination in hiring over time. *PNAS* October 10, 2017. 114 (41). Retrieved from <https://www.pnas.org/content/114/41/10870>

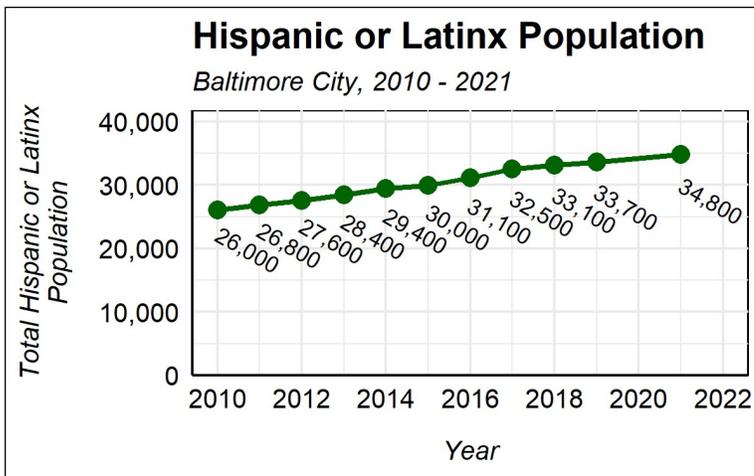


compared to 5.9% for the state of Maryland. As long as institutional, structural, and interpersonal racism persist, so too will Baltimore face significant hurdles to providing good jobs to all its people.<sup>18</sup>

While they comprise a smaller portion of Baltimore’s population, individuals identifying as Asian (2.5%), American Indian and Alaska Native (0.3%), and Native Hawaiian and Other Pacific Islander (0.05%) peoples have contributed significantly to its economic and cultural development. In Baltimore, a large share of corner stores is owned by Korean

Americans, many of which may need to change their business models or close down due to zoning laws aimed at closing liquor stores to reduce violence.<sup>19</sup> While Baltimore today sits on Piscataway land, the majority of its American Indian population are Lumbee, with Baltimore having the largest Lumbee population in the US outside of their native land.<sup>20</sup> Most recent available data from the American Community Survey 2018 5-Year Estimates puts unemployment for Asians (3.0%) below all other racial groups at the time, while Baltimore’s American Indian and Alaskan Native (7.0%) and Native Hawaiian and Other Pacific Islander (5.3%) unemployment rates were below its overall rate at 9.1%, but above that of the white population (4.1%).

## Hispanic/Latinx Identity and Employment



Baltimore’s Latinx and Hispanic population has grown by 34% from 26,031 in 2010 to 34,810 in 2021, an impressive growth given Baltimore’s overall population has declined in the same period. In large part, Baltimore’s Latinx and Hispanic population are recent immigrants that have settled in the Southeast corner of the city. This growth in Latinx immigrant communities is in large part due to inclusive growth strategies that Baltimore has employed, from passing resolutions to encourage the establishment of a center for day workers to assemble while they wait for work opportunities to executive orders that instruct city personnel not to inquire individuals about their immigration status except when required by federal or state law.<sup>21</sup>

<sup>18</sup> U.S. Census Bureau. (2019). 2019 American Community Survey 1-Year Estimates Subject Tables. Retrieved using the Census Subject Tables API.

<sup>19</sup> Cohn M., Rector K. (June 18, 2020). Korean-American liquor store owners feel targeted by city. The Baltimore Sun, retrieved from <https://www.baltimoresun.com/>

<sup>20</sup> Baltimore’s Lumbee population declined significantly in the early 1970s due to an urban renewal development project that destroyed many of their residences. Source: Spiegel, I. (October 5, 2020). A Native American Community in Baltimore Reclaims Its History. *Smithsonian Magazine*, retrieved from <https://www.smithsonianmag.com/>

<sup>21</sup> Filomeno, F. A. (2015), The Migration-Development Nexus in Local Immigration Policy: Baltimore City and the Hispanic Diaspora, *Urban Affairs Review*, 51(1), pages 102-137. Retrieved from <https://journals.sagepub.com/doi/abs/10.1177/1078087415614920>

According to the ACS 1-Year Estimates Subject Tables, the unemployment rate of Baltimore’s Hispanic/Latinx population sat around 8.5% in 2021.

Spanish is the most common second language spoken in Baltimore City households with 23,364 people over age 5 (4.2% of Baltimore City’s 5+ year old population) able to speak Spanish in 2019; however, in the same year, 8,906 of those Spanish-speakers (38.1% of all Spanish-speaking Baltimoreans) stated that they speak English “less than ‘very well.’” In response to this, Baltimore City Public Schools have expanded ESOL programs and staff with foreign language competence;<sup>18</sup> however, the share of Spanish-speakers that state the speak English “less than ‘very well’” has only decreased by 4% since 2010 according to the American Community Survey 1-Year Estimates Subject Table.<sup>22</sup> As noted, English Language was the second most important “Knowledge” for attaining the well-paying target occupations, so individuals that have not yet attained fluency with it will likely find getting well-paying jobs difficult.

A particularly disturbing nationwide trend, which is also true for Maryland is the increased prevalence of workplace deaths for Hispanic or Latinx workers compared to other ethnic groups.<sup>23</sup> In Maryland in 2020, the mortality rate for working Hispanic and Latinx folks was 5.8 per 100,000 compared to 1.2 per 100,000 for non-Hispanic/Latinx white and 1.4 for Black Marylanders, over four times as high. There are many theories suggested to explain this disparity, from structural segregation that leads Latinx and Hispanic folks to sort into more dangerous occupations and coercion by OSHA non-compliant workplaces enabled by insufficient workplace protections and worker economic precarity. Ultimately, the needless loss of our neighbors' lives demonstrates that improper support and empowerment of workers is literally a life-or-death issue.

## Incarceration

While Baltimore City pretrial bookings and commitments to MD Department of Public Safety and Correctional Services facilities were four times smaller than they were at their peak in 2004, over 4,800 Maryland inmates (on January 1, 2019) listed their home address in Baltimore City (27% of all MD inmates). As jail and prison populations circulate and criminal records can often follow people for decades or their lives, this means a sizable share of Baltimoreans have criminal records. Some opportunities exist for employment for some during prison stays,<sup>24</sup> but those leaving prison face many barriers to employment.

## Homelessness

Adjusting for inflation in the Baltimore Columbia Towson Metropolitan Statistical area, the inflation-adjusted median rent in Baltimore City grew by 6% from 2015 – 2021. This is at the same time as average inflation-adjusted wages remain stagnant.<sup>25</sup> It’s no wonder that a study out of University of Washington Evictions Project showed that Baltimore City’s eviction rate was 5.3% in FY2019, compared to 2.3% nationwide. These economic conditions build towards a natural increase in homelessness without

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<sup>22</sup> U.S. Census Bureau. (2010 - 2019). 2010 - 2019 American Community Survey 1-Year Estimates Subject Tables. Retrieved using the Census Subject Tables API.

<sup>23</sup> Bureau of Labor Statistics. (March 3, 2022). Share of workplace deaths among Hispanic and Latino workers continued to rise in 2020. Retrieved from: <https://www.bls.gov/opub/ted/2022/share-of-workplace-deaths-among-hispanic-and-latino-workers-continued-to-rise-in-2020.htm>

<sup>24</sup>In FY20 about incarcerated individuals worked 2.1 million hours earning the Maryland Correctional Enterprises (MCE) over \$55 million in sales while receiving payroll costs of 2.46 million dollars, yielding a net pay rate of about \$1.17 per hour. This would make this MCE’s inmate payroll costs between about 4% of total gross revenue. When factoring in payroll costs of MCE employees, the payroll to revenue ratio sits around 20%. Data from the ECN Core Statistics Summary Statistics for the U.S. States, and Selected Geographies, shows typical payroll to gross revenue costs around 23% in 2017 for all industries in Maryland. Sourced from MD Division of Corrections FY2019 report and Maryland Correctional Enterprises FY2019 Report.

<sup>25</sup> Median rent calculated from American Community Survey 1-Year Estimates Data Profiles. Inflation for the Baltimore-Columbia-Towson Metropolitan Statistical Area calculated from Bureau of Labor Statistics Consumer Price Index data.

meaningful intervention.

Based on a 2020 point in time count survey conducted by Journey Home, on any given night, about 2,193 people in Baltimore were experiencing homelessness. According to The Journey Home, the majority of these individuals are adults, with 20% of women and 15% of men being in a family of at least one child and adult.<sup>26</sup> Lack of consistent housing alone complicates the employment process; however, the multitude of employment barriers linked to homelessness, including physical and mental health issues, a criminal background, education level, and lack of reliable transportation, make it especially important that comprehensive supports are provided for individuals experiencing homelessness. While employment is often seen to lift one out of homelessness, given the complications of maintaining a job without stable housing, many advocates employ a Housing First perspective, that prioritizes finding individuals stabilized housing before addressing other personal goals, including employment.

## Education

In Baltimore, education is strongly linked to employment status, with almost one quarter of individuals without a high school diploma being unemployed in 2019, compared to 2.9% of individuals with a Bachelor's or higher being employed. Fortunately, since 2010 the portion of Baltimore City's population ages 25+ with a high school diploma grew from 76.9% in 2010 to 85.7% in 2019 according to the Census' American Community Survey.

While this growth is positive, the reality is that attaining a well-paying job without a high school diploma is nearly impossible, with 0.3% of all expected openings in target jobs from 2019 – 2025 in occupations that don't require a high school diploma or secondary-degree or credential. This leaves 50,000 Baltimoreans without a high school diploma to compete for 380 well-paying job openings (and these individuals will be competing with people who have high school diplomas and other educational credentials, in addition to those outside Baltimore City).

These target job openings expand dramatically to 25,060 for individuals when individuals with a high school diploma are included; however, with over 118,000 individuals with a high school diploma in Baltimore<sup>27</sup>, even if every one of these jobs went to Baltimoreans with a high school diploma, the job market mandates the vast majority of these Baltimoreans must work low-wage jobs, unless wages start increasing rather than staying stagnant as they have during the period of the lowest unemployment in Baltimore in the past three decades. It's important to note that, even if every member of Baltimore's labor force had three PhDs, Baltimore would still need custodial workers, laundry and dry cleaners, food-preparation workers, home health aides, dog walkers, housekeepers, and many other jobs that historically pay low wages. Until all jobs pay a living wage, from a labor perspective, improving educational outcomes isn't sufficient to lift all Baltimoreans out of poverty.

## Disability

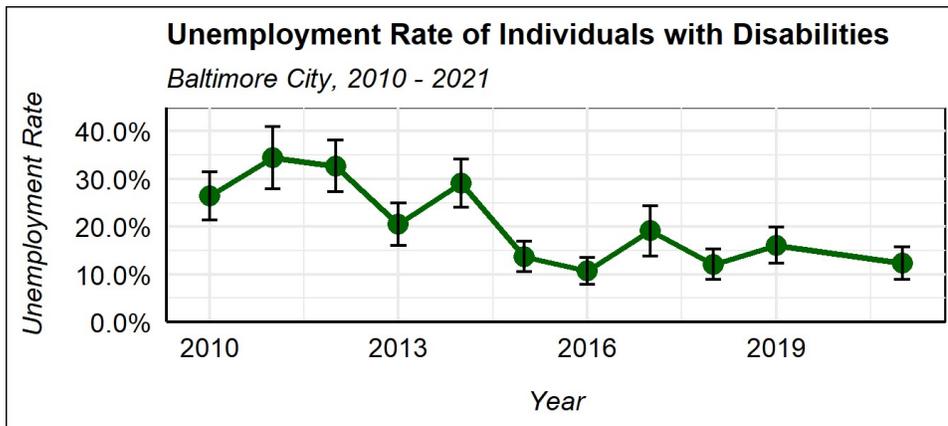
Defining disabilities is a social construct, as deficiencies in one's capability to do certain tasks are only described as disabilities if those tasks are considered relevant in today's world in the specific places that person operates. In today's world, an ability to interact with other people in a social context may be significantly more important than it was several hundred years ago when social networks were less connected. In the workforce arena, atypical traits that may hamper one's ability to succeed in one occupation could be assets in another. While someone taller than six feet may be highly successful in a basketball game, they would be relatively hampered as a jockey. The same may be said of someone

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<sup>26</sup> The Journey Home (2020). Baltimore City Continuum of Care Point-in-Time (PIT) Count Report. Retrieved from <https://journeyhome.wpengine.com/wp-content/uploads/2020/08/2020-PIT-Count-Report-1.pdf>

<sup>27</sup> U.S. Census Bureau. (2019). 2019 American Community Survey 1-Year Estimates Subject Tables.

whose neurodivergence allows them to more deeply focus on certain tasks<sup>28</sup> but might make them less capable at multi-tasking. It is because of this, that definitions of disabilities are often diverse and nebulous across different data sources. In addition, this nebulous definition of disabilities brings into question how the world can be better constructed to not just accommodate individuals with disabilities, but to ensure their unique circumstances become no more determinative of their success and happiness than eye color.



The American Community Survey identifies a disability as anyone who self-identifies with a hearing difficulty, vision difficulty, cognitive difficulty (“serious difficulty concentrating, remembering, or making decisions”), ambulatory difficulty, self-care difficulty (“difficulty dressing or bathing”), or independent living difficulty (“difficulty doing errands alone such as visiting a doctor’s office or

shopping”).<sup>25</sup> It is important to note this means any person with a high-functioning autism or most mental illnesses may not be identified as having a disability. Nonetheless, based on this definition, 14.8% of Baltimoreans younger than 65 and 5.7% of Baltimoreans younger than 18 were identified as having a disability in 2019. The unemployment rate of those with ACS-defined disabilities was 12.3% in 2019, over significantly times higher than Baltimore’s 7.9% overall unemployment rate in the same survey.

It is also important to note how the economic conditions of employment interact with and can reinforce the manifestation of disabilities. For example, a study of state minimum wages from 2006 to 2016 suggests that a one dollar increase in the real minimum wage was associated with a 1.9% decrease in the state’s annual suicide completion rate.<sup>29</sup> Similarly, a 1992 Health and Retirement Study of the U.S. population found that among people ages 51 to 61 whose health limits the amount or kind of work they can do, 26% of women and 45% of men became disabled because of an accident, injury, or illness at work.<sup>30</sup>

<sup>28</sup> Remington AM, Swettenham JG, Lavie N. Lightening the load: perceptual load impairs visual detection in typical adults but not in autism. *J Abnorm Psychol.* 2012 May;121(2):544-51. doi: 10.1037/a0027670. Epub 2012 Mar 19. PMID: 22428792; PMCID: PMC3357114.

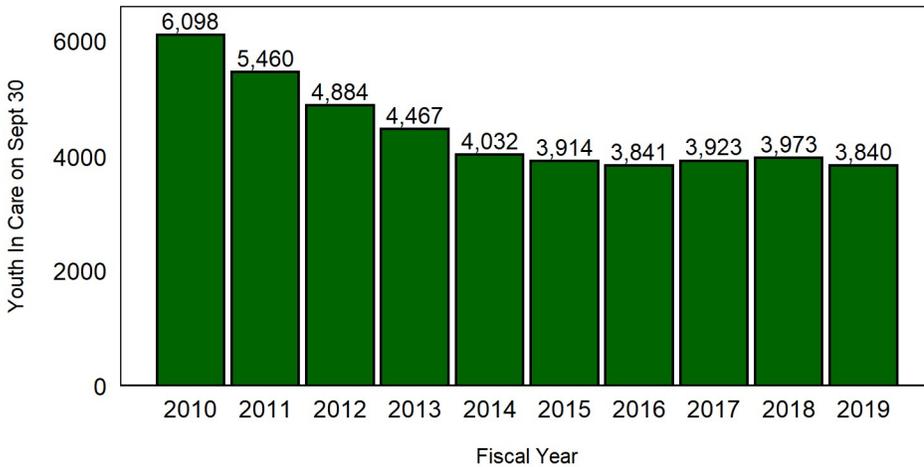
<sup>29</sup> Alex K. Gertner, Jason S. Rotter, Paul R. Shafer, (2019). Association Between State Minimum Wages and Suicide Rates in the U.S., *American Journal of Preventive Medicine*, Volume 56, Issue 5, Pages 648-654, ISSN 0749-3797, <https://doi.org/10.1016/j.amepre.2018.12.008>.

<sup>30</sup> O’Leary, Paul & Boden, Leslie & Seabury, Seth & Ozonoff, Al & Scherer, Ethan. (2012). Workplace injuries and the take-up of Social Security disability benefits. *Social security bulletin.* 72. 1-17.

## Foster Care

### Youth in Foster Care System on September 30

Maryland, FY2010 - FY2019



From 2010 – 2014, the number of youth in Maryland’s foster care system dropped dramatically from 6,098 to 4,032; however, since 2015 the size of the foster care system has remained between 3,800- 4,000. From 2013 – 2015, about 18% of foster youth age out of care compared to 10% nationally with the majority of youth over the age of 14 likely to remain in care until they turn 21.<sup>31</sup> This means that most working age youth in Maryland’s foster care system will have their first workforce experiences in the foster care system. By age 21, only 45% of those

transition-age youth in Maryland’s foster care system were employed full-or-part-time<sup>32</sup> compared to 59% of youth in the Maryland’s general population in the same period.<sup>33</sup> In many other ways, Maryland’s transition-age foster youth were more marginalized than their general population counterparts including graduating high school by 21 (78% vs. 91%) and having insurance coverage (90% vs 77%), while many had histories with the criminal justice system (21%), experienced homelessness (13%), and received substance abuse treatment (11%) between ages 19 and 21.

The size of the foster care system can be impacted by employment, as reasons for taking a youth from their home and placing them into the foster care system can be exacerbated by poverty and unemployment, like inadequate housing or homelessness.

<sup>31</sup> Harburger, D.S. & Greeno, E. J. (2016). Thrive@25 Phase 1: Maryland’s Planning Grant to End and Prevent Homelessness for Youth with Foster Care Histories on the Rural Mid-Shore. (Final Report). Baltimore, MD: The Institute for Innovation & Implementation, University of Maryland School of Social Work.

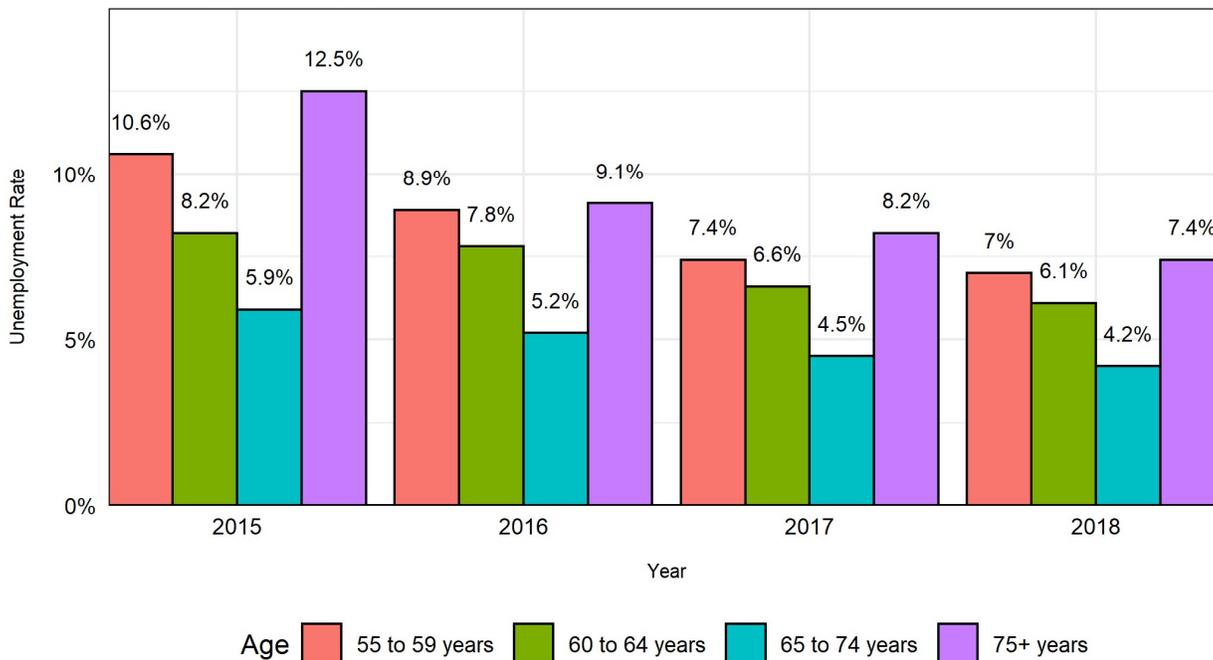
<sup>32</sup> National Youth in Transition Database (NYTD) from federal fiscal year 2015.

<sup>33</sup> U.S. Census Bureau (2015). American Community Survey 5-Year Estimates Subject Tables.

## Workers Ages 55+

### Unemployment Rate by Age

Baltimore City, 2015 - 2018, Ages 55+



In Baltimore City, the unemployment rate generally reduces for increasing age groups; however, this is in large part due to the reduction in labor force participation (which peaks in the 30 to 34-year-old age groups at 82.6%). For the 7.5% of 75+ year-old

Baltimoreans still in the labor force, the unemployment rate rises slightly. Studies generally show that older workers do experience discrimination in the hiring process; however, this discrimination is much more significant for older women than older men.<sup>34</sup>

## Single and Non-Custodial Parents

In Baltimore City, there were 23,628 female householders and 5,018 male householders with minor-aged children and no spouse present in their homes. About 80% of these female heads of households and 93% of these male heads of households were in the labor force.<sup>35</sup>

In Maryland, many non-custodial parents are obligated to pay child support to the custodial parent of their children. In these cases, several barriers in the system exist that make their experiences more difficult; for example, their arrearages can still accrue if they are incarcerated for 180 days or less (previously 1.5 years until 2020).<sup>36</sup> In addition, noncustodial parents who fall behind on two payments can have their driver's licenses and some professional licenses (e.g., barber, nursing assistant, and plumber) revoked, which can make it more difficult to pay arrearages in the first place.<sup>37</sup> According to the Baltimore Sun, "The Census Bureau estimates that even as the child support system lifted 800,000 people across the country out of poverty in 2018, it pushed an additional 300,000 people into destitution."<sup>35</sup> Fortunately, recent changes in laws have required Maryland's Department of Human Services to more closely factor in the capability of noncustodial parents to afford child support arrearages in deciding the amount of those arrearages; however, the full impact of these policies is yet to be seen.<sup>38</sup>

<sup>34</sup> Neumark, David, Ian Burn, and Patrick Button. 2016. "Experimental Age Discrimination Evidence and the Heckman Critique." *American Economic Review*, 106 (5): 303-08.

<sup>35</sup> U.S. Census Bureau (2019). American Community Survey 1-Year Estimates Subject Tables.

<sup>36</sup> MD. Code Ann, State Government § 12-104.1 (2020)

<sup>37</sup> Wenger, Y. (2020, March 5). At what cost? For Baltimore's poorest families, the child support system exacts a heavy price — and it's hurting whole communities. *The Baltimore Sun*. Retrieved from <http://www.baltimoresun.com>

<sup>38</sup> Job Opportunities Task Force (2020). 2020 Policy Priorities – Legislative Wrap Up. Retrieved 11/29/2020 from <https://jotf.org/policy/>

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

The list below includes all major colleges and universities:

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

*Colleges in Baltimore City, from Maryland Eligible Training Providers List*

Baltimore is fortunate to have a strong network of occupational training providers. The list below includes a sample of those providers.

<b>Occupational Training Providers - Baltimore City</b>	
<b>All-State Career</b>	<b>GlobalTech Bilingual Institute</b>
<b>All-State Career Center</b>	<b>Goodwill Industries of the Chesapeake, Inc.</b>
<b>America Works of Maryland, Inc.</b>	<b>GROUP Ministries Baltimore, CDC</b>
<b>Avara's Academy of Hair Design</b>	<b>Health Focus, Inc.</b>
<b>Baltimore Alliance for Careers in Healthcare</b>	<b>Jane Addams Resource Corporation</b>
<b>1199 SEIU League Training</b>	<b>NPower, Inc</b>
<b>Baltimore City Community College</b>	<b>Holistic Massage Training Institute</b>
<b>Baltimore City Joint Apprenticeship Program</b>	<b>International Academy of Hair Design &amp; Technology</b>
<b>Baltimore Educational Enrichment</b>	<b>It Works Learning Center - Manor Care</b>
<b>Baltimore School of Dog Grooming</b>	<b>It Works Learning Center, Inc.</b>
<b>Baltimore Studio of Hair Design</b>	<b>Job Opportunities Task Force</b>
<b>BEAT - Beauty Expert Artistry Training</b>	<b>Johns Hopkins Hospital Schools of Medical Imaging (The)</b>
<b>BioTechnical Institute of Maryland, Inc.</b>	<b>Keller Professional Services, Inc.</b>
<b>Business Interface, LLC</b>	<b>LVI Power, LLC</b>
<b>Caroline Center</b>	<b>Maritime Applied Physics Corporation</b>
<b>Center for Urban Families</b>	<b>Mid-Atlantic Carpenters' Training Centers - Baltimore</b>
<b>Civic Works, Inc.</b>	<b>Moveable Feast</b>
<b>Digit All Systems, Inc.</b>	<b>St. Vincent de Paul of Baltimore, Inc./St. Ambrose Center.</b>
<b>Power52 Energy Institute</b>	<b>TranZed Apprenticeship</b>
<b>GBMC School of Radiography</b>	<b>Urban Alliance</b>

*Occupational training providers in the Baltimore region, taken from Opportunity Collaborative, Train Baltimore website, MD Labor, ETPL, and MHEC approved list*

MOED on behalf of the BWDB has conducted a thorough 2020 Target Industry Analysis changing the agencies targeted industries from their initial inception. The Board accepted the changes in the December 2020 board meeting. The complete analysis can be found on the Baltimore Workforce Development Board and the MOED websites.

The following targeted industries were accepted:

NAICS (3-digit)	Short Description	Industry Size 2019 - Target Jobs	Industry Size 2025 - Target Jobs	Change from 2019 - 2025 Target Jobs	Separations 2019 - 2025 Target Jobs	Openings - Downsizing from 2019 - 2025 - Target Jobs	% of Openings in Target Jobs
901, 902, 903	Government	15,048	14,066	-982	8,672	7,690	19%
541, 551, 561, 562	Professional and Business Services	8,319	8,884	566	6,122	6,688	15%
622	Healthcare: Hospitals	5,752	5,782	30	2,967	2,997	12%
238	Construction: Specialty Trade Contractors	3,457	3,433	-25	2,598	2,573	56%
621	Healthcare: Ambulatory Health Care Services	2,617	2,944	327	1,632	1,959	13%
611	Educational Services	2,170	2,380	210	1,562	1,772	7%

It is relevant to note that, some industries will see a decline in the number of target jobs available in the future, for example, Government (-982 change in industry size), Specialty Trade Contractors (-25 change in industry size); however, the current size of these industries and portion of their jobs that fit the education and income specifications of target jobs are large enough to make them viable careers in the near future.

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 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 several workforce investment areas that participated in a project incorporating basic education skills with technical training for Emergency Medical Technicians. 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 U.S. Department of Labor (DOL) as a result of the civil unrest that occurred in the city in April 2015. The 1B4J model coupled 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 was a model that built on the existing workforce development system and demonstrated that a model that combined hard-skills training with more intensive support can not only result in strong employment outcomes but other benefits for residents and their communities. 1B4J exceeded every outcome target provided by DOL. In fact, Baltimore's initiative served more residents and exceeded its targets by a greater margin than any of the other 6 DOL grantees. In other words, 1B4J served more residents and served them better. Lessons learned from this model have been incorporated into other MOED partnership programs such as the Grads to Career Program.

- **American Rescue Plan Act (ARPA)**

As a result of the Covid19 pandemic, Baltimore City was awarded ARPA funds from both the Maryland Department of Labor and the city of Baltimore to provide services to Baltimore City residents through occupational training, transitional work, and support services including transportation, adult literacy, mental health, and legal services. Building upon the lessons learned from 1B4J, MOED has contracted with occupational training providers to provide training in high-growth industries leading to recognized credentials for adults and partnered with the Baltimore City School system and Baltimore's Promise to provide occupational training to recent high school graduates. Transitional opportunities within Baltimore City government and non-profits assist residents in getting back to work, and YouthWorks, a 5-week summer jobs program, provides opportunities for employment for youth between the ages of 14 and 21.

### Sector Strategies:

- **Bridge to Careers (B2C)**

B2C is a promising practice that 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. Initiated in the Northwest Career Center (NWCC) One-Stop Career Center, 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**

In 2016, the Mayor's Office of Employment Development convened an Executive Roundtable of business leaders with workforce needs in the energy sector. Over the course of two years, a non-joint Registered Industrial Maintenance Mechanic Apprenticeship Program was created as a competency- based model sponsored by the Baltimore City Community College. The BWDB and its Business Engagement Committee intends to convene key business stakeholders and education providers to explore new apprenticeship models in other sectors such as, 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

A myriad of systemic barriers has been outlined in this plan so far, from institutional and systemic racism sexism, and ableism, to access to adequate education, housing, and transportation, to the trauma and stigma wrought by the criminal legal system. Ultimately, undoing these problems is not possible without significant intervention from all levels of government; however, these weaknesses are not immutable laws of civilization, but rather the natural consequence of the misallocated priorities of a society as a whole, that we as an agency have a moral imperative to rebuff and rebalance as much as we can.

Still, insofar as we are working in the present system as it stands, business growth in the region creates some employment opportunities in industries that provide a living wage and do not require a four-year degree. As noted previously, Baltimore has many jobs, but the majority of those jobs are worked by individuals who do not live in the city. Based on data from EMSI, it is estimated that 58% of new jobs created from 2019 – 2025 in MOED's target industries will require less than a bachelor's degree, although only 15% will earn our target wages. However, many of these opportunities require a workforce that have specific occupational skills. At the same time, some opportunities are inaccessible to many until the underlying assumptions that employers may have on what makes someone work-ready are probed as described previously; for example, formal dress codes and expected communication styles. To successfully participate in occupational skills training, jobseekers must possess certain basic skills (i.e. math and reading). While 14% of the adult population (18 and up) does not have a high school diploma, that number is even higher for African Americans and Latinos. 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.

Based on the Maryland Apprenticeship Locator, the number of apprenticeship opportunities has significantly increased over the past two years with 59 opportunities delivered by over 37 companies/trainers in the high demand Healthcare and trades that fit into Specialty Trade Contractors like Carpentry, Cement Mason, Concrete Construction, Concrete Finishers, Construction, Drywall Working, Electrical, HVAC/R, Insulation, Insulation Working, Masonry, Pipefitting, Plumbing, Roofing, Steamfitting, and Wall Covering.

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 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

- Baltimore has many job opportunities that are not currently worked by city residents.
- 14% of projected jobs openings between 2019 – 2025 can provide a living wage and do not 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. We need to continue to develop strategies that help jobseekers matriculate through basic education programs more quickly and to better connect 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

- Continue to develop more apprenticeship programs in Business Services, Manufacturing and Transportation/Logistics
- Build from the best practice of 1B4J that supported a stronger, more connected workforce system that made it easier for residents to access the occupational training and support services they need

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

The 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 – a workforce system that works.”

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

*“In collaboration with all key stakeholders, most importantly business, the Mayor’s Office of Employment Development will build a workforce development system that drives and supports the local economy.”*

A new Mayor, Brandon Scott, was sworn into office in January 2021. Sharing his vision for the city, Mayor Scott released a new comprehensive economic plan, Building an Inclusive, Equitable Economy in Baltimore for the city of Baltimore that focuses on structural changes to the economic layout of Baltimore City and investments in communities that need it most. ([https://fd092488-5802-4076-8a22-5df9716d9174.usrfiles.com/ugd/fd0924\\_c05f04ebdea647b58077b1bbdf251814.pdf](https://fd092488-5802-4076-8a22-5df9716d9174.usrfiles.com/ugd/fd0924_c05f04ebdea647b58077b1bbdf251814.pdf))

“The steps outlined in this policy will be instrumental to building the economic potential of every neighborhood in our city. For far too long, our Black, poor, and historically-redlined neighborhoods have been left out of plans for economic development and unable to access economic opportunity. As Mayor, I will be active in leveraging every tool at our disposal to ensure Baltimore recovers from the devastation wrought by the COVID-19 pandemic stronger and more equitable than before.”

The Mayor’s Office of Employment Development, in collaboration with the Baltimore Workforce Development Board, will play an integral part in the Mayor’s plan to address economic opportunity for both businesses and citizens of Baltimore.

If Baltimore hopes to become an exemplary model of the 21<sup>st</sup> century city, it needs a workforce system that generates and advances new ideas. It must be responsive 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 and comprehensive database that maps all of Baltimore's workforce training programs (public, private, nonprofit) and outcomes 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.

MOED also promotes the State's vision for the Benchmarks for Success:

*Placing people before performance means that Maryland's workforce system is dedicated to focusing its efforts on those who need our assistance the most and improving the lives of Marylanders.*

*Benchmarks of Success* is a leadership tool that reflects a shared vision of excellence among the State's workforce system partners – **five strategic goals** are organized around an overall vision to increase the earning capacity of Marylanders...

- By maximizing access to employment,
- By maximizing access to and use of skills and credentialing
- By maximizing access to and use of life management skills,
- By eliminating barriers to employment through the use of supportive services, and
- By strengthening and enhancing the effectiveness and efficiency of the workforce system.

MOED has made a conscious effort to focus on Economic Justice, defined as “creating an equitable workforce system for all residents -- especially those who have been generationally and structurally disadvantaged – one that is responsive to their needs and ensures viable economic opportunities.”

By focusing on these State and Local visions, MOED, on behalf of the Board, will remain a high performing system meeting or exceeding the performance indicators described in Section 116(b)(2)(A) of WIOA and support Local Area economic growth and economic self- sufficiency.

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

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

- (A) Baltimore’s strategy to carry out the core programs to align resources available to achieve the state’s strategic vision and goals.

The analysis described in Section 2 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 continues to meet with the WIOA core partners (MD Labor, Vocational Rehabilitation, Education, and TANF) and continues 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

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

The table below describes the programs and services offered in the AJC. MOED and workforce partners have developed “Matrixes” that outline the scope of services provided by each partner. Partners utilize these tools to create a common intake process and orientation session to promote coordination and increase integration. The Partners have also created an online [Assistance Request Form](#) monitored by MOED to facilitate referrals among partners as well as for job seekers to request direct assistance. Usage of the referral process has increased system-wide ability to track the outcome of referrals. A customer consent release form is also available in the event it is requested or required by a provider.

MOED has fully implemented use of the Unite Us Referral tool sponsored by Kaiser Permanente and EveryMind and continues to facilitate the onboarding of WIOA Partners onto the network.

This coordinated care network of health and social care providers will allow MOED and partners to refer customers to organizations that will address their needs and the providers will be able to see the results of their referrals. Joining the network is free. More information can be found: <https://maryland.uniteus.com/about/>

In addition, the Assistance Request Form has been integrated with Unite Us and licensed staff are able to take action on the client request within the Unite Us network.

**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: Career Transition Management Corporation  Admission Services  Career Transition Services	A Job Corps admissions representative holds scheduled hours at the Eastside One Stop Career 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.

<p>Title II –Adult Education and Literacy</p>	<p>Baltimore City Community College</p>	<p>Provide assistance in establishing eligibility for programs with financial aid assistance for training and education programs provided under WIOA.</p> <p>Conduct diagnostic testing and use of other assessment tools; CASAS. Facilitate GED and ABE classes in the One-Stops</p> <p>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</p> <p>Provide occupational skills training for in-demand jobs.</p>
	<p>South Baltimore Learning Center</p>	<p>Assessments, advising, and instructional services in adult basic and secondary skills and/or English language skills</p> <p>Cross referral of learners for skills upgrades</p> <p>Workforce Literacy Classes</p>
	<p>Strong City Baltimore</p>	<p>Assessments, advising, and instructional services in adult basic and secondary skills and/or English language skills</p> <p>Cross referral of learners for skills upgrades</p>

	Learning is For Tomorrow (Lift)	LIFT provides quality literacy instruction and life-skills training to adult learners and assist individuals in becoming self-reliant life-long learners; and provides a learning environment which is supportive and incorporate best instructional practices.
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	Maryland State Department of Education, Division of Rehabilitation Services	<p>DORS counselor is assigned to Baltimore City One-Stops for referral to DORS Services if requesting any of the following:</p> <ul style="list-style-type: none"> <li>• an accommodation needed to access the AJC, or</li> <li>• indicates a need for multiple or extensive vocational services, or</li> <li>• Customer receives SSI or SSDI benefits as a result of a disabling condition (qualifies for Ticket to Work).</li> <li>• Is interested in specialize vocational rehabilitation services to assist with employment.</li> </ul>

<p>Senior Community Service Employment Program</p>	<p>State of Maryland Department of Labor</p>	<p>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.</p>
	<p>Center for Workforce Inclusion (national grantee)</p>	<p>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.</p>
<p>Temporary Assistance to Needy Families</p>	<p>State of Maryland, Baltimore City Department of Social Services</p>	<p>Through a partnership with MOED, BCDSS provides workforce development services to TANF recipients. Collaboration and integration of workforce development services aims to increase participation of TANF recipients in WIOA services.</p>

<p>Vocational Education Activities under Carl D. Perkins Career and Technical Act of 2006</p>	<p>Baltimore City Community College</p>	<p>Career and Technology Education (CTE) prepares both youth and adults for a wide range of careers. 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.</p>
<p>Trade Adjustment Assistance</p>	<p>State of Maryland Department of Labor, Licensing and Regulation</p>	<p>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.</p>

Veterans	State of Maryland Department of Labor, Licensing and Regulation - JVSG	Veteran staff 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. Participants of the People Accessing Continued Employment Program (P.A.C.E) will also receive skill assessment and career counseling; resume creation; interviewing techniques; employment retention services; and support services through the Housing Authority of Baltimore City.
Unemployment Compensation	State of Maryland, Department of Labor, Licensing and Regulation	Working in conjunction with the UI Division, DLLR Workforce staff requires 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 ensures 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.

- (C) This section describes how MOED on behalf of the BWDB will work with the entities identified above to expand access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment.<sup>26</sup> It includes 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 to identify workforce needs and the gaps in services that affect target populations, as well as to direct continuous quality improvements in the workforce 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. 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, MOED and One-Stop partners developed a "Service Matrix" that outlines the responsibilities of each partner. These tools are 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. Further, the *Unite Us* data system which tracks referrals between internal and external partners begins to establish MOED and its American Job Centers as Access Points for the city. In future planning meetings the workforce partners will continue its work to align data collection processes, report customers and outcomes into a data warehouse, and develop 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 <del>Peyser</del>	Unemployment	DORS	DLLR/Veterans	TAMF	ROWIRESEA	Job Corps Admissions	Job Corps-CTS	Second Chance	Adult ED BCCC	Strong City	South Baltimore Learning	Learning is for Tomorrow_LIFT	Older Workers	CAP	HABC
Basic Services	Screening Eligibility	✓	✓	✓		✓x		✓x				✓	x	x	x	x	✓	x	x
	Outreach/Intake Orientation	✓x	✓			✓x				✓		✓	x		x	x	✓		
	Informal Initial Assessment	✓	✓	✓		✓x		✓x		✓	✓x	✓	x	x	x	x	✓		
	Labor Exchange Services/LMI	✓	✓	✓							✓x	✓							
	Referrals to programs	✓	✓	✓		✓x		✓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		x	x
	Disability Services	✓				✓x					✓x		x				✓		
	ESOL												x	x					
	Job Fairs	✓	✓	✓				x			✓x	✓			x	x	✓		
	Recruitment	✓	✓	✓		✓x				✓		✓	x	x	x	x	✓		

✓ A/C/One Stop – On-site	x Off-Site at Vendor/Partner	☎ Telephone/Email	E Online/Electronic
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Last updated, May, 2021

The table below -One Stop Career Center Services- identifies the services and delivery of service days/hours for all partners located at each location and is a tool shared among staff only to assist in the referral process.

**One Stop – Career Center Services  
For Staff Use Only**

	Service/Who Benefits	Description	Schedule/One Stop
1	Career Lab Maryland Workforce Exchange (MWE)/ All Job Seekers	Basic Career Services – Provide labor exchange services and information through 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; job search placement assistance; refer and coordinate supportive services and other workforce programs	Daily 8:30 – 4:30 ESCC, NWCC
2	Orientation All Job Seekers	Job seekers learn about services provided and partner agencies in the Baltimore City American Job Centers. The orientation will provide a number of resources which include information on how to access employment and training opportunities	ESCC- One-on-One, Mon - Thurs 8:30 to 12:00  NWCC – Daily 8:30 – 1:00 PM Individual Group Orientation Every Mon & Wed @ 9:30a
3	Job Search Tools/Resources All Job Seekers	Use phone, fax, copier and resource library materials to conduct job search	Daily 8:30 – 4:30 ESCC, NWCC
4	High Tech Lab All Job Seekers	Daily access to self-service computers for internet access and job search	Daily 8:30 – 4:30
5	Business Services Employer Referrals & Placement Assistance Employer Services  All Job Seekers Employers	<ol style="list-style-type: none"> <li>One-on One sessions with Business Services Representative (BSR)</li> <li>Job Club</li> <li>Employer Specific recruitments</li> <li>Employer Services</li> </ol>	<ol style="list-style-type: none"> <li>Tuesday &amp; Thursday - 9:00 – 12:00- NWCC Monday's &amp; Thursday 9:00 – 1:00 ESCC Tuesday's &amp; Wednesday's 1:00 – 3:30 ESCC</li> <li>Wednesday's 11:00 - 1:00 - NWCC</li> <li>As scheduled with BSR staff</li> <li>As scheduled by Business Services Representative</li> </ol>

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

**Baltimore City WIOA Partners  
TRAINING AVAILABILITY 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.	<p>Contact the closest Career Center Network location or online assistance: <a href="https://moed.baltimorecity.gov/assistance-request">https://moed.baltimorecity.gov/assistance-request</a></p> <p>Eastside Career Center 3001 E. Madison St. 410-396-9030</p> <p>Northwest Career Center Mondawmin Mall 410-396-7873</p> <p>Employment Connections Center 1410 Bush Street 410-396-1052</p>	Open to Baltimore City residents approved through the WIOA standard enrollment process	<p>ITA application process with technical assistance provided by case manager:</p> <p>Customers must attend orientation.</p> <p>Customers must meet required eligibility requirements.</p> <p>Customers are assigned a case manager who personally guides them through application process.</p> <p>Customers must complete the Pell Grant application</p> <p>Staff must ensure that customers understand that the approval process takes 45 – 60 days.</p> <p>Applications are approved by supervisors and turned off on by managers.</p>	No cost to participants/ WIOA funds are capped at \$4,000 per customer. Training costs in excess of \$4,000 are reviewed by Asst. Director of Adult Services for approval.	<p>The following vendors are approved*:</p> <p>Allstate BCCC MedCerts</p> <p>*See <a href="#">Maryland Eligible Training Provider List</a> (ETP list) for WIOA Occupational Training Programs complete course listings.</p>

During the spring of 2020 due to Covid-19, the One Stops were closed for in person services and staff/partners fully adapted delivering services remotely. The One Stop – Virtual Career Services table below was created to assist staff in helping customers navigate citywide employment and supportive services online. This table contains live links to access online service and or contact services providers via email/phone. \* **The One-Stop centers re-opened to the public in February 2022 under strict safety protocols and guidance issued by the Baltimore City Health Department and the Centers for Disease Control and Prevention (CDC).**

**One Stop – Virtual Career Center Services  
Telework Contacts-For Staff Use Only**

Service/Who Benefits	Description	Website/Community Resource	Contact for Telework Assistance
Career Lab Maryland Workforce Exchange (MWE)  All Job Seekers	Basic Career Services – Provide labor exchange services and information through 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; job search placement assistance; refer and coordinate supportive services and other workforce programs	<b>Remote Services ONLY</b>  <a href="#">Maryland Workforce Exchange</a> Preferred method of contact Email	Cynthia McClain, <a href="mailto:cynthia.mcclain@maryland.gov">cynthia.mcclain@maryland.gov</a> ESCC - (410) 396-9030 LaMont A. Robinson Sr., <a href="mailto:lamont.robinson@maryland.gov">lamont.robinson@maryland.gov</a> Phone (410)205.9092 Anwar Scott-Oliver, <a href="mailto:Anwar.Scott-Oliver1@maryland.gov">Anwar.Scott-Oliver1@maryland.gov</a> Lachelle Hill, <a href="mailto:Lachelle.hill@maryland.gov">Lachelle.hill@maryland.gov</a> NWCC - (410) 396-7873 Naticia Osbourne, <a href="mailto:Naticia.Osbourne@maryland.gov">Naticia.Osbourne@maryland.gov</a> Tia Thomas, <a href="mailto:Tia.thomas@maryland.gov">Tia.thomas@maryland.gov</a> James Powell <a href="mailto:James.powell@maryland.gov">James.powell@maryland.gov</a>
Orientation  All Job Seekers	Job seekers learn about services provided and partner agencies in the Baltimore City American Job Centers. The orientation will provide a number of resources which include information on how to access employment and training opportunities	<b>Remote Services ONLY</b> <a href="#">One Stop Career Center Orientation Video</a> <a href="#">One on One Remote Services</a>  <a href="#">Digital Resource Complete: Assistance Request Form</a>	Anwar Scott-Oliver, <a href="mailto:Anwar.Scott-Oliver1@maryland.gov">Anwar.Scott-Oliver1@maryland.gov</a>  Kevin Johnson, <a href="mailto:Kevin.johnson1@maryland.gov">Kevin.johnson1@maryland.gov</a>
Job Search Tools/Resources All Job Seekers	Use phone, fax, copier and resource library materials to conduct job search	Digital Assistance: <a href="#">Assistance Request Form</a>	Staff Designated by Program Manager/LEA's
High Tech Lab All Job Seekers	Daily access to self-service computers for internet access and job search	<a href="#">Alison Online Courses</a> <a href="#">GFC Learn Free</a>	<b>Self Service Online Only</b>

(D) MOED, on behalf of the BWDB, has engaged entities identified above in the formulation of its Local Plan.

Baltimore’s Local Board includes a representative of each of the entities described in Section B above. MOED hosted individual discussions with each of the core partners to discuss enhanced integration and alignment of services for Baltimore City residents. The full board reviewed a draft of the Local Plan.

A 30-day comment period occurred in February/ March 2021. Comments/ feedback from the board and received during the public comment period were incorporated into the final version of the Plan.

At the March 2021 board meeting, a final version of the plan was shared, gained final approval from the board, and was signed.

**Revisions to the Local Plan occurred in the first quarter of 2023 and was shared at the March 2023 full board meeting.**

(E) Strategies and services to be used:

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

MOED Employer Services team targets businesses in Baltimore’s high growth industries and meets with company executives and human resource staff to determine workforce challenges and

solutions that will meet both the employers' and jobseekers' needs. These workforce solutions include strategies that enable employers to develop training for targeted new hires that are customized specifically for the occupation. Employer Services team members encourage and market customized /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 also assists 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.

Understanding the role that small businesses play in economic development and job opportunity, MOED uses a targeted business development approach 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. Employer Services staff participate on various committees of these organizations to promote available services and engage businesses in workforce development programs including training, job readiness, curriculum development.

In addition, the Employer 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
- 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 collectively addresses 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 citywide and/or regional basis. This ensures that there is a streamlined process to help job seekers access opportunity and employers locate their skilled workforce. MOED also supports outreach efforts and partners with BDC 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 Maryland Department of labor's 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. The BWDB will ensure jobseekers have a role/voice in the board's decision-making process and in informing the services the city provides.

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

The Board has several built-in mechanisms to ensure that jobseekers have a role and voice in the decision-making process both in terms of the community-based organizations represented and the structure of Board and committee meetings themselves. The Board and MOED have contracted with a local nonprofit organization that will host and facilitate a series of "community conversations" about workforce development. These conversations began in the spring of 2019 and will continue to occur at various locations across the city to ensure that residents have numerous opportunities to provide input and to minimize transportation and other logistical challenges. The objective of the sessions will be to better inform the Board, MOED and other workforce partners about the challenges and services residents need to fulfill their career goals.

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

- EARN Maryland,
- Pre-apprenticeship and Registered Apprenticeship,
- Incumbent worker training programs,
- On-the-job training programs,
- Customized training programs,
- Industry and sector strategies,
- Integrated education and training,
- Career pathways initiatives,

- Utilization of effective business intermediaries, and
- Other business services and strategies.

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 other resources, MOED has been able to engage city residents in high-growth, high-demand training offered by organizations including, but not limited to: Job Opportunities Task Force's (JOTF) Jumpstart for pre-apprenticeship construction trade training; Goodwill Industries for IT, culinary and warehousing; Baltimore Alliance for Careers in Healthcare for jobs in the healthcare industry; Maryland New Direction for maritime transportation and logistics training; Bon Secours and Community Works for training in CNA/GNA; Jane Addams Resource Corporation for training for welding and CNC machinists; and Baltimore City Community College for Emergency Medical Technicians.

### **Apprenticeship**

MOED convened a business roundtable of local energy sector employers which resulted in the Industrial Maintenance Mechanic Apprenticeship Program, the first registered apprenticeship (RA) competency-based model sponsored by the Baltimore City Community College. MOED intends to convene additional key business stakeholders and education providers to explore new apprenticeship models in Information Technology, Hospitality and Tourism and other emerging occupations as the demand is identified. MOED 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 at least 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 \$15 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.

- Employer Services staff reviews proposals on an ongoing 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 \$4,000 per person.
- Training can be employer-based and/or offered by qualified vendors (e.g., OJT or classroom)

## **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- Bridge to Careers (B2C)**

B2C is a promising practice that 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. Initiated in the Northwest Career Center (NWCC) One-Stop Career Center, B2C provides intensive case management services to a cohort of individuals in a four-phase 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.

## **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 was awarded a MDOL competitive grant (CGP) for Local Workforce Areas for a Demonstration Project in Career Pathways and Co-Enrollment of federal Workforce Innovation Opportunity Act Title II students enrolled in Title II adult education to provide access to occupational training services and connect those students to meaningful employment. The Baltimore Accelerating Connections to Employment's Emergency Medical Technician (BACE-EMT) career pathways project targets the booming healthcare sector, specifically, Emergency Medical Technician –Basic training, through a partnership with Strong City Baltimore, South Baltimore Learning Center and the Baltimore City Community College.

MOED will continue to provide technical support for a Career Pathways Demonstration Model entitled Grads 2 Careers which is funded through a local nonprofit organization, Baltimore's Promise. Baltimore's Promise also assists with the administration of the demonstration project. The model seeks to establish a pathway for Baltimore City high school graduates who are not enrolled in four-year colleges or universities into well paying, high-demand and high-growth occupations in the city and region. The initial goal of the program was to fund occupational skills training for 400-500 graduates over two school years (class of 2018 and 2019), in addition to wraparound services like legal assistance and mental health care. The program has been extended through 2021. Participating students are recruited in their senior year of high school to participate in training following graduation. Training areas include healthcare, warehousing, construction, and CNC.

- (H) BWDB will coordinate workforce development activities with economic development activities for the Local Area, and promote entrepreneurial skills training and microenterprise services

MOED's Employer Services division connects businesses to BWDB and promotes Baltimore City's Sourcelink, a resource for small businesses. MOED also serves on the Business Intelligence Dashboard Committee. The committee collaborates with other agencies by analyzing data; and service gaps and finds solutions and additional resources available to small business.

- (I) BWDB 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 Committee, 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.

Supportive services are essential for WIOA youth participants to successfully complete the opportunities offered by selected providers. Pressley Ridge offers counseling services to WIOA youth. They integrate a trauma-informed perspective into all of their services, providing the foundation for a basic understanding of the psychological, neurological, biological, and social impact that trauma has on individuals. Youth in need of temporary housing assistance are referred to YES (Youth Empowered Society) Drop-In Center or the NEST at HEBCAC Youth Opportunity Center. As part of the youth service provider contracts, support services offered by the provider are built into the agreements. Examples include purchase of uniforms and tools, transportation assistance, and acquiring vital documents.

Additionally, MOED has a supportive services policy that provides technology resources and support to youth and adult WIOA participants seeking employment and/or to participate in distance learning and/or occupational skills training.

- (J) The BWDB intends to provide a business voice in the delivery of workforce development activities carried out in the Local Area. The description below includes 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 meet 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 has agreed to use its resources to:

- influence boards and other licensing bodies to reevaluate policies, written in the 1950'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 that 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.

- (K) The BWDB will promote and cultivate industry-led partnerships, such as career pathways, Registered Apprenticeship, 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 its resources to work with existing or new industry sectors including the Hospitality partnerships 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. MOED continues to work with the BWDB as referenced in (G) Industry and Sector Strategies.

(L) 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. Faith-based leaders also serve as members on all community hiring economic development initiatives, such as Harbor Point, Port Covington, and Maryland Stadium Authority Baltimore City Schools Projects.

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.

## Section 4 – American Job Center Delivery System

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

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

### **Two comprehensive American Job Centers (Blue Ops, Inc. is the local One-Stop Operator):**

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  
Mondawmin Mall  
Baltimore, Maryland 21215  
410-396-7873  
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

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

House of Ruth  
2521 N. Charles Street  
Baltimore, MD 21218  
443-569-0487

Enoch Pratt Free Library- Waverly Branch  
400 E. 33<sup>rd</sup> Street  
Baltimore, MD 21218

Our Daily Bread Employment Center  
725 Fallsway 21202  
Baltimore, MD 21202  
667-600-3400

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, work experience and job placement.

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

- (B) The Baltimore City customer flow and process including 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 individual needs. Rather, a Greeter provides the customer with an informal assessment and overview of Career Services and center resources and then connects them to the appropriate service and/or partner.

When a customer enters the AJC and self identifies as a Veteran, the greeter administers the Veteran Services Significant Barriers to Employment Eligibility Checklist screening tool. This tool is an assessment to determine whether the veteran has significant barriers to employment. If eligible, they can choose to meet with the Disabled Veteran Outreach Program (DVOP) specialist for individualized services. If the assessment does not reveal significant barriers, then other AJC staff deliver one-stop 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, partner 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 services 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.

During the COVID-19 pandemic all One-Stop Career Centers are temporarily closed to in-person visits. MOED introduced several innovative approaches to serving Baltimore City residents. Many workforce services were delivered via remotely via telephone, email and virtual formats such as at Delivery.gov, the MOED website and social media platforms. Examples of critical virtual offerings include career counseling and coaching, resume development, referral to occupational skills training, community resources and access to available jobs on the "Now Hiring COVID-19" job board.

The virtual services schedule is as follow:

Weekly session Virtual Sessions on FACEBOOK Live @BaltMOED;

- Job Readiness Sessions on Tuesdays at 1:00 PM;
- Employer Recruitment on Wednesdays at 1:00 PM; and
- Job Club on Thursdays at 1:00 PM

The One-Stop Career centers re-opened to the public in February 2022 under strict safety protocols and guidance issued by the Baltimore City Health Department and the Centers for Disease Control and Prevention (CDC).

Residents also receive assistance with registering in the Maryland Workforce Exchange - an online job bank where applicants can search for and access available jobs, explore labor market information, and check the events calendar for activities related to finding a job or accessing training.

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 we intend to utilize on-demand video relay 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 (CDF) who determines their eligibility for WIOA-funded services and other specialized funded programs. CDF may also conduct comprehensive assessments, career planning, and development of an 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. The CDF will collect the required documents that verify eligibility. Once eligibility has been determined, the customer receives a comprehensive assessment to evaluate skills, aptitude, interest and ability to participate and or complete training program.

### **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 resolved.. 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 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.

CDF's case-manage, 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) The BWDB developed the following process to solicit and select the 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. Initial selection of the One-Stop Operator was conducted through a competitive process led by the Operations Committee of the Local Board. Examples of organizations that were eligible to apply included: 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.

To ensure that there was no conflict of interest or perceived conflict of interest, the BWDB contracted with an independent consultant to facilitate the procurement process. The Operations Committee of the BWDB worked directly with the independent consultant to develop a request for proposal and evaluation tool. No workforce system service provider or potential service provider were involved in the development of the request for proposal or the selection process.

The Baltimore Workforce Development Board (BWDB), in accordance with federal regulations (TEGL 15- 16, 2CFR200 .32(t)), conducted an open competition for selection of the One-Stop Operator and a Request for Proposals (RFP) was released on December 9, 2016 and closed on January 27, 2017. There were three proposals submitted in response to the RFP. On March 17, 2017, based on the recommendation of the BWDB Operations Committee, the BWDB voted to designate the Baltimore Mayor's Office of Employment Development as the One-Stop Operator.

Since MOED is the administrative arm of the BWDB and the BWDB cannot enter into a contract with itself, the BWDB entered into an agreement with MOED to perform the duties of the One-Stop Operator for one year; beginning July 1, 2017 and ending June 30, 2018 (with the option to extend the agreement for one additional year). At the end of the one-year period, the BWDB, based on the recommendation of the Operations Committee, approved that the One-Stop Operator agreement be extended for an additional two-year period—July 1, 2018 through June 30, 2020—and then again for one additional year through June 2021. MOED plans to release an RFP for the One-Stop Operator for the period beginning July 1, 2021.

An RFP was released and there were no respondents for the One-Stop Operator beginning July 1, 2021. MOED was extended for one more year to continue in this role. On February 22, 2022, a second RFP was released and distributed to a wider audience. Several proposals were received and members of the BWDB executive committee rated the proposals and selected Blue OPS Inc as the One-Stop Operator. A contract was executed between Baltimore City Mayor's Office of Employment Development on behalf of the BWDB and Blue OP's Inc. to begin services on 7/1/2022.

- (D) BWDB ensures the continuous improvement of eligible providers of services through the system and ensure that such providers meet the employment needs of local businesses, workers, and jobseekers.

The Baltimore City One-Stop System embraces the concept of a market-driven eligible provider system with a customer-driven consumer reports system. The **Maryland Department of Labor**, oversees the

Maryland's Eligible Training Provider List (ETPL) and reports on program enrollments and performance outcomes for all training providers listed. Customers are educated through consumer reports provided by DWDAL 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. DWDAL will monitor provider's performance on an ongoing basis and poor performers shall be removed from the EPTL. MOED also monitor training providers to ensure students receive a positive learning experience and acquire credentials leading to in-demand skills for in-demand jobs.

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 Contract Specialist approves the funding, a "Welcome to ITA" packet is issued to the customer that 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 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.

(E) MOED, on behalf of the BWDB, facilitates access to services provided through the American Job Center delivery system through the use of technology and through other means.

All AJCs and satellite centers are conveniently located and accessible via public transportation. The Maryland Workforce Exchange (MWE) and MOED website provide virtual links to employment opportunities, labor market information, and a ready pool of job seekers. MOED posts and 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 on social media, during outreach and other community fairs and events.

In partnership with developers, MOED's Employer 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 conducts monthly job readiness workshops at the Enoch Pratt library to inform and prepare residents with the services to obtain employment.

MOED also offers services at six “Community Job Hubs” (CJH) within high-poverty, low-income neighborhoods where the residents live. MOED CJHs increase access to employment opportunities, computer literacy, labor market information, web-based learning tools, exposure to online application processes, and access to training opportunities available at the One-Stops. Through ARPA funds, MOED has hired three mobile career navigators to travel to locations and community events across the city and to provide residents with workforce services in their own communities.

Through the use of technology, MOED 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:

- Title II adult education partners provide educational skills training.
- Life skills training is provided online with Casey Lifeskills online.

- Job readiness training is provided with the 21<sup>st</sup> Century Job Readiness Online Training and includes a post assessment and certification of completion which is available through the MOED website.
- The Maryland Workforce Exchange offers a variety of assessments 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 identifies 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 (e.g., testing standards, frequency, documentation, etc.).

(F) A description of the roles and resource contributions of the American Job Center partners.

The MOED expects that One-Stop Partners will comply with WIOA 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 Career Centers and any other appropriate locations, (3) 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 Career Centers, (4) enter into a Memoranda of Understanding and Resource Sharing Agreement with the local board relating to the operation of the One-Stop system, and (5) 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.

**Partners**

The One-Stop Partners and representative for each are:

- 1) Programs authorized under Adult Program, Title I of the Workforce Innovation and Opportunity Act (WIOA) for Adults, Dislocated Workers and Youth  
Mayor's Office of Employment Development  
Jason Perkins-Cohen, Director
- 2) Programs Authorized under WIOA Title I Youth - Job Corps Maryland CTS  
Management and Training Corporation  
Jeffrey Burton, Vice President

- 3) Programs authorized under Title I, WIOA  
Youth Build Civic Works, Inc.  
Dion Wright, Deputy Executive Director
- 4) Wagner-Peyser Act Programs –  
WIOA Title III,  
Maryland Department of Labor  
**Portia Wu, Secretary**
- 5) Programs authorized under Vocational Rehabilitation - WIOA Title IV Maryland State  
Department of Education Division of Rehabilitative Services  
Suzanne R. Page, Assistant State Superintendent
- 6) Activities authorized under Title V of the Older American's Act of 1965 Maryland  
Department of Labor  
**Portia Wu, Secretary**  
  
Senior Service America, Inc.  
Chris Garland, National SCSEP Director and Gwen Haney, Program Officer
- 7) Career Technical Education programs at the postsecondary level authorized under the Carl D. Perkins  
Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.)  
Maryland State Department of Education  
Suzanne R. Page, Assistant State Superintendent  
  
Assistant State Superintendent  
Baltimore City Community College  
Debra L. McCurdy, President
- 8) Activities authorized under Chapter 2 of Title II of the Trade Act of 1974, Trade Adjustment Assistance  
for Workers Program  
Maryland Department of Labor  
**Portia Wu, Secretary**
- 9) Veterans' activities authorized under Chapter 41 of Title 38 United States Code, Jobs for Veterans  
State Grant Program (JVSG)  
Maryland Department of Labor  
**Portia Wu, Secretary**
- 10) Community Services Block Grant Act (42 U.S.C. 9901 et seq) employment and training activities,  
Mayor's Office of Children and Family Success, Community Action Partners  
Debra Y. Brooks, Director
- 11) Employment and Training Activities carried out by the Department of Housing and Urban  
Development, Housing Authority of Baltimore City  
Janet Abrahams, Executive Director
- 12) Programs authorized under State Unemployment Compensation Laws Maryland  
Department of Labor, Unemployment Insurance  
**Portia Wu, Secretary**

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

Baltimore City Community College  
Debra L. McCurdy, President

Strong City Baltimore  
Karen Stokes, CEO

South Baltimore Learning Center  
Sid Wilson, Executive Director

- 14) Programs authorized under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.) Temporary Assistance for Needy Families Program, State of Maryland, Department of Human Resources, Baltimore City Department of Social Services  
Brandi Stocksdales, Director

- 15) Programs authorized through Section 212 grants of the Second Chance Act of 2007 under the Re-Integration of Ex-Offenders Program

Structured Employment and Economic Development Corporation (Seedco), along with Bon Secours Community Works West Baltimore Career Pathways Collaborative (CPC)  
Tara Colton, Executive Director

Civic Works  
Dion Wright, Deputy Executive Director

Volunteers of America  
Russell Snyder, CEO

Living Classroom  
Cheryl Riviere, Managing Director of Workforce Development

Goodwill Industries of Chesapeake, Inc  
Ryan Smith, Vice President

#### Other Partners

CASH Campaign -  
Robin McKinney, CEO

Maryland Educational Opportunity Center (MEOC)  
Ellen D. Howard, Executive Director

Child Support Administration- Department of Human Services, DHS-CSEA  
Kevin Guistwite, Director of Workforce Development Family Investment Administration

Lutheran Immigrant and Refugee Services (LIRS)  
Megan Bracy, Director for Refugee & Migrant Services Director

(G) MOED on behalf of the BWDB will use Individualized Training Accounts based on high-demand, difficult to fill positions identified within local priority industries identified in Section 1(A) as described below.

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 individuals who seek training services, are determined as WIOA eligible, may, in consultation 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 staffs 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 issued 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 additional training. Exceptions may be considered 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.

(H) Described below is how MOED, on behalf of the BWDB, will provide priority of service that conforms to the State Plan. This also includes 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's priority of services policy is 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 (125% 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**. 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/or 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) An individual who 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**

(c) 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**

(d) 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 etseq.)).
- K. Single parents (including single pregnant women).
- L. Long-term unemployed individuals defined as a participant has been unemployed for 27 or more consecutive weeks at program entry.
- M. 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.

**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 Regulation 20.C.F.R. Part 1010, Priority of Service for Covered Persons, Veterans’ Employment and Training Service. 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 or other veterans’ documentation.

**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 (125% 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.

- (I) Described below is how MOED, on behalf of the BWDB, will utilize funding to create incumbent worker training opportunities.

Incumbent worker training is a new opportunity presented with WIOA, and Baltimore City intends, based on availability of funds, 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 500 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.

- (J) Described below is how MOED on behalf of the BWDB 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 MD Labor Policy Issuances or local guidance documents, and implementation changes as final WIOA guidance is released. Training for special populations served within the AJC providing assistance to individuals with disabilities through Diversity Partners and DORS for Assistive Technology. MOED schedules and/or coordinates a monthly staff meeting that includes training for staff and partners.

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

## Section 5 – Title I – Adult, Youth, and Dislocated Worker Functions

This Section includes –

(A) MOED, on behalf of the BWDB, plans to provide adult and dislocated worker employment and training activities within the local area as follows:

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 subscribe 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.

MOED endeavors to deliver customer-focused Career Services that enable job seekers access to the services they need to acquire the 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.

As described in the Department of Labor’s Training and Employment Guidance Letter (TEGL) 19-16, there are three types of career services: basic career services, individualized career services, and follow-up services. The provision of individualized career services is based on the employment needs of the jobseeker, as determined jointly by the jobseeker and the Career Development Facilitator, and may be identified through an individual employment plan (IEP). These services can be provided in any order which provides staff the flexibility to target services to meet the needs of the customer.

## **Basic Career Services**

Jobseekers 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, and 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 jobseekers 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 jobseekers monthly and document all progress in the Maryland Workforce Exchange (MWE), and record 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) MOED on behalf of the BWDB 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, MD Department of Labor Dislocation Services Unit, and MOED One-Stop staff. The team works with employers and employee representative(s) to reduce the disruptions to businesses, affected workers, and communities that are impacted by job loss. 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.

Layoff Aversion consists of strategies and activities to prevent or minimize the duration of unemployment resulting from layoffs. As applicable, layoff aversion activities may include:

- Immediate and on-site contact to determine assessment of layoff plans, reemployment prospects for workers, available resources, and possibility of trade impact;
- Short-term compensation;
- Employee skill upgrading and customized training;
- Provision of information and access to unemployment compensation benefits and program;
- Information sessions on the trade program;
- Information on Pell Grants and the GI Bill;
- Interviewing skills & resume workshops;
- Job fairs and targeted hiring events,
- Providing on the job training assistance;

- Connecting businesses with workers;
- Working with Economic Development to learn of potential businesses coming to the area with hiring needs; and
- Working with employers on proactive measures such as succession planning or opportunities of potential economic and work transition or expanding of business.

**Rapid Response Contacts**

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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 development activities.

MOED’s Youth Services Division provides a menu of workforce development activities for youth 16-24 years of age. In-school programs will serve youth attending traditional or alternative high school programs beginning at age 16 through age 21. Md. Code, Educ. § 7-301, known as the Maryland Compulsory Education law, dictates that individuals must attend school through the age of 18. Thus, while WIOA dictates that OSY must be between the ages of 16-24 at the time of enrollment, in Maryland out of school youth must be between the ages of 18-24 since they are required to attend school at ages 16 and 17. There are exceptions outlined in the Maryland Compulsory Attendance Law for those individuals between the ages of 16 and 17 who may qualify as an OSY including a youth who has obtained a Maryland High School diploma, equivalent out of state high school diploma, or GED; married; or is in the military. The complete list of exceptions can be found in the Department of Labor Policy Issuance entitled Workforce Innovation and Opportunity Act (WIOA) Title I Youth Program.

Youth are eligible for job readiness training, occupational skills training, internships, job shadowing, 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/CASAS, 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. All WIOA youth providers began using level 11/12 of the TABE on July 1, 2019 as directed per MD Labor Policy Issuance 2020- 05: Basic Education Skills and English Language Assessments.

The WIOA youth providers give youth the choice of several occupational interests. In-school providers include Elev8, Urban Alliance, and Young Professionals. Out of school include America Works, Bon Secours Community Works, Catholic Charities Level Up, Civic Works/ YouthBuild, Healthcare Careers Alliance (Lifebridge Health), National Center on Institutions Alternatives-NCIA. Aptitude tests 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 partnership with DORS which 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) The BWDB will coordinate education and workforce development activities 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 coordinate sector strategies 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.

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.

This allows Title I and Title II programs to coordinate in the development of career pathways and to co-enroll participants so they receive the full spectrum of services for their education and employment needs. For example, an individual could receive adult education services while at the same time receiving occupational skills training funded by Title I.

MOED, in collaboration with South Baltimore Learning Center (SBLC), Strong City, and Baltimore City Community College implemented an Integrated Education and Training model called Baltimore Accelerating Connections to Employment's Emergency Medical Technician (BACE-EMT). This project promotes and supports Career Pathways as a method through which students enrolled in Title II - Adult Education can concurrently gain skills, credentials and upward mobility in the healthcare sector.

To avoid duplication of services, WIOA partners created a “Service Matrix,” as seen on page 38, that outlines One-Stop services and responsibilities of each partner. WIOA Partners are cross-trained on One-Stop services to increase referrals, alignment and prevent duplication of workforce and educational services.

- (E) MOED, on behalf of the BWDB, will coordinate workforce development activities 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 provide supportive services or referral to resources provided by partner agencies to remedy barriers that might impede a customer’s ability to participate in career services. 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, childcare support services, substance abuse treatment, temporary housing, emergency food, **financial literacy, legal services, mental health services** and other necessary supportive services. Fundamental to providing intensive employment and training services is the ability to assist customers with referrals to supportive services. MOED has **fully implemented** a tool called “Unite Us” to facilitate an efficient referral process to support services and resources. The AJC staff regularly mobilizes referral resources to address challenges that may inhibit a customer’s ability to obtain and retain employment. Staff is 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. **Through ARPA funding, MOED is able to provide 40 Lyft rides to Baltimore City residents who are newly employed and working in Baltimore City.**
- **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) MOED on behalf of the BWDB will utilize Local Adult Funding, based on adult priority groups 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.

<b>*Target Populations: Individuals with Barriers to Employment</b>
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 <sup>4</sup>
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 is given in the following order further defined above in Section 4H:

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

(G) MOED on behalf of the BWDB will utilize Local Dislocated Worker Funding as described below:

Dislocated worker funds are utilized to provide services to individuals who lost their job due to plant closures, company downsizing, or some other significant change in market conditions. In most cases, eligible workers that are unlikely to return to their previous occupations, and are eligible for or have exhausted unemployment compensation, are eligible for dislocated worker funds. 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) MOED, on behalf of the BWDB, defines “self-sufficiency” for employed Adult and employed Dislocated Worker participants as:

An annual wage greater than or equal to 125% 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) MOED, on behalf of the BWDB, defines “unlikely to return to previous industry or occupation” when required for eligibility for Dislocated Worker services 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 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) Described below is how MOED on behalf of the BWDB will interpret and document eligibility criteria for in-school youth who “require 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 criterion will remain in effect for in-school youth 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)
- 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 ZIP code 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) Described below is how MOED on behalf of the BWDB will interpret and document eligibility criteria for out-of-school youth who “require 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).

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 criterion will remain in effect for out of school youth 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
- reside in high crime and or poverty area based on ZIP code 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

(L) Described below is how MOED, on behalf of the BWDB, with document and 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 (IEP for adults) and Individual Service Strategy (ISS for WIOA youth).**

**The IEP/ISS is an ongoing strategy jointly developed by the customer and the Career Development Facilitator (CDF, or case manager) 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’s local policy - **Policy Directive 2015-1: Individual Employment Plans** – outlines 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 upgrade 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.

(M) MOED, on behalf of the BWDB, will provide the 14 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.

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
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 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. Automotive Service Excellence (ASE)
  - b. Certified Nursing Assistant/Geriatric Nursing Assistant (CNA/GNA)
  - c. Childcare
  - d. 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
  - e. Forklift/Warehouse
  - f. Heating, Ventilation, Air Conditioning (HVAC)

- g. Home Builders Institute (HBI)
  - h. Information Technology
  - i. Pre-Apprenticeship Carpentry Certification Training (PACT)
  - j. Professional Administrative Certification of Excellence (PACE)
  - k. Retail Services (Customer Service and Sales 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
    - g. Legal services
  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 (American Job Centers)
    - c. Case Management
  11. Referrals for mental health, substance abuse)-
  12. Financial literacy education;
    - a. Partnerships with area financial institutions and credit unions
  13. 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.

14. 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
15. Activities that help youth prepare for and transition to post-secondary education and training.

(N) MOED, on behalf of the BWDB, will 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 begin. For programs that do not provide stipends, the summer employment serves as an incentive for participants while they work.

During quarterly reviews, the Youth Committee 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.

(O) MOED on behalf of the BWDB plan to serve 75%+ out of school youth and plan to meet this new goal.

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. Six providers were selected through the RFP process to specifically serve out of school youth and three programs were selected to serve in school youth. A youth Career Navigator makes weekly visits to various MOED American Job Centers to meet with out of school youth and provide program referrals.

A new feature of this round of WIOA funding is that out-of-school providers are required to reserve at least 40 percent of their WIOA-funded seats for new high school graduates. This targeted use of WIOA funds will support the continuation of Grads2Careers (G2C), a collaborative demonstration model that is now entering its third year of implementation. A partnership of Baltimore City Public Schools (City Schools), MOED, and the nonprofit Baltimore's Promise, the initiative establishes pathways for recent high school graduates who are not intending to enter college full-time within the next year. Its goals are both individual and systemic. It aims to prevent youth from becoming disconnected in the first place, route young people into training for career-track jobs in growing industries, and create a permanent and seamless link between City Schools and Baltimore's workforce system.

(P) MOED, on behalf of the BWDB, will provide basic and individualized career services to customers. Described below is how individualized career services will be coordinated across program/partners in the American Job Centers, including Vocational Rehabilitation, Temporary Assistance for Needy Families (TANF), Community Action Agencies, and Adult Education and Literacy activities to prevent duplication and improve services to customers.

The MOED and One-Stop partners developed a “Service Matrix” to coordinate and align services across programs in the AJCs, including DORS, TANF, CAP and Adult Literacy, with the intent of increasing access for individuals. This Service Matrix helps partners understand the services that each partner agency provides and prevents duplication as well as increase referrals to services.

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, which is comprised of One-Stop Partners. The “Service Matrix” will help AJC staff coordinate and integrate services by functions rather than specific programs and improve communication, capacity building, and cross trainings. Service integration will focus on serving all customers seamlessly, 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) MOED, on behalf of the BWDB, has a written follow-up service policy. This policy includes follow-up requirements, frequency of contact, and required documentation.

In accordance with the Department of Labor, Employment Training administration, TRAINING AND EMPLOYMENT GUIDANCE LETTER WIOA NO. 19-16 OPERATING GUIDANCE for the WORKFORCE INNOVATION AND OPPORTUNITY ACT (referred to as WIOA or the Opportunity Act) as stated in Paragraph 4: There are three types of “career services”: Basic Career Services, Individualized Career Services, and **Follow-up Services**.

The MOED implemented its local Follow-Up Services Policy Number: 2016-2 to provide guidance to the Career Centers on providing follow up services under the Adult and Dislocated Worker programs under WIOA Title I, and individuals served by Wagner-Peyser, as amended by WIOA Title III, beginning July 1, 2015, specifically related to Follow-up after employment placement. Additionally, the Follow-up Service Unit (FSU) is responsible to re-engage customers that have not exited and are not able to be contacted.

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 (through partner referrals and/or internal staff)

- 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 listed above.

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 6 – Title II – Adult Education and Family Literacy Functions

This Section should include –

(A) MOED on behalf of the BWDB 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 includes a discussion of how the 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 BWDB will submit documentation (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 Maryland Department of Labor, 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 (MDOL) 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 MD Labor in reviewing RFP proposals for Title II funds.

Recognizing the importance of supporting Baltimore City’s adult learners in increasing their earning capacity, the Mayor’s Office of Employment Development (MOED) and partners, South Baltimore Learning Center, Strong City and Baltimore City Community College responded to a Competitive Grant Proposal, Career Pathway Connections for Adult Learners initiative released in October 2017. In 2018, MDOL awarded the Career Pathway Connections for Adult Learners grant to Baltimore City. The Baltimore City implemented its Baltimore Accelerating Connections to Employment’s Emergency Medical Technician (BACE-EMT) Project career pathways model through which Adult learners can gain skills, credentials and upward mobility in the healthcare sector. The BACE-EMT project uses an Integrated Basic Education and Skills Training model of service delivery. MOED and partners South

Baltimore Learning Center (SBLC), Strong City, and Baltimore City Community College are recruiting students who are currently enrolled, or have recently completed their education, in Title II funded programs, and are interested in careers as EMTs. Our goal is to enroll forty (40) Title II adult education students into occupational skills training to acquire the skills and credentials necessary to secure employment as Emergency Medical Technicians. As of the writing of this plan, 24 individuals have been enrolled. The COVID-19 Pandemic put training on hold during the Spring and Summer of 2020. A request for a grant extension has been written by MOED to MD Labor.

(B) MOED on behalf of the BWDB 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. Using the Service Matrix as a tool helps partners understand the services that each partner agency provides and streamline referrals. A referral mechanism and consent form were 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 are trained in administering the common assessments utilized by Title II providers.

Adult Provider	Services
Baltimore City Community College	<ul style="list-style-type: none"> <li>• provide GED and adult basic education classes at the One-Stop Career Center</li> <li>• provide students with information on nontraditional career opportunities</li> <li>• provide students with information on adult apprenticeship programs</li> <li>• provide students with information about One-Stop training opportunities and referrals</li> <li>• assist students to attain a secondary school diploma or its recognized equivalent and at least 1 recognized postsecondary credential; and</li> <li>• offer courses to for students for occupational skills training</li> </ul>
South Baltimore Learning Center	<ul style="list-style-type: none"> <li>• provide GED and adult basic education classes</li> <li>• provide information to students on nontraditional career opportunities</li> <li>• provide students with information on adult apprenticeship programs and refer to One-Stop</li> <li>• information on special events focusing on career exploration</li> <li>• provide information about One-Stop training opportunities and refer to the center’s point of contact</li> </ul>
Strong City Baltimore – The Adult Learning Center	<ul style="list-style-type: none"> <li>• provide Adult Basic Education (ABE) and English Language Acquisition (ELA)</li> <li>• Set up a kiosk with information on training opportunities and events from partner organizations</li> <li>• refer individuals to American Job Centers that express interest in MOED services</li> <li>• designate a point of contact to schedule and track cross referrals</li> </ul>

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 continue its effort to develop 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.

MOED and the Adult Education providers created the following mapping tool: [Baltimore City Adult Education Providers](https://www.google.com/maps/d/viewer?mid=1WHsJsZa29YfiNOSkaDKgE_spzBE&ll=39.296387124817194%2C-76.61815555000004&z=12) ([https://www.google.com/maps/d/viewer?mid=1WHsJsZa29YfiNOSkaDKgE\\_spzBE&ll=39.296387124817194%2C-76.61815555000004&z=12](https://www.google.com/maps/d/viewer?mid=1WHsJsZa29YfiNOSkaDKgE_spzBE&ll=39.296387124817194%2C-76.61815555000004&z=12))

The MOED will meet quarterly with local Adult Education Literacy providers 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 Title II providers, developed and implemented the Baltimore City WIOA Partners – Voluntary Consent Form – (Attachment A7 within the WIOA MOU) which authorizes the release of information to include assessment scores among 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, 2017, Local Areas and WIOA Title II Adult Education Service Providers selected assessments from a recommended list. MOED and its Adult Education providers selected to be:

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

In an effort to reduce over-assessment of shared participants, to increase efficiencies, and to improve the overall WIOA customer experience, MOED and its Adult Partner in accordance with the Baltimore City WIOA MOU for the 2016-2020 will share test results and coordinate the use of assessments and as indicated below.

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 MD Labor POLICY ISSUANCE 2020- 05: Basic Education Skills and English Language Assessments:

### **TRAINING FOR ADMINISTERING ASSESSMENTS**

MD Labor 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 Specialists and designated workforce staff who will then deliver administration and interpretation procedures for all approved assessments to local programs. Exception: All BEST Plus 2.0 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.

### Staff Training Schedule

WHO	BY WHOM	WHEN	
		Initial	Update
State Trainers	CASAS, TABE or BEST	Upon hire	Every two years
WIOA Title II Intake/Assessment	State Trainer & Online IIT	Upon hire	Every two years
WIOA Title II Instructional Specialists	State Trainer & Online IIT	Upon hire	Every two years
WIOA Title II ELA Lead Teachers	State Trainer & Online IIT	Upon hire	Every two years
WIOA Title II Local Program Staff	CASAS Online IIT, Intake/Assessment Specialist, Instructional Specialist and/or ELA Lead Teacher	Upon hire	Every two years
WIOA Title I Local Program Staff	CASAS Online IIT or Intake/Assessment Specialist, Instructional Specialist and/or ELA Lead Teacher from a Title II program	Prior to delivering assessments	Every two years

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 adult education staff will enter state training data and local WIOA Title II program staff will enter local program training data in the staff person's LACES personnel record. WIOA Title I providers must be prepared to share training data on staff upon MD Labor or USDOL request.

The MOED in coordination with local Title II providers will plan ongoing staff development training sessions to include utilizing assessments resources and guides applicable to assessments used. Partners will also monitor the test developers' websites to keep up to date with postings of any changes, information about new tests in development, and other resources.

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

The One-Stop operator 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) 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 AJCs 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.

(E) Adult education providers will use the Integrated English Literacy and Civics Education (IELCE) program under section 243(a) of WIOA to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

Baltimore City Community College (BCCC) is the largest provider of Title II Adult Education programming in Baltimore City. Each year, the college provides Adult Basic Education (ABE) and English as a Second Language (ESL) classes for more than 3,000 enrollees. The college also offers the Integrated English Literacy and Civics Education (IELCE) program under section 243(a) of WIOA to prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency.

BCCC pairs each IELCE program with an Integrated Education and Training (IET) program so ESL students have the academic and workplace readiness skills needed for success in occupational training programs. Three (3) IELCE/IET programs are offered by BCCC, in the following in-demand occupations in Baltimore:

1. Certified Nursing Assistant
2. Certified Pharmacy Technician
3. Certified Warehouse Logistics Associate

## Section 7 – Title III – Wagner-Peyser Functions

This Section should include –

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

While teleworking during the COVID-19 pandemic, all AJC staff continue to strategize and strive to provide quality services using virtual tools to communicate with customers such as emailing, google meets, Webex, MWE and other internet virtual programs. Management and frontline staff meet weekly to discuss optimal ways to serve customers and ensure an efficient and effective process to provide individualized services.

- (B) MOED on behalf of the BWDB will ensure that migrant and seasonal farm workers in its Local Area will be provided employment services.

Migrant and seasonal farm workers are typically not served by Baltimore City. In the event a migrant or seasonal farm worker seeks services in Baltimore City, MOED stands ready to provide training services consistent with the requirements per the State policy.

Baltimore City will fully engage Maryland's MSFW population to reach those who can benefit from WIOA services; • Assist in helping MSFWs to transition to stable employment opportunities that pay a sustainable wage, in either agricultural or non-agricultural occupations, based on the individual's career interests; • Integrate the full spectrum of MSFW service providers into the American Job Center (AJC) system; and, • Develop linkages and collaborative efforts with other non-traditional service providers to enhance opportunities for MSFWs to benefit from training and education resources.

(C) Working with our Wagner Peyser partners, below is a description of who is responsible for conducting migrant and seasonal farmworker housing inspections:

Outreach workers must conduct pre-occupancy housing inspections or work with partner agencies to insure pre-occupancy housing inspections are completed, as required by 20 CFR §653.501(3)(b).

If needed, the Rural Services Coordinator may conduct MSFW housing inspections, but must bill time correctly to the MSFW program. Regardless of which party conducts the pre-occupancy housing inspections, they MUST follow ETA requirements described in 20 CFR §654 Subpart E, found at [www.gpo.gov/fdsys/pkg/CFR-2003-title20-vol3/pdf/CFR-2003-title20-vol3-part654-subpartE.pdf](http://www.gpo.gov/fdsys/pkg/CFR-2003-title20-vol3/pdf/CFR-2003-title20-vol3-part654-subpartE.pdf).

MDOL will conduct ONE pre-occupancy housing inspection per season, per employer, for agricultural workers who were recruited through an inter-or intra-state job order, including both MSFWs and H-2A workers. For example, if an agricultural employer initially hires MSFWs through inter or intra-state job orders, MDOL will conduct a pre-occupancy housing inspection for those workers. If, during the same season, that employer also hires H-2A workers, the results of the pre-occupancy housing inspection conducted for the MSFW will be applied.

## Section 8 – Title IV – Vocational Rehabilitation Functions

This Section should include –

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

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

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

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

As with all individuals, whether they have a disability or not, who access the AJC, the customer will use VOS Greeter to select the services they feel they need. In addition, the goal is to ensure that all information and services are accessible, regardless of the individual’s disability. DORS will provide training to the workforce partners in such areas as: programmatic and physical accessibility, serving individuals with disabilities that require support services, disability etiquette and sensitivity training, assistive technology.

The AJC employs a triage service delivery model. This model is designed to ensure customers are not forced into a prescribed set of processes that may not meet their needs.

When a customer enters the center and self identifies as having a disability, AJC staff will inquire if special accommodations are needed to access services. The One-Stop's comply with the A.D.A. by promoting inclusion, choice, and accessibility and ensure that job seekers with disabilities have access to all resources/services. If special accommodations are not needed the customer engages in services. The customer will be referred to DORS if requesting any of the following:

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

The resources offered at the One-Stop are:

- A Vocational Rehabilitation Specialist/Counselor is 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
- Screen reader applications
- Motorized Adj. Table (48"x30")
- Large Print keyboard
- Microsoft Narrator
- NVDA Magnification applications
- Microsoft Magnifier
- Freedom Scientific's MAGic Screen Magnification with Speech Mouse
- Motorized Adj. Table (48"x30")

- Lg Print keyboard
- Trackball
- Multi-Function LaserJet Printer
- Headphones (noise canceling)

DORS will conduct on-going staff development training (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 9 – Temporary Assistance for Needy Families Functions

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

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

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

This Section should include –

- (A) MOED on behalf of the BWDB has integrated TANF into the AJC system (e.g., customer intake, service coordination, client monitoring and tracking, targeting employment services to low-skill, low-wage workers, etc.).

The Baltimore City Department of Social Services (BCDSS) is a required partner in the American Job Center. The TANF staff is integrated in the One-Stop to provide information on services and assists with screening customers for benefits two days a week. TANF participants have access to a broad range of One-Stop services that include partner services, career counseling, occupational skills training opportunities and job placement services.

As referenced throughout this Plan, the WIOA partners including TANF agreed to a common intake that includes an informal assessment and orientation session, Maryland Workforce Exchange registration and referral to career services. In addition, TANF staff participates in orientation/information sessions, coordination meetings to facilitate co-enrollments, career pathway strategies, supportive services, and staff development training.

- (B) A description of the implementation and coordination process to enhance the provision of services to individuals on TANF:

To ensure coordination of services, the MOED and workforce partners developed a One Stop Career Center services matrix that outlines the services provided by each partners 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. The MOED intends to implement a tool called "Unite Us" to facilitate an efficient referral process. In addition, TANF staff participate in orientation/information sessions as well as coordination meetings to facilitate co-enrollment into occupational skills training or other partner services. TANF staff also participate in center staff meetings or staff development training.

- Potential co-location of LDSS and/or WIOA Partners at American Job Centers or LDSS depending on the nature of local partnerships and operations;
  - BCDSS is co-located at the Northeast Career Center 3 days per week (M,W,F) and 2 days per week (Tues & Thurs) at the Eastside Career Center.
- 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;
  - Through the Resource Sharing Agreement TANF contributes funds towards the infrastructure costs of the One-Stop Career Centers and leverage services and resources provided by other partners.
- Cross train and provide technical assistance to all WIOA Partners about TANF;
  - TANF staff will cross train WIOA partners about TANF programs, eligibility criteria, and available support services and provide technical assistance. TANF staff also attend WIOA partners and center staff meetings and receive training on One-Stop customer flow, service delivery, and partner referrals.
- Access to business services and employer initiatives to attract and better serve employers by marketing joint services, minimizing the burden on employers who use the centers, and provide employer-focused services through a single point of entry rather than through all partnering programs; and
  - TANF staff collaborates with the center's staff on training/employer events and job development initiatives to align and maximize efforts.
- Contribute and provide baseline outcomes data to the WIOA system through strategies for collecting and reporting varied program reporting requirements.
  - MOED and TANF will ensure countable activities are tracked for performance metrics; and will collect and share participant job placement information.
  - Where possible, TANF participants receiving AJC services will be co-enrolled into WIOA. These activities and services will be tracked in WORKS by the out-stationed TANF Representative to achieve Work Participation Rate (WPR).

#### Existing Coordination of Services

Even prior to the enactment of WIOA and implementation of the combined local plan, a history of collaboration 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. BCDSS partners with MOED to help provide summer jobs for youth every summer.
- d. MOED-EC refers TANF customers to Baltimore City Community College (BCCC) for GED and pre-GED to help prepare them for the GED test.
- e. Data sharing: MOED-EC has access to the Maryland DHS WORKS program database.
- f. BCDSS 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.

Baltimore City plans to continue to expand upon this existing partnership:

- a. Blend BCDSS services at the AJCs.
  - i. Located BCDSS staff at each American Job Center (AJCs) for 20 hours per week.
  - ii. Provide benefit screening and eligibility determination
  - iii. Refer eligible customers to workforce development programs and WIOA
  - iv. Ensure access to all AJC opportunities for all TANF customers
- b. Cross-train staff: Train all workforce partners to enhance awareness of BCDSS programs, eligibility criteria, and available support services.
- c. Participate in AJC orientations to provide an overview of BCDSS services
- d. Provide referrals to assist in removing barriers to employment
- e. Conduct outreach to BCDSS employed customers to educate them on available training opportunities offered by AJC to promote career pathway and stackable credentialing opportunities
- f. Align and share job-readiness assessment tools to create a more seamless intake process and prevent duplication of effort for customers and staff.
- g. Blend performance measures across programs to aid in reporting.
- h. Leverage opportunities provided by the Maryland State Department of Education Division of Rehabilitation Services (DORS) for TANF customers with disabilities.
- i. Enroll a portion of TANF youth between the ages of 16-24 in WIOA's out-of-school youth program.
- j. Increase utilization of Re-entry Center services for TANF customers who are ex-offenders.

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

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

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

The MOED understands the importance of supporting TANF recipients with obtaining the skills and credentialing they need to increase their earning potential. The AJC offers a combination of education, job readiness, career counseling and support services. TANF recipients are encouraged to enroll in occupational skills training and other sector-based strategies like Career pathways and other training strategies. To ensure these strategies are achieved the following has been implemented:

- Co-location of LDSS both AJC to provide services in accordance with WIOA MOU
- Outreach Coordinator provides weekly orientation and MWE enrollment sessions to TANF customers enrolled in the Employment Continuum program at the Workforce Reception Center (WRC)
- Distribution of Now Hiring publication and training opportunity available thru the AJC
- Leverage existing RSA 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
- Providing Partner Access to MWE to facilitate case management, data sharing and job search/placement tools
- 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.

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

This section should include-

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

There are currently 48,163 SNAP Work Registrants in Baltimore City DSS.

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

Please note that the finalization of the Public Health Emergency, which currently waives SNAP work registrants, including Able-bodied Adults with Dependent Children (ABAWDs) from work and education requirements, is ending on May 11, 2023. The Department of Human Services will enact the ABAWD work and education requirements on July 1, 2023. Therefore, the following process is our tentative plan, though it might change. Our tentative process for supporting SNAP work registration access, available support, and workforce development programs is to assess each SNAP work registrant. Those that are mandated to meet the work/education requirement will be referred to available supports and workforce development programs, based on their needs and interest:

1. BCDSS' SNAP E&T Partner (we currently do not have a SNAP E&T Partner, as we are awaiting funding from DHS to award a SNAP E&T Partner);
2. DHS SNAP E&T Partners in Baltimore City;
3. Baltimore City WIOA Partners; and
4. Other local partners in the Unite Us database.

(C) List the available SNAP E&T third party partners in your local jurisdiction and describe how the third party partners are being engaged to ensure they are aware of all workforce development programs available in the WIOA system, streamline resources, and prevent duplication of services. Note: Local Areas should work with their Local Department of Social Services for assistance in accessing this information.

1. Baltimore City Community College (BCCC)
2. Center for Urban Families (CFUF)
3. Civic Works
4. Goodwill Industries of the Chesapeake
5. Humanim
6. Jane Adams Resource Center (JARC)
7. Job Opportunities Task Force (JOTF)
8. Maryland Food Bank
9. The National Center on Institutions and Alternatives (NCIA)
10. Our Daily Bread Employment Center of Catholic Charities
11. United Way
12. The Work First/ America Works
13. Bugg Hardnett Associates
14. Four Point Education
15. I'm Still Standing Community Corporation
16. Living Classrooms Foundation
17. Maryland New Directions
18. MCVET
19. Roca Baltimore

## Section 11- Community Service Block Grant Functions

This Section includes –

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

### Baltimore City Community Action Partnership

<p>Eastern CAP Center 1731 E. Chase St. Baltimore 21213 Transit Routes: Brown, Gold, Purple, 21</p>	<p>Southeast CAP Center 3411 Bank St. Baltimore 21224 Transit Routes: Navy, Blue, 63, 22</p>
<p>Northern CAP Center 5225 York Rd. Baltimore 21212 Transit Routes: Red, 56</p>	<p>Southern CAP Center 606 Cherry Hill Rd. Baltimore 21225 Transit Routes: 71, 26</p>
<p>Northwest CAP Center 3939 Reisterstown Rd. Baltimore 21215 Transit Routes: 85, 83, 82</p>	

The Baltimore City Community Action Partnership provides limited employment training programs:

- Financial Empowerment Services
- Utilities Assistance
- Eviction Prevention; and food security
- Resume writing and job applications via case management
- Referrals to MOED

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

- Potential co-location of Community Action Agencies (CAAs) and/or WIOA Partners at American Job Centers or CAAs depending on the nature of local partnerships and operations;
  - The Community Action Partnership (CAP) will co-locate staff in the One-Stop Centers to provide information and services to AJC customers. The CAP staff will also participant in the Center’s information sessions and deliver Financial

Empowerment services at least two days per month.

- 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;
  - Through the Resource Sharing Agreement, the CAP will contribute towards the infrastructure cost of the One-Stop Career Centers; and leverage services and resources provided by other partners.
- Cross train and provide technical assistance to all WIOA Partners about CSBG;
  - CAP staff will cross train the WIOA partners and One-Stop center staff about CSBG services and provide technical assistance as needed. CAP staff will receive training by MOED's One Stop Operator on One- Stop customer flow, service delivery, and partner referrals. CAP staff will attend the quarterly WIOA's One Stop Partner and center's staff meetings where all partners share information.
  - The BCCAP director will also attend the Baltimore Workforce Development Board meetings.
- Ensure that activities are countable and tracked for CSBG performance metrics;
  - MOED will ensure countable CAP activities are tracked for CSBG performance metrics; and will collect and share participant job placement information.
- Access to business services and employer initiatives to attract and better serve employers by marketing joint services, minimizing the burden on employers who use the centers, and provide employer-focused services through a single point of entry rather than through all partnering programs; and
  - A CAP staff will collaborate with the Center's Business Services Representative on business services and employer initiatives to align efforts.
- Contribute and provide baseline outcomes data to the WIOA system through strategies for collecting and reporting varied program reporting requirements.
  - CAP will provide MOED with data for shared participants including services provided within the One Stop Center, job placement and retention outcomes and services provide to employers.

(C) A description of the CAA representation on the Local Board to ensure that CSBG expectations, roles, and responsibilities are addressed in the Local Area. A representative of the CAA is a required partner on the Local Board based on the GWDB's Local Board certification policy.

The Baltimore City Community Action Partnership director, Angela Whitaker, has been attending the Baltimore Workforce Development Board meetings within the last several years and was nominated to the Board during the nomination cycle in January 2022. She was accepted at the 3<sup>rd</sup> quarterly meeting in March 2022.

## Section 12 – Jobs for Veterans State Grants Functions

This Section includes –

- (A) A description of how priority of service to veterans and their eligible spouses will be provided in the American Job Center.

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

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

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

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

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

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

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

*AJC staff provides core services and initial assessments to veterans.*

The greeter or other American Job (AJC) staff who work at the front desks are trained to determine whether any customers are veterans. Customers who self-attest to veteran status shall receive priority of service from this point forward.

Individuals who self-identify as a veteran or eligible spouse to the greeter upon entering the Job Center are screened with the Veterans Significant Barriers to Employment Checklist to identify significant barriers. Those veterans identified as having significant barriers (and determined to need additional assistance) are directly routed to the Disabled Veterans' Outreach Program (DVOP) specialist in the center. Those veterans who do not have significant barriers are seen by other staff and will receive priority of service within the American Job Center.

### ***Verifying Veteran Status***

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

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

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

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

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

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

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

1. Has been terminated or laid off, or received a notice of termination or layoff from employment;
2. Is eligible for, or has exhausted, unemployment insurance (UI) benefits;

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

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

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

In the case of separating service members, because they may be on a terminal leave from the military, a separating service member may begin to receive career services while the service member may still be part of the Active Duty military, but has an imminent separation date. It is appropriate to provide career services to separating service members who will be imminently separating from the military, provided that their discharge will be anything other than dishonorable.

### ***JVSG Funds Are Provided to Fund Two Staff Positions***

**Disabled Veterans' Outreach Program (DVOP) Specialists** -- Under 38 U.S.C. 4103A(a), a DVOP specialist provides intensive services<sup>5</sup> and facilitates placements to meet the employment needs of veterans, prioritizing service to special disabled veterans, other disabled veterans, and other categories of veterans in accordance with priorities determined by the Secretary of Labor (Secretary); and

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

## **Monitoring Priority of Service**

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

- (B) A description of how MOED on behalf of the BWDB will engage Local Veterans Employment Representatives in engaging and providing services to local businesses.

All job orders developed by the MOED 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 13 – Trade Adjustment Assistance for Workers Program Functions

This Section includes –

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

The Trade Adjustment Assistance (TAA) program is a federal entitlement program established under the Trade Act of 1974, as amended by the Trade Adjustment Assistance Reform Act of 2002. The TAA Program provides aid to workers who lose their jobs or whose hours of work and wages are reduced as a result of foreign trade. More information on petitions for TAA can be found on the MD Labor website. (<https://www.labor.maryland.gov/employment/taa.shtml>)

Individuals who qualify for Trade Adjustment Assistance can receive services through the American Job Center. Partner staff may bill the Trade Adjustment Assistance program for time spent assisting participants with paperwork for training. WIOA funds may be used to provide other services that are not covered by the TAA funds.

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). AJC staff with access to the Maryland Workforce Exchange (MWE) will maintain and monitor the delivery of individualized career services to participants within the system.

Services available through the Trade Act:

- Training- classroom training, on-the-job training, and customized training designed to meet the needs of a specific employer or group of employers, apprenticeship programs, and more.
- Trade Readjustment Allowances (TRA) -income support available in the form of weekly cash payments to workers who are enrolled in a full-time approved training course and have exhausted all rights to State and Federal Unemployment Insurance.
- Work Search Allowances- may be payable to cover expenses incurred in seeking employment outside your normal commuting area.
- Relocation Allowances- provide reimbursement for approved expenses if you are successful in obtaining employment outside your normal commuting area for you to relocate to your new area of employment.
- Alternative Trade Adjustment Assistance (ATAA) and Reemployment Trade Adjustment Assistance (RTAA)- a wage subsidy for up to two years that is available to reemployed older workers, age 50 and over, and covers a portion of the difference between a worker's new wage and his/her old wage (up to a specified maximum amount).

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

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

(C) A description of how Trade participants will be co-enrolled in other programs.

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

## Section 14 – Unemployment Insurance Functions

This Section includes –

- (A) Under WIOA Title I and Title III, MOED and its partners will support Unemployment Insurance claimants and provide meaningful access to 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 receiving Unemployment Insurance that are most likely to exhaust benefits before finding employment. Forty-five (45) day follow-up workshop activity is required by each claimant to assist the customer in obtaining employment or exploring resources they may need while on unemployment. **These services include but are not limited to one-on-one employment assistance, resume assistance, and job fair notifications.** The workshop leader is to ensure engagement within center services and to follow up to see if each participant has attended the additional designated workshops.

ROWs (Reemployment Opportunity Workshops) are federally funded, but administered by State staff, and target individuals receiving Unemployment Insurance that are least likely to exhaust benefits before finding employment. 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 also provide 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.

- B) MOED on behalf of the local Board will utilize the Wagner-Peyser program and the RESEA and ROW programs to provide access to local workforce development services for Unemployment Insurance claimants.

The Wagner Peyser program and RESEA and ROW programs provide claimants access to the full menu of services of the AJC through RESEA and WIOA programs. An AJC staff member presents information about services, resources and job opportunities – and the Wagner Peyser staff meets one on one with each ROW and RESEA customer to identify their needs and refer them to other services (e.g., WIOA, employment opportunities) and/or to other workforce partners in the One-Stop.

## Section 15 – Senior Community Service Employment Program Functions

This Section includes –

- (A) A list of Senior Community Service Employment Program (SCSEP) providers in the Local Area. Explain how SCSEP is administered in the Local Area, including grantee and subgrantee information, if applicable.
- MD Department of Labor is the State Grantee for SCSEP. There are no subgrantees; however, MD Labor employs an Employment Specialist in each Local Area for which the State Grantee is responsible for administering the SCSEP Program.
  - Center for Workforce Inclusion, Senior Community Service Employment Program
- (B) A description of how Senior Community Service Employment Program services will be provided in the American Job Center system within the Local Area.

Both Center for Workforce Inclusion and Maryland Department of Labor, Senior Community Services Employment Programs (SCSEP) – are co-located in the Baltimore City AJCs. Center for Workforce Inclusion, SCSEP service is available part-time at the Eastside One-Stop Career Center and MD Labor SCSEP is available at the Northwest One-Stop Career Center.

The program staff will:

- a) Conduct outreach and intake at the AJC as well as participate in the AJC's orientation sessions;
- b) Provide employment and training services to older and disadvantaged individuals;
- c) Provide opportunities for eligible participants to learn, work and serve others;
- d) Provide case management and supportive services to participants in training programs, and
- e) Refer clients to other workforce development partners as appropriate.

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

This Section includes –

(A) Baltimore City’s Equal Opportunity Officer for WIOA is listed below, including a link to an online request.

Patricia Morfe  
Director/Local EOO Mayor’s Office of  
Employment Development 417 E. Fayette  
Street, Suite 468  
Baltimore, MD 21202  
410-396-1261  
Patricia.morfe@baltimorecity.gov

Via On-Line Assistance Request:

[https://docs.google.com/forms/d/e/1FAIpQLSfQWT93X1\\_IYol2jPZ-jVJv53i8ccTW1JiqXg1hOoE2sUQVjg/viewform](https://docs.google.com/forms/d/e/1FAIpQLSfQWT93X1_IYol2jPZ-jVJv53i8ccTW1JiqXg1hOoE2sUQVjg/viewform)

Via Maryland Relay Calling Options

Staff may use the Maryland Relay services by dialing 711 or 800-735-2258 for TTY calling

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

The MOED and One-Stop partners will continue to comply with the physical and programmatic accessibility requirements of Section 188 of WIOA, 29 CFR Part 38, and provisions of the Americans with Disabilities Act of 1990. The career center staff and partners deliver “Basic Services” to all populations including individuals with disabilities and Limited English Proficiency. 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

(C) BWDB understands and acknowledges that, while Section 188 of WIOA and 29 CFR Part 38 ensure equal opportunity for individuals with disabilities, sub-recipients may also be subject to the requirements of:

- Section 504 of the Rehabilitation Act, which prohibits discrimination against individuals with disabilities by recipients of Federal financial assistance;
- Title I of the ADA, which prohibits discrimination in employment based on disability;
- Title II of the ADA, which prohibits State and local governments from discriminating on the basis of disability;
- Section 427 of the General Education Provisions Act; and
- Maryland Anti-Discrimination laws, including Code Ann. §10-1102-1103, which stipulates that oral language services must be delivered on-site for those in frequent contact with a service provider.

For individuals who require oral language services, MOED utilizes the “Language Line” to provide meaningful access to One-Stop services and partners.

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. 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 MD Labor 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 this 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 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 as, and equal to, communications with non-disabled individuals.

(D) Baltimore City American Job Centers will ensure meaningful access<sup>28</sup> to all customers.

MOED maintains operations at two 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 the satellite Employment Connection Center, 1410 Bush Street. All centers are accessible via mass transportation. Individuals with disabilities visiting the centers enter a fully accessible building with accommodations available ensuring access to services.

MOED is dedicated to taking reasonable steps to provide meaningful access to One-Stop services to all people, including individuals with Limited English Proficient. Interpretation services are available for Limited English Proficient (LEP) customers via the Language Line. To ensure that limited English or non-English speaking customers receive equal access to services, "I Speak" boards are posted. The LEP customer can point to their language and staff can utilize the Language Line to provide services. Similarly,

assistive technology equipment is available for those visually impaired customers and on-demand video relay is available to customers that require sign language interpretations

MOED in coordination with the Mayor's Office of Immigrant Affairs (MIMA) is guiding implementation of language assistance for such individuals.

MIMA will translate vital documents in other languages for the One-Stops. Some vital documents include:

- Consent for Information Form
- Sexual Harassment Policy
- Equal Opportunity is the Law
- Complaint, Mediation and Grievance Procedures
- Individual Employability Plan (IEP)

The One-Stop Career Centers have access to the Language Line account provided by MIMA.

Additionally, MIMA will provide ongoing training for One-Stop staff on how to effectively use the Language Line to serve LEP customers.

(E) MOED on behalf of the BWDB will follow the listed procedures below for handling grievances and complaints from participants and other interested parties affected by the local American Job Center system, including partners and service providers. Federal regulation on grievances and complaints can be found at: 29 CFR 38.69-97. Provide a separate description for the:

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

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 MD Labor and the directorate of Civil Rights, Washington, D.C. of the existence of the complaint. 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 CRC within thirty (30) days of the expiration of the ninety (90) day period (in other words, within 120 days of the date on which the original complaint was filed). If the complainant is dissatisfied with MOED's resolution of the complaint, the complainant may file a complaint with CRC. Such complaint must be filed within thirty (30) days of the date the complainant received notice of the MOED's proposed resolution.

A complaint may be filed directly with the Civil Rights Center (CRC) within 180 days of the alleged discrimination through the Complaint Information Form sent by postal mail to the Director, Civil Rights Center Attention: Office of External Enforcement, US Department of Labor, 200 Constitution Ave NW, Room N-4123, Washington DC 20210; by fax to 202-693-6505 attention: Office of External Enforcement; or by email to [CRCEXternalComplaint@dol.gov](mailto:CRCEXternalComplaint@dol.gov). Persons with a disability who require auxiliary aids and services in order to file a complaint, to access the CRC complaint form, or during the CC complaint process should contact the CRC by email at [CRCEXternalComplaints@dol.gov](mailto:CRCEXternalComplaints@dol.gov), by phone at 202-693-6500 or TTY/TRS 1-800-877-8339.

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

The MOED EO officer in coordination with the Baltimore City Office of Civil Rights will facilitate complaints and grievances not alleging illegal forms of discrimination including labor standards violations.

- 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).

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<sup>28</sup> The Equal Employment Opportunity Commission provides an example of “meaningful access” as it relates to language access for individuals with Limited English Proficiency as “Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior compared to programs or services provided to English proficient individuals,” available at: <https://www.eeoc.gov/eeoc/plan/lap.cfm>.

An individual can request an accommodation:

Under the ADA, an individual with a disability can request an accommodation and assistance in order to understand, use and benefit from the services in the One-Stop Center and youth providers. During the initial visit to the Center, or through an advanced correspondence, an individual can ask for assistance to understand and/or access the range of services the programs offer. Some accommodations may include:

- an individual meeting rather than group orientation
- help with filling out any registration forms
- brochures, flyers, and other information in an alternative format such as a different language, Braille, or large print
- sign language interpretation
- using a tape recorder to remember information
- adaptive equipment to use computers and phones

(F) A description of the 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.

(G) A description of how MOED on behalf of the BWDB 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.

(H) A description of the policies 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.

- (I) A description of the steps taken to meet the language needs of individuals with Limited English Proficiency who seek services or information. The description should include how the Local Board proposes that information will be disseminated to individuals with Limited English Proficiency, including using oral interpretation and written translation services in accordance with Maryland State Government Code Ann. §10-1102-1103, which stipulates that oral language services must be delivered on-site for those in frequent contact with a service provider.

For individuals who speak limited English, MOED plans to translate vital documents into Spanish, French, Chinese, Arabic, & Korean and utilize the “Language Line” for oral interpretation services and/or bilingual staff from MOED staff and/or partnering agencies. The “I Speak” signage is prominently displayed in the AJC reception/ waiting areas so individuals can “point to their language” for interpretation service. The MOED will notify LEP customers that language assistance services are available at no cost.

Some ways of accomplishing this objective include:

- Posting signs in intake areas and other customer entry points.
- Placing notices that language services are available in outreach documents (brochures, recruitment information, etc.) in appropriate languages and that language services are available.
- Working with community-based organizations to inform LEP persons of the language assistance available.
- Making presentations and/or posting notices at schools and religious organizations.
- Posting information on MOED Website to announce Language Assistance services

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

This Section includes –

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

The Mayor’s Office of Employment Development, on behalf of the City of Baltimore, is responsible for the disbursement 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 could include: available audit information; requiring disclosures of conflict of interest and relevant criminal violations; prohibiting profit, if applicable; requiring certifications of senior entity officials. Our award agreements should provide MOED with strong remedies to address non-compliance, combined with flexibility to adjust its oversight framework based on risk considerations and assessments.

Agreements include Standard Exhibit (G) Certification Regarding Debarment, Suspension, and Other Responsibility Matters. The Authorized Representative is required to certify that the principals are not debarred, suspended or excluded from covered transactions by any Federal department or agency, not convicted of fraud or a criminal offense performing a public transaction or contract, not presently indicted, no public transactions terminated for cause or default within a three-year period preceding the application/proposal.

In keeping within the guidelines of Public Law 101-166, section 511 Stevens Amendment, all documents describing federally funded projects or programs must include the following printed fiscal language.

- (1) the percentage of the costs of the program or project which will be financed with Federal money
- (2) the dollar amount of Federal funds for the project or program, and
- (3) percentage and dollar amount of the total costs of the project or program that will be financed by nongovernmental sources.

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 MD State Department of Labor, 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 at least 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.

Additionally, as described in section 4C, the Baltimore Workforce Investment Board released an RFP for a complete process for the selection of the WIOA One Stop Operator.

- (D) A description of the actions the BWDB 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 Baltimore Workforce Development Board and subcommittees for youth, and One Stop operations.

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.

(E) MOED on behalf of the BWDB has a written policy for the Local Area's Individual Training Account policy. The description includes information such as selection process, dollar limits, duration, etc. and must be in accordance with the State's WIOA Title I Training and the Eligible Training Provider List policy.

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 (revised April 2018).

Detailed procedures for adding a new school or course are outlined in MD Labor Policy Issuance 2017-09- WIOA Title I Training & Maryland's Eligible Training Provider List - October 26, 2017. <https://www.labor.maryland.gov/employment/mpi/mpi9-17.pdf> The MOED will comply with the policies set forth within the MD Labor current policy and subsequent policies for recommending new programs or courses be added to the Eligible Training Provider List.

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

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 nine 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 was revised to include WIOA changes and was updated in December 2019.

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 Employer 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.

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

The MOED and its core partners leverage the MWE website to ensure that job seekers have 24-hour access to assessments, labor market information, resume development and job matching. The MWE Jobs Mobile App 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.

The One-Stop Career Centers utilize the myriad of integrated, technology-enabled features available in the MWE, such as: MWE VOS Greeter, Comprehensive Case Management, “Read-Only” access for partners and Performance Management:

1. The One-Stop Career Centers utilize the MWE VOS Greeter Module to record visitor traffic electronically in lieu of a paper-sign-in sheet. The module enhances the customer experience and allows the centers to track the number of individuals visiting and capture the purpose of their visit;
2. The MWE comprehensive features (i.e., client tracking, case management and employer services) are utilized by WIOA staff to determine eligibility, document services and outcomes for employers

and individuals served across the number of WIOA programs: WIOA Title III – Wagner-Peyser, Trade, and Veteran Services; WIOA Title I Adult, Dislocated Worker, Youth programs; and discretionary grants. Staff assist job seekers with unemployment insurance job contacts on REX, resume development, researching labor market information, and job search. The business/employment service team assist employers with job order posting, recruitment, and labor market services;

3. “Read-Only” access provides One-Stop partners with access to the MWE. This feature provides limited access to partners to view information, services and the progress of their customers enrolled in programs at the One-Stop; and
4. One-Stop Career Center managers utilize the MWE for determining center performance and tracking staff goals. MOED’s Performance Evaluation Division (PEDS) utilize the MWE to manage performance data to ensure compliance with state and federal requirements.

(H) A description of the 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 are monitored (includes programmatic and fiscal elements) at least once during each full twelve-month period of the underlying agreement. An evaluation of risk factors will determine whether or not monitoring is conducted if the agreement period is less than twelve months. 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;

A description of our related processes and controls is provided throughout our responses to individual questions posed in Section 17 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 (e.g. Quarterly Reports and Closeout Reports to MD Labor). 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.

- 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. An original copy was filed with MD Labor in April 2014. Procedures were revised in August 2020 to ensure compliance with current guidelines and regulations. (Attachment 2)

- Monitoring Risk Factors and Risk Assessments

Risk Factors and Risk Assessments include years of service, status of Good Standing with the State, A-133 audit results, and appropriate policies and procedures in place. Factors are included in the Sub-Recipient Monitoring Checklist incorporated in MOED's Fiscal Monitoring Procedures

- 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. An original copy was filed with MD Labor in April 2014 and revised in August 2020.

- Provisions of technical assistance as necessary and appropriate; and

MOED continually commits to providing technical assistance to subgrantees when necessary and appropriate.

- Specific local policies developed by the Local Board for oversight of the American Job Center system, youth activities and employment and training activities under Title I of WIOA.

MOED develops local policies as necessary based on federal Training and Employment Guidance Letters and MD Labor Policy Issuances. Current local policies include Priority of Service, Justification for Training, Documenting Eligibility Barriers, Income Guidelines, Stevens Amendment, Record Retention Policy updates, ITA Procedures updates, and Grievance Procedure updates.

- (I) A description of the policy and procedures regarding the safeguarding and handling of personally identifiable and confidential information (ex., physical and electronic files), including the incident response plan for loss of records.

MOED makes every effort to protect personally identifiable information and have procured AppRiver's Secure File Sharing and Email Encryption software that permit the transmission of sensitive data safely and securely via email. 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.

Aligning with MD Labor Policy Issuance 2019-4: Privacy and Data Security, MOED has implemented a local Operational Policy 2019-2 outlining the protection of data and sensitive information included in physical data, electronic data, and the protocols MOED will follow in the event of a physical or electronic security breach. Staff have signed an Employee Acknowledgement form which acknowledges receipt of the policy, agreement to adhere to the highest level of confidentiality involving sensitive and personally identifiable customer information, understanding the importance of safeguarding confidential electronic/paper files and reports; and if a breach occurs staff will immediately notify their supervisor so appropriate actions can be taken.

If a breach were to occur, the Agency Director will notify the Baltimore City Solicitor's Office and the staff outlined in MD Labor Policy Issuance 2019-4 within three (3) days and include a brief description of the breach including types of data; what has occurred to investigate the breach, mitigate losses, and protect against any further breaches; contact information of persons leading the investigation; and the process of notification to the affected customers.

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. As an agency under the direction of the City of Baltimore, MOED will also adhere to any local City policies and processes regarding a security breach of personally identifiable information.

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

MOED follows the procurement policies and procedures outlined by the City of Baltimore. 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. Emergency contracts will be expedited to the City Procurement Agent (CPA) for immediate action.

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.

The City of Baltimore procurement practices conform to the standards in USDOL regulations. Additionally, an Ethics and Professional Conduct policy requires maximum objectivity and fair treatment to all individuals and businesses doing business or desiring to do business with the City of Baltimore.

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

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.

(L) A description of any policies or procedures the BWDB 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.

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

- Tracks funding types, funding amounts, obligations, expenditures and assets;
- Permits the tracking of program income, stand-in costs, and leveraged funds; and
- Is adequate to prepare financial reports required by the State.

The City of Baltimore Workday Enterprise Resource Planning (ERP) system was developed and launched in December 2020 to fully integrate all legacy systems into a more efficient solution to manage the city's financial business processes. It is designed to track and report actual costs against established operating budget's hierarchy activity categories (e.g. fund type, grant number, cost centers) and natural account codes called spend categories. Each funded activity requires a detailed operating budget and alignment with appropriate cost center categories, ledger accounts, and spend categories accounts. 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 Workday Finance Workstream platform called Foundation Data Model. This platform supports accounting and financial reporting, account structure, and the use of worktags instead of accounting codes to represent the purpose of a transaction. Workday provides real-time access to generated budget to actual reports and pre-encumbrances and encumbrances.

b. Obligation Control System

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.

(N) 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/Chief Financial Officer; Manager of Fiscal Operations; Manager of Grant Reporting; and Manager of Contracting & Compliance.

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

A description of our related processes and controls is provided throughout our responses to individual questions posed in Section 16 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 at 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 (e.g., Quarterly Reports and Closeout Reports to MD Labor). 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.

(P) A brief description of the following:

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

City of Baltimore's Workday system is designed to track and report actual costs against established operating budget's hierarchy activity categories (e.g. fund type, grant number, cost centers) and natural account codes called spend categories. Each funded activity requires a detailed operating budget and alignment with appropriate cost center categories, ledger accounts, and spend categories accounts. 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 Workday Finance Workstream platform called Foundation Data Model. This platform supports accounting and financial reporting, account structure, and the use of worktags instead of accounting codes to represent the purpose of a transaction. Workday provides real-time access to generated budget to actual reports and pre-encumbrances and encumbrances.

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 available funding. A variety of review processes are put in place to monitor and control the level of obligations and subsequent expenditures.

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 the City of Baltimore's chart of accounts, allows MOED to capture, segregate, track and report 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 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 City of Baltimore Human Capital Management (HCM) payroll system functions in Workday. The Workday system provides employees, managers, and HR professionals access to create and maintain HR related records. Through Workday individual time sheets are updated daily or weekly and submitted to managers for approval and submission for each payroll period. Time and attendance reports must be entered by staff person and approved his/her supervisor. The City of Baltimore's Payroll Department processes all payrolls and manages the HCM Payroll System. MOED's HR 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.

(Q) A description of the 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 MD Labor quarterly and typically on a cost reimbursement basis.

(R) A description of the fiscal agent's cost allocation procedures including:

- Identification of different cost pools,
- Procedures for distribution of staff costs between cost categories (Administrative cost, program cost and indirect cost),
- Procedures used for distribution of funds from each cost pool,

- Description of funds included in each cost pool, and
- Description of cost allocation plans for American Job Centers.

### Cost Allocation Plan

During both the budgeting (e.g., detailed budgets are required by MD LABOR) and quarterly reporting (of actual expenses) processes, 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, are allocated using a Direct Cost Allocation Method with Modified Total Direct Costs used as

the basis for allocation. This methodology follows guidelines 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 are 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 is assessed a fair share of the commonly shared operating costs of the One-Stop system.

(S) A description of the 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.

## 2020-2024 Local Plan Assurances

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

		<b>Assurance</b>
X	1.	Consistent with WIOA Section 108(d), for the 2020-2024 Plan, the Local Board has held at least one public comment period of no less than 30 days to obtain input into the development of the Local Plan and to provide the opportunity for comment by representative of business, labor organizations, education, other key stakeholders, and the general public.
X	2.	The final Local Plan is available and accessible to the general public.
X	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.
X	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.
X	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.
X	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.
X	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.
X	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.
X	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.

X	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.
X	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.
X	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.
X	13.	The Local Board ensures that outreach is provided to populations and sub-populations who can benefit from American Job Center services.
X	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.
X	15.	The Local Board complies with the nondiscrimination provisions of Section 188, and assures that Methods of Administration were developed and implemented.
X	16.	The Local Board collects and maintains data necessary to show compliance with nondiscrimination provisions of Section 188 of WIOA.
X	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.
X	18.	The Local Board ensures that American Job Center staff, along with the Migrant and Seasonal Farmworker program partner agency, will continue to provide services to agricultural employers and Migrant and Seasonal Farmworkers that are demand-driven and consistent with MD Labor policy.
X	19.	The Local Board follows confidentiality requirements for wage and education records including, but not limited to, 20 C. F. R. 603, the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended, WIOA, and applicable State laws, Departmental regulations and policies.
X	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.

X	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.
X	22.	The Local Board ensures compliance with the uniform administrative requirements under WIOA through annual, on-site monitoring of each local sub-recipient.
X	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.
X	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.
X	25.	The Local Board will not use funds received under WIOA to assist, promote, or deter union organizing.
X	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.
X	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.
X	28.	The Local Board has a written policy and procedures that establish internal controls, documentation requirements, and leveraging and coordination of other community resources when providing supportive services and, as applicable, needs-related payments to eligible adult, dislocated workers, and youth enrolled in WIOA Title I programs.
X	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.

X	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.
X	31.	The Local Board will provide reasonable accommodation to qualified individuals with disabilities unless providing the accommodation would provide an 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.

*Brandon M. Scott*  
 Local Chief Elected Official(s)

03/25/2021  
 Date

Yariela Kerr-Donovan  
Digitally signed by Yariela Kerr-Donovan  
 Date: 2021.03.24 16:37:20 -04'00'  
 Local Workforce Development Board Chair

03/24/2021  
 Date

Jason Perkins-Cohen  
Digitally signed by Jason Perkins-Cohen  
 Date: 2021-03-25 09:48:21  
 Local Workforce Development Director

03/25/2021  
 Date

# Baltimore City List of Attachments

1. Individual Training Account Procedures
2. Sub-Grantee Monitoring Plan
3. Grievance/ Complaint Procedures
4. Conflict of Interest Form

# WIOA

## Individual

## Training

## Accounts

# Procedures Manual



**Mayor's Office of Employment Development**

Revised: April, 2018

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 MD Labor's Eligible Training Provider list found on the web:

<http://webapps.labor.maryland.gov./wioa/CountyPgmDescs.aspx>

WIOA Title I (Adults and Dislocated Workers) and special populations funded by WIOA and other funding sources can apply for an ITA. Funding is capped at \$3000. Any amount over \$3000 but not to exceed \$4500 may be submitted for consideration and approval to MOED's Assistant Director for Adult Services. 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 listed on MD LABOR's Eligible Training Provider List which should include the cost of the course, books, and exam fees where applicable. If a customer enrolled in any training course(s) funded by MOED in the past three (3) years, they will not be eligible for additional training. Exceptions may be considered 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 Workforce Development Board approved and in demand in the Baltimore metropolitan area.

### **MOED Policies Pertaining to Individual Training Accounts**

1. Customers approved for training are expected to begin classes on the assigned training start date. Exceptions may include: (a) death in the immediate family, illness or other medical reasons precluding start, or (b) 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 Title I funded ITA must have an assessment and a documented justification for training on both the Individual Employment Plan and in the Maryland Workforce Exchange Justification for Training screen. 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 or email 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 and meet the eligibility criteria set forth by the applicable funding stream. Additionally, customers must have a family income verifiable to be within the 125% 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). WIOA Adult customers must also meet the criteria for target populations as cited in MD Labor Policy Issuance 2016-10: WIOA Title I Program Eligibility dated November 17, 2016. 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 individuals who have received previous training through MOED, and who are unable to gain employment in the same occupational area or need additional training to advance up the career ladder. Valid justification for requesting training must be completed by the Career Development Facilitator (CDF) and attached to the application. The Division Director has final approval.

### **Functions at the America Job Center**

#### **General Eligibility**

In accordance with MOED's priority of service policy (Operational Policy 2015-5 revised April 3, 2017), priority will be given to veterans and other individuals with low-income or other barriers to employment.

To be considered for a WIOA Title I 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 125% Lower Living Standard
- Customers have an assessment and documented justifications for training

To be considered for a WIOA Title I 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
- have an assessment and documented justifications 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

All WIOA Title I participants must meet the qualifications for training as defined under WIOA sec.134(c)(3)(A)

- be unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services alone;

- be in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment;
- have the skills and qualifications to successfully participate in the selected program of training services;
- be unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as State-funded training funds or Federal Pell Grants established under Title IV of the Higher Education Act of 1965, or requires WIOA assistance in addition to other sources of grant assistance, including Federal Pell Grants;
- be a member of a worker group covered under a petition filed for Trade Adjustment Assistance (TAA) and is awaiting a determination;
- be determined eligible in accordance with the State and local priority system in effect for adults under WIOA regulations sec. 134(c)(3)(E) if training services are provided through the adult funding stream.

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), in the MWE, 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 American Job 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>;

*10 mistakes to avoid when pursuing an online degree* by Thomson & Peterson  
<https://www.petersons.com/college-search/10-mistakes-to-avoid-when-pursuing-an-online-degree.aspx>

*Online Self- Assessment: Carroll Community College* <https://www.carrollcc.edu/Student-Services/Distance-Learning/Online-Self-Assessment/>

The Washington State Board for Community and Technical Courses *Is Online Learning for Me?* questionnaire:  
<https://www.sbctc.edu/becoming-a-student/right-degree-you/is-online-learning-for-me.aspx>

**ITA Orientation** subjects include:

- Customer responsibilities.
- 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 Eligible Training Provider List**

See CDF section for protocol related to customer requested courses not currently on the ETPL.

Detailed procedures for adding a new school or course are outlined in MD LABOR Policy Issuance 2017-09- WIOA Title I Training & Maryland's Eligible Training Provider List - October 26, 2017. <https://www.labor.maryland.gov/employment/mpi/mpi9-17.pdf> The MOED will comply with the policies set forth within the MD LABOR policy for recommending new programs or courses be added to the Eligible Training Provider List.

MD LABOR has been designated as the entity responsible for defining and carrying out the processes and procedures for determining the eligibility of training providers and programs of training services and maintaining the Eligible Training Provider List (ETPL). As the administrator of the Eligible Training Provider List, MD LABOR will be responsible for:

- Developing and maintaining the State ETPL and programs as described in 20 CFR 680.450 (initial eligibility), 20 CFR 680.460 (continued eligibility), and 20 CFR 680.490 (performance and cost information reporting requirements);
- Ensuring that programs meet eligibility criteria and performance criteria established by MD LABOR;
- Removing programs that do not meet State-established program criteria or performance levels, as described in 680.480(c) and in this policy;
- Taking appropriate enforcement actions against providers that intentionally supply inaccurate information or that substantially violate the requirements of WIOA Title I, as described in 680.480(a) and (b); and,
- Disseminating the ETPL, accompanied by performance and cost information related to the public and the Local Boards throughout the State, as further described in 680.500.

In accordance with 20 CFR 680.410, an ETP must be included on the Maryland Eligible Training Provider List and must be one of the following types of entities:

- An institution of higher education that holds a certificate of approval from the Maryland Higher Education Commission (MHEC) or is legally authorized by another State and provides a program that leads to a recognized postsecondary degree or credential;
- An entity that carries out a program registered under the National Apprenticeship Act;
- A public or private provider of training services, which may include:
  - A Private Career School that holds a certificate of approval from the authorizing agency or holds a letter of exemption issued by MHEC;
  - A community based organization;
  - A joint labor-management organization; or,
- An eligible provider of adult education and literacy activities under WIOA Title II if such activities are provided in combination with certain training services; or,
- A Local Board meeting the eligibility requirements set forth in MD LABOR Policy Issuance 2017-09- WIOA Title I Training & Maryland's Eligible Training Eligible Training Provider List - October 26, 2017

All eligible training providers are subject to the equal opportunity and nondiscrimination requirements set forth in WIOA Section 188.

All applicants to the ETPL must:

- possess a Certificate of Approval from the Maryland Higher Education Commission (MHEC);
- receive a letter of exemption or “not regulated status” from MHEC (not required to obtain a Certificate of Approval from the Commission); or
- be advised that the entity must seek approval from the higher education authority in the home State where the out-of-State training provider is conducting training and included on the home State’s ETPL.

A training provider must meet Maryland’s requirements for continued eligibility, as demonstrated via annual performance reporting, and must provide accurate information in order to retain its status as an eligible training provider.

The Local Board may use a contract for services instead of an ITA only when one or more of the following five exceptions apply **and** the Local Area has fulfilled the consumer choice requirements of 20 CFR 680.340, as described below:

Exception 1 - When the services provided are on-the-job training, customized training, incumbent worker training, or transitional jobs;

Exception 2 - When the Local Board documents determination that an insufficient number of eligible training providers exists in the Local Area to accomplish the purpose of a system of ITAs.

Exception 3 - When the Local Board determines that there is a training services program of demonstrated effectiveness offered in the area by a community-based organization to serve individuals with barriers to employment as defined by WIOA and in the Maryland State Plan

Exception 4 - When the Local Board determines that it would be most appropriate to contract with an institution of higher education or other provider of training services in order to facilitate the training of multiple individuals in in-demand industry sectors or occupations, provided that the contract does not limit consumer choice. When using this exception, the Local Board must document its determination in writing.

Exception 5 - When the Local Board is considering entering into a Pay-for-Performance contract.

Additional detail on each exception can be found in the MD LABOR Policy Issuance 2017-09- WIOA Title I Training & Maryland’s Eligible Training Eligible Training Provider List - October 26, 2017

### **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 as defined in the local plan.
  - 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 2), or the school semester start does not fall within sixty (60) days of approval. **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 3) 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 MD LABOR Eligible Training Provider List of WIOA approved vendors/schools. <http://webapps.dllr.state.md.us/wioa/searchfor.aspx>
- Check the ITA MOED List of Approved Agreements 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/ Program Manager who in turn will send to the ITA Liaison and discusses with the Division Director. The Division Director will send the Contracts Manager a ***Request for New ITA Vendor/ Course*** form (attachment 8) 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 4). 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 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 checklist to the ITA Liaison who will review and determine if slots and funds are available in the appropriate funding title. Once returned from the Liaison to the supervisor, the supervisor will email the ITA Customer Application Summary and Checklist, transmittal form, printout of the MD LABOR ETPL course, letters for additional funds, other additional required documents for the course, and Acceptance Letter from the School to the contracting department ITA email address. (ITARRequests@oedworks.com)
- 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 Center Supervisor/ Manager.
- 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 or exams 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 5) 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 supervisor who in turn will notify the ITA Liaison and contract specialist that the customer has begun training. The approval date in the MWE justification must be adjusted to the actual verified start date of training.
- If training is delayed, notify the supervisor, ITA Liaison and contract specialist of delay, enter Training Delay service in the MWE, and work with customer to obtain a new start date through a new acceptance letter. The new acceptance letter and a revised checklist are sent to the contracting department who in turn will complete a new letter of authorization (LOA)
- If customer fails to begin training, notify the supervisor, ITA Liaison and contract specialist so funds can be de-obligated.
- 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. This includes progress reports for participants in on-line courses.
- Follow-up documentation must be included in customer’s file.
- Notify the supervisor, ITA Liaison and contract specialist via e-mail if the customer drops out of class. The contract specialist verifies with the school that the participant has dropped from the program and will send a refund check if applicable.
- Once a customer is no longer in the program (either drops or completes), key the ITA leave date into the MWE or appropriate reporting system and document any measurable skills gains and 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 AJC Manager can review the ITA packets prior to submission to the ITA Liaison and the contracting unit. It is management's responsibility to review each packet for accuracy, proof of eligibility documentation, justification for training is documented, 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 AJC 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.
- Perform quality review of CDF case files.

### **Responsibilities of the Workforce Operations ITA Liaison**

- Review the ITA Summary checklist against budget/ vendor and return to manager for approval.
- Determine appropriate funding source based on customer's eligibility and verify fund availability i.e. WIOA Title I Adult (WA), Dislocated Worker (WD) or Casino Impact Funds (CIA).
- Prepare a weekly ITA report and distribute to the WO Division Director, Assistant Manager, supervisors and managers indicating the status of ITA funding allocations by funding title and vendor.
- Act as point of contact between Workforce Operations, MOED Contracting Unit, PEDS, and Vendors.
- Attempt to resolve any outstanding issues pertaining to start dates, task order, and funding/vendor slot allocation.
- Vendors are to report placement information to the ITA liaison at least 60 days after the placement has been captured.
- Participate in annual monitoring of ITA vendors for programmatic compliance in coordination with Workforce Operations, contracting department and the agency compliance monitor.
- Ensure that customer satisfaction surveys are completed annually by staff other than the CDF and send surveys to Division Director who will take the lead to analyze and make adjustments where necessary. (attachment 7)

### **Responsibilities of the Central Contracting Unit (CCU)**

The CCU has the 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.

The Central Contracting Unit will:

- Upon receipt of the Application Summary and Checklist, review for accuracy. Complete forms will initiate contracting's steps in the ITA approval process. Incomplete forms should be returned to the center manager within 48 hours.
- 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 MD LABOR Eligible Training Provider list.
- Facilitate the new vendor process application for the approved vendor list.
- When the school is approved by MHEC or exception granted, is on the MD LABOR Eligible Training Provider List, and a contract has been approved by the Board of Estimates notify the Career Center staff that participants may be referred to the vendor/ course.
- Develop and maintain a comprehensive ITA report using the MICROIX system as a base. Report must contain customer enrollment information as well as fiscal data.
- Determine appropriate funding source based on customer's eligibility and verify fund availability.
- Forward two copies of the Task Order (attachment 6) to the vendor for completion of 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 MICROIX EN number.
- Enter case information into MICROIX using data from the Letter of Authorization.
- Review the balance in MICROIX to ensure adequate funding to support training.
- Key account information into MICROIX – Document Type- Standard Requisition  
Complete the following line items:
  - Line item 8: Description (Reason/ Justification, customer name).
  - Line item 9: Required Date
  - Line item 10: Bill To.
  - Line item 11: Ship To
  - Line item 12 Vendor Name
  - Line item 16A – 16D: Distribution code, Sub-object, Fund, Grant, Year, Program, Activity, Cost Center.
- 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).
- 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 MICROIX to ensure adequate funding to support training. Notify Workforce Operations Division Director, Workforce Operations Assistant Director, and Comptroller when funding level in any funding source has reached an 80% expenditure level.
- Review weekly MICROIX 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 and receive review and approval from Contracting Manager. 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 through the stages is incomplete.
- Annual monitoring of ITA vendors for fiscal and programmatic compliance in coordination with Workforce Operations and the agency compliance monitor.

## **Audit Responsibilities**

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

- The AJC 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 credentials and measurable skillsgains.
- 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. Determines "Justification for Training" Submits to center management for approval	
Application Summary and Checklist		Completed by CDF Signed off by center management and ITA Liaison Approvals emailed to contracting with transmittal form and Letter of Authorization (LOA)	Reviewed by Contract Specialist for completeness Incomplete forms will be returned to center manager
Transmittal form			Names are logged onto the cumulative spreadsheet for reporting
Authorization to Start Training		CDF notifies customer of start date and presents <u>Welcome Packet</u>	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	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 <i>Customer Application Summary and Checklist</i> 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	Customer <i>Welcome to ITA</i> Packet
Attachment 3	Customer Attendance Log while in Class
Attachment 4	ITA Customer Application Summary And Checklist Form
Attachment 5	Vendor Letter of Authorization
Attachment 6	Task Order
Attachment 7	Customer Satisfaction Survey
Attachment 8	Request for New ITA Vendor/ Course

# BALTIMORE CITY MAYOR'S OFFICE OF EMPLOYMENT DEVELOPMENT

## Individual Training Accounts Application



### Contact Information

<b>Name:</b>	.....
<b>Last 4 of Soc. Sec:</b>	.....
<b>Address:</b>	.....
<b>City/State/Zip:</b>	.....
<b>Home Phone #:</b>	( ) .....
<b>Message Phone#:</b>	( ) .....
<b>E-Mail Address:</b>	.....

Revised 4/2018

# 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 Career Development Facilitator (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 Maryland Eligible Training Provider List approved vendor that offers this course.

Allstate

JARC

Baltimore City Community College

MCAT

Virginia L. Grant (GRACE)

Community Colleges of Baltimore County

Stein Academy

Catonsville

Towson

Dundalk

TranZed

Essex

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?

<b>3. What are the entry requirements for this occupation?</b>	
<b>4. Use O*Net to obtain information about the occupation you have chosen. Attach a copy of the occupation and summary reports.</b>	
<b>Training Requirements:</b>	
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.	
<b>5. What are the entry requirements for this training?</b>	
<b>6. How long will it take a student to complete this training? (must be completed within 12 months of start date)</b>	
<b>7. List the start and end dates of the next two (2) classes scheduled.</b>	
Start Date 1:	End Date 1:
Start Date 2:	End Date 2:

## 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)			\$

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

## **Financial Aid**

Students must apply for financial aid (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 aid 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.

## Welcome to Individual Training Accounts (ITA)!

***Congratulations – Your ITA Application for training 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 imperative that we keep in touch as we will be monitoring your progress. Should you encounter any challenges that might affect your ability to successfully complete training and/or obtain employment, please 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 class as scheduled, your funding may be reallocated unless:

- o The School changed your start date
- o You were ill or in accident
- o 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 email, fax, 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 progress reports, report cards and/ or certificates as you complete modules of your training, please provide us with a copy of these forms. If you are having difficulties, let us know. Our Career Center Staff and Resource services are available to you. Please initial if you agree to provide MOED progress reports.

Customer's initials here: \_\_\_\_\_

### **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 training is to prepare you for the career or job in your training field. Once you obtain employment, please provide the following information to your CDF:

- o Employer's Name, Address, Zip Code, Phone Number and E-mail Address (if available)
- o Job Title, Start Date, Work Hours, Contact Person, Wage, and Benefits (if available)
- o 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 in which you began your journey. Your Career Development Facilitator can be reached at

**Baltimore City Career Center Network**

<b>Career Center</b>	<b>Phone number</b>
Employment Connections Center	410-396-1052
Eastside American Job Center	410-396-9030
ReC at Northwest AJC	410-396-7873
Workforce Reception Center	410-396-6580

Your Career Development Facilitator is: \_\_\_\_\_

at \_\_\_\_\_.

A representative from the Mayor's Office of Employment Development may also contact you to complete a customer satisfaction survey. Please be honest with your answers – we are always seeking to improve our services.

***Good Luck!***

I have reviewed, understand and agree to the requirements explained in this *Welcome to Individual Training Accounts Packet*.

Name: \_\_\_\_\_ Date: \_\_\_\_\_

**For Office Use Only**

- Original copy is to be kept in the customer's file.

## STUDENT ATTENDANCE LOG

<b>Name:</b>				<b>For Month of:</b>				
<b>School:</b>				<b>Social Security # (Last 4):</b>				
<b>Training Course:</b>								
<b>Start Date:</b>				<b>Est. Completion Date:</b>				
<b>Course #</b>			<b>Hours &amp; Days Per Week</b>			<b>Instructor's Name</b>		
<b>Week 1</b>	<b>Course #</b>	<b>Monday</b>	<b>Tuesday</b>	<b>Wednesday</b>	<b>Thursday</b>	<b>Friday</b>	<b>Saturday</b>	<b>Instructor's Initials</b>
		<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	
<b>Week 2</b>	<b>Course #</b>	<b>Monday</b>	<b>Tuesday</b>	<b>Wednesday</b>	<b>Thursday</b>	<b>Friday</b>	<b>Saturday</b>	<b>Instructor's Initials</b>
		<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	
<b>Week 3</b>	<b>Course #</b>	<b>Monday</b>	<b>Tuesday</b>	<b>Wednesday</b>	<b>Thursday</b>	<b>Friday</b>	<b>Saturday</b>	<b>Instructor's Initials</b>
		<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	
<b>Week 4</b>	<b>Course #</b>	<b>Monday</b>	<b>Tuesday</b>	<b>Wednesday</b>	<b>Thursday</b>	<b>Friday</b>	<b>Saturday</b>	<b>Instructor's Initials</b>
		<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	
<b>Week 5</b>	<b>Course #</b>	<b>Monday</b>	<b>Tuesday</b>	<b>Wednesday</b>	<b>Thursday</b>	<b>Friday</b>	<b>Saturday</b>	<b>Instructor's Initials</b>
		<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	<b>Date:</b>	

Center: \_\_\_\_\_

CDF: \_\_\_\_\_

Center Fax Number: \_\_\_\_\_

CDF Email Address: \_\_\_\_\_

<b>Date:</b>	<input type="checkbox"/> ESCC <input type="checkbox"/> ECC <input type="checkbox"/> Other: _____	<input type="checkbox"/> REC /NWCC	<b>CDF:</b>
<b>Customer:</b>			<b>Last 4 SSN#:</b>
<b>Vendor</b>	<b>Course</b>		<b>MOED Cost Reimbursement:</b>
<b>Code:</b>	<b>Code:</b>		
<b>Tentative Start Date:</b>	<b>Tentative End Date:</b>	<b>Course:</b> <input type="checkbox"/> College Credit <input type="checkbox"/> Non-Credit/ Certificate	
<b>Tentative Start Date:</b>	<b>Tentative End Date:</b>		
<b>Did the customer apply for:</b> <input type="checkbox"/> Pell Grant <input type="checkbox"/> Student Loan <input type="checkbox"/> Scholarship <input type="checkbox"/> Other: _____ <input type="checkbox"/> Not Applicable			
<b>Training Provider Information</b>	<input type="checkbox"/> DLLR ETPL <input type="checkbox"/> Class Schedule <input type="checkbox"/> Description/ Cost <input type="checkbox"/> Acceptance Letter <input type="checkbox"/> Documentation of Cost Difference (Including Budget and Payment Plan Worksheet) <input type="checkbox"/> Justification for Training is complete in the MWE and verified.		
<b>Financial Verification</b>	<input type="checkbox"/> Pell Approval <input type="checkbox"/> Financial Statement from Vendor <input type="checkbox"/> Notarized Statement		
<b>Verified eligible for funding:</b> <input type="checkbox"/> WIOA Title I Adult <input type="checkbox"/> WIOA Title I Dislocated Worker <input type="checkbox"/> CIA <input type="checkbox"/> Other: _____			
<b>COMMENTS</b>			
<b>Budget Review</b> <input type="checkbox"/> Approved _____ Date: _____ <input type="checkbox"/> Not Approved _____ Date: _____			
<b>Reviewed by Supervisor:</b>			<b>Date:</b>
<b>Reviewed by Program Manager:</b>			<b>Date:</b>
<b>Compiled by Contracting:</b>			<b>Date:</b>
<b>To be completed by Contract Specialist:</b>			
<b>Information complete:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No – Returned to Center on _____ (date)			
<b>Fundware obligation number:</b> _____ <b>Date Task Order/ LOA issued:</b> _____			
<b>Funding for Training:</b> <input type="checkbox"/> WIOA Title I Adult <input type="checkbox"/> WIOA Title I Dislocated Worker <input type="checkbox"/> CIA <input type="checkbox"/> Other: _____ (Budget Account Number)			

**ATTACHMENT 5**

Date:

Obligation #:

XXXXX

School Name

School Address

Baltimore, Maryland 212XX

Dear Mr. /Mrs.:

This letter is authorization for the following customer to receive \_\_\_\_\_ 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 Date
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 at [dvandyke@oedworks.com](mailto: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 6**

<b>Vendor #:</b>		<b>Account:</b>	
<b>Name of Training Institution:</b>			
<b>Address of Training Institution: -</b>			
<b>Contact:</b>			
<b>Phone Number:</b>			
<b>PARTICIPANT:</b>		<b>S.S.#:</b>	<b>OB#</b>
<b>CAREER CENTER:</b>		<b>CDF Initials:</b>	
<b>TELEPHONE #:</b>			

TRAINING COURSE	COST PER COURSE	NO. OF DAYS/WK	NO. OF HRS/DAY	NO. OF 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:	
<b>TOTAL COST OF TRAINING:</b>	
PELL/Financial Aid Grant Amount (Specify):	(            )
<b>TOTAL COST OF COURSE AFTER ALL DEDUCTIONS</b>	

<p>REPORTING REQUIREMENTS: The training institution will issue the following periodic and final reports on standing: grade achievement, competency achievement, credentials, and performance appraisal on the dates indicated. Mail Reports to:</p>	

**SIGNATORY AUTHORITY:** The undersigned agree to the terms of This Agreement and commit their respective organizations to compliance with them.

<b>VENDOR:</b> Please type information	<b>MAYOR'S OFFICE OF EMPLOYMENT DEVELOPMENT</b>
<b>VENDOR NAME:</b>	<b>CONTRACTOR:</b>
<b>AUTHORIZED SIGNATURE/ DATE</b>	<b>AUTHORIZED SIGNATURE/ DATE</b>
<b>TITLE</b>	<b>TITLE:</b>

## Occupational Training Program Satisfaction Survey

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Primary: \_\_\_\_\_ Cell: \_\_\_\_\_

Hello, my name is \_\_\_\_\_ and I am calling on behalf of the Mayor's Office of Employment Development in reference to our training program that you attended. We are conducting a short survey to find out how Satisfied and Helpful the program was for you. The survey will only take about 5 minutes of your time and your responses are strictly confidential. Is this a good time?

Yes -Thank you Phone # use to reach client \_\_\_\_\_

No- What is a best time for me to call you back \_\_\_\_\_

Is this the best # to reach you? Yes No, New # \_\_\_\_\_

---

1. Overall, how satisfied were you with the assistance you received from your Career Development Facilitator (CDF) that assisted you in enrolling in training?

Very Satisfied      Satisfied      Somewhat Satisfied      Not Satisfied  
 If Somewhat or Not Satisfied, Why \_\_\_\_\_

2. My records indicate that you attended \_\_\_\_\_ for \_\_\_\_\_

3. Overall, how would you rate the training that you received?

Excellent      Good      Fair      Not Good      Poor  
 If Less than Good, Why \_\_\_\_\_

4. How would you rate your Training Instructor(s)?

Excellent      Good      Fair      Not Good      Poor  
 If Less than Good, Why \_\_\_\_\_

5. Did you complete the training? Yes      Still in training?      Did Not Complete

If No, did not complete, why not? \_\_\_\_\_

6. Did you receive a certificate when you completed the program (*some type of Certification*)?

Yes      No  
 If yes, what type of certificate/certification? \_\_\_\_\_

If no, were you told that you would receive a certificate? Yes      No

7. Are you currently employed? Yes      No



**Request for New Vendor**  
**Or Course for ITA**

Request 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 ERPL)

Request both **Provider and Course** be added to the MD LABOR ETPL list

Request **Course** be added to the MD LABOR ETPL list

Name of School: \_\_\_\_\_

Contact Person and Title: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Alternate Number: \_\_\_\_\_

List all courses to be considered: \_\_\_\_\_

Approved by Center Program Manager: (Initials) \_\_\_\_\_

Approved by ITA Liaison: (Initials) \_\_\_\_\_

Approved by Workforce Operations Division Director: (Initials) \_\_\_\_\_

All potential vendors must follow the instructions outlined in the MD Labor Policy Issuance 2017-09: WIOA Title I Training and Maryland's Eligible Training Provider List (ETPL) / October 26, 2017 for inclusion on the ETPL.

**Contracting Use: A vendor must complete steps 1-3 before approval will be granted by the Maryland Department of Labor**

1.  Has the vendor/ course been submitted to MD Labor for approval? <http://www.doit.state.md.us/selectsurvey/initialetpl>
2.  Once the initial approval has been made by MD Labor, did the vendor submit required application enclosures as outlined in the Policy Issuance
3. A  Does the vendor/ course possess a Certificate or Approval from the Maryland Higher Education Commission (MHEC)?  
[http://www.mhec.state.md.us/institutions\\_training/Documents/pcs/PCS\\_Training\\_Quest\\_082911.DOC](http://www.mhec.state.md.us/institutions_training/Documents/pcs/PCS_Training_Quest_082911.DOC)

B  If the vendor/ course do not possess a Certificate or Approval from the Maryland Higher Education Commission, do they possess a letter of exemption or “not regulated status” from MHEC?

C  If the vendor/ course do not possess a Certificate or Approval from the Maryland Higher Education Commission, do they possess a letter advising them that they must seek approval from the higher education authority in the home state where the out-of-state training provider is conducting training and included on the home state’s ETPL?

D  The course is for a Registered Apprenticeship and does not need MHEC approval

Final Approval by MD Labor for inclusion on ETPL

The vendor/ course have been approved by MD Labor and is on the ETPL list.

Approval Date: \_\_\_\_\_

Contract Agreement key milestones

Draft contract agreement has been completed by MOED

Date: \_\_\_\_\_

Final contract agreement has been negotiated

Date: \_\_\_\_\_

Contract has Been Approved by Baltimore City Board of Estimates

Date: \_\_\_\_\_

Workforce Operations Division Director and ITA Liaison have been notified that the vendor/ course is now accepting participants.

Date: \_\_\_\_\_

Recommended funding to support course: \_\_\_\_\_

Approved by Assistant Director Workforce Operations: (Initials) \_\_\_\_\_

Approved by Assistant Director/ Comptroller: (Initials) \_\_\_\_\_



**FISCAL POLICIES  
AND  
PROCEDURES  
FOR MONITORING  
SUBRECIPIENTS/ SUBCONTRACTORS**



Mayor's Office of Employment and Development  
Contracting and Compliance Unit  
417 E. Fayette Street, Suite 468  
Baltimore, Maryland 21202  
410-396-1910

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Appendix:

Fiscal Monitoring Introductory Letter (Sample).....  
Fiscal Monitoring Checklist.....  
Fiscal Monitoring Summary Letter (Sample).....  
Sub-Recipient Monitoring Checklist.....

*For providing professional or training services, the CITY shall pay the SUBCONTRACTOR on a cost- reimbursement basis, as reflected on the Board of Estimates (BOE) approved Monthly Project Invoice. Any expense/ costs incurred prior to the start or after the end date of the contract, or in excess of the amount shall be the sole responsibility of the SUBCONTRACTOR.*

## **PRIOR TO THE SUBMISSION OF INVOICES**

### *PROJECTIONS/ ACCRUALS*

The SUBCONTRACTOR shall maintain all fiscal records by the accrual accounting method. The SUBCONTRACTOR will ***contact the CITY by the “20th business day” of each month*** via electronic mail to inform the Contract Specialist of the SUBCONTRACTOR’S projected expenditures for the current month.

### *MANAGEMENT INFORMATION SYSTEM (MIS)*

The SUBCONTRACTOR shall submit all participant information (enrollment, placements, case notes, etc.) via the Management Information System (MIS) **prior to the submission of invoices** for payment on all invoices. The accuracy and timeliness of all data in the MIS is the responsibility of the SUBCONTRACTOR. It is also the responsibility of the SUBCONTRACTOR to collect, maintain, verify, and retrieve any back up documentation related to participant eligibility and performance standards of the Agreement.

Upon receipt of the Monthly Project Invoices, the Contract Specialist contacts each respective program’s MIS Unit to obtain an activity report to verify customer activity and reviews the back-up documentation provided by the SUBCONTRACTOR prior to approving all Monthly Project Invoices for payment. Payments shall not be made unless and/ or until the SUBCONTRACTOR has entered and MOED has verified all case notes and most recent participant information appear in the MIS.

The CITY reserves the right to refuse payment of invoices when data does not appear in the MIS within 31 calendar days. Failure to comply with these requirements by the stated deadlines is a breach of the Agreement.

## **PREPARING PROJECT INVOICES/ BACK UP DOCUMENTATION FOR SUBMISSION**

The SUBCONTRACTOR shall submit a properly completed BOE approved Monthly Project Invoice which reflects the approved line- item budget for payment to the CITY’s Contracting and Compliance Unit. A “properly completed” invoice contains allowable expenses, accurate calculations, and original signature of the BOE approved authorized representative. ***The (BOE approved) Monthly Project Invoice is due on the 15th business day of each month for the preceding month.***

The invoice should be accompanied by the required documentation referenced on the attached “Supporting (Back-Up) Documentation Matrix” to associate the expenses recorded on the invoice for which reimbursement is being requested. Invoice errors and/ or insufficient or missing documentation will result in delays in processing invoices and related payments. The CITY reserves the right to verify each line item before submitting the invoice to City Disbursements for payment.

The CITY will use its best efforts to release approved payment to the SUBCONTRACTOR within forty-five (45) calendar days from receipt of a properly completed invoice and the required supporting documentation.

LATE SUBMISSION OF INVOICES:

The SUBCONTRACTOR'S Monthly Project Invoices are to be submitted to the CITY in a timely manner, after services have been provided. If invoices are submitted 30 days or later (after the last due date the services have been rendered), then the CITY (at its discretion), shall have no obligation to pay for the stale invoice.

INVOICE ADJUSTMENTS/ RECONCILIATIONS

Disallowed Costs

If an internal or external monitoring or special audit determines that the Provider has expended funds which are questioned under the criteria set forth in the Budget Narrative and Monthly Project Invoice, the Provider will be notified by the City in writing and given the opportunity to justify the questioned expenditures if disallowed. Justifications will be reviewed for reconciliation and adjustments will occur on the succeeding invoice as appropriate.

**FISCAL DEADLINES/ MONTHLY DUE DATES:**

<b>Item:</b>	<b>Due Date:</b>
Estimates or Accrued Expenditures	20th Business Day of each month <i>(for the current month)</i>
Monthly Project Invoice and Supporting Documentation	15th Business Day of each month <i>(for the preceding month)</i>

Accrued Expenditures, Monthly Project Invoices and Supporting Documentation should be directed to the one of the following Contracting and Compliance Unit staff members:

Attention: Riley Grant, Contracting and Compliance Manager [rgrant@oedworks.com](mailto:rgrant@oedworks.com)  
Donna Van Dyke, Senior Contract Specialist [dvandyke@oedworks.com](mailto:dvandyke@oedworks.com)  
Deborah McClung, Contract Specialist [dmcclung@oedworks.com](mailto:dmcclung@oedworks.com)

Address: Mayor's Office of Employment Development  
Contracting and Compliance Unit  
417 East Fayette Street, Suite 468  
Baltimore, MD 21201

Phone: 410-396-1910, or 410-396-7336

Fax: 410-396-5219

## SUPPORTING (BACK-UP) DOCUMENTATION MATRIX

### REQUIRED SUPPORTING BACK-UP DOCUMENTATION AND FOLLOW-UP DOCUMENTATION

*(Please note: The line items below are a sample and may not be applicable to your BOE approved Budget)*

PROJECT INVOICE LINE ITEM	SUPPORTING BACK-UP DOCUMENTATION	FOLLOW-UP DOCUMENTATION
<b>ADMINISTRATIVE</b>	<i>(To be submitted with Monthly Invoices)</i>	<i>(To provide during Onsite Monitoring)</i>
PERSONNEL (Staff Salaries)	<input type="checkbox"/> Timesheets <input type="checkbox"/> Payroll Register/ Summary <input type="checkbox"/> Allocation of Hours ( <i>staff charging &lt; 100%</i> )  <i>(Required Verification: staff person's name, partial social security number, hourly pay, hours worked, deductions, gross and net pay.)</i>	<input type="checkbox"/> Copies of the cancelled checks returned from the bank as proof staff was paid.
FRINGE BENEFITS	<input type="checkbox"/> Same as above	
CONTRACTUAL	<input type="checkbox"/> Same as above	
TRAVEL/ TRANSPORTATION (STAFF ONLY) *Mileage *Parking/ Tolls *Fuel/ Gas	<input type="checkbox"/> Mileage Reports/ Parking, Gas, and Toll Receipts  <i>(Subcontractor will only be reimbursed at negotiated rates stipulated in the contract.)</i>	<input type="checkbox"/> Cancelled checks issued by the Subcontractor to the employee.
SUPPLIES (Office Items)	<input type="checkbox"/> Vendor invoice and receipt of payment made.  <i>(Order forms are not acceptable)</i>	<input type="checkbox"/> Cancelled checks or credit statement as proof Vendor was paid.
EQUIPMENT	<input type="checkbox"/>	<input type="checkbox"/>
FACILITIES (Rent and Utilities)	<input type="checkbox"/> A copy of the lease and copies of each check mailed to the landlord. <input type="checkbox"/> Copies of utility bills for the period invoiced.	<input type="checkbox"/> Copies of the credit statement or cancelled checks returned from the bank.
Insurance Payments	<input type="checkbox"/> Copies of the checks reflecting the premiums are current and are being paid.  <i>(Insurance payments must be current!)</i>	<input type="checkbox"/> Copy of actual insurance policies with MOED included (i.e., 3D, automobile, Employee Dishonesty, etc.).
Meetings/ Workshops *Food/ Beverage	<input type="checkbox"/> Copy of Meeting Agenda (to include purpose). <input type="checkbox"/> Sign In Sheet of Attendees <input type="checkbox"/> Vendor receipt of payment (caterer, bakery, etc.)	<input type="checkbox"/> Cancelled checks or credit statement as proof Vendor was paid.

PARTICIPANT COSTS	<i>(To be submitted with Monthly Invoices)</i>	<i>(To provide during Overt Monitoring)</i>
STIPENDS/ WAGES	<input type="checkbox"/> Payroll Registers <input type="checkbox"/> Attendance sheets during the pay period <input type="checkbox"/> Signed and dated time cards	<input type="checkbox"/> Copies of the cancelled checks returned from the bank and if applicable <input type="checkbox"/> W-2 Forms for the independent Payroll Company managing client payroll <input type="checkbox"/> Work permits should be presented (if applicable) upon request for students
INCENTIVES *Bus Passes/ *Bus Tokens *Gift Cards	<input type="checkbox"/> Bus Pass/Token/Voucher Logs indicating the customer's name, ssn, serial number or other identifier on the bus pass/voucher as proof of distribution and receipt. <input type="checkbox"/> Receipt of Gift Card purchase and log indicating the customer's name and date as proof of distribution and receipt  <i>(SUBCONTRACTORS are reimbursed for what has been disbursed, not what is purchased!)</i>	<input type="checkbox"/> Copies of the cancelled checks and adjusted (if appropriate) invoices from the Mass Transit Administration or retail store providing tokens/ vouchers.
SUPPLIES *Eligibility Costs *Books/ Tools *Tests/Certifications *Uniforms	<input type="checkbox"/> Vendor receipt of payment for drug screenings, background checks, I.D.'s, GED/ Certification prep materials, tests or application fees, tools, uniforms, and supplies as negotiated in your contract. <input type="checkbox"/> Participant attendance logs/ vendor rosters	<input type="checkbox"/> Cancelled checks or credit statement as proof Vendor was paid.
3rd PARTY SERVICE CONTRACTS *Training/ Workshops *Case Management	<input type="checkbox"/> Vendor invoices/ receipts of payment with description of services rendered (to include hourly rates, time reports, and participant attendance logs).	<input type="checkbox"/> Cancelled checks or credit statement as proof 3rd Party Vendor was paid. <input type="checkbox"/> 3rd Party Contract (signed/ dated) <input type="checkbox"/> Sample of monitoring/ fiscal oversight

OTHER	<i>(To be submitted with Monthly Invoices)</i>	<i>(To provide during Overt Monitoring)</i>
ADMINISTRATIVE *10% of Direct costs		
PROCUREMENT *Goods and services	<p>Adhere to the following purchasing thresholds, request prior permission, and provide the back-up documentation as referenced:</p> <ul style="list-style-type: none"> <li>• <b>Purchases over \$250.00</b> Document at least two (2) verbal price quotations from two viable sources in order to determine price reasonableness. Indicate names of Vendors, date called, individual providing quote and the amount of each quote on Subcontractor/vendor letterhead.</li> <li>• <b>Purchases \$251.00 - \$999.00</b> Document at least three (3) written quotations from three viable sources.</li> <li>• <b>Purchases \$1,000.00+</b> Requires prior written approval from the MOED Program Manager. Secure at least three (3) written quotations (at least one (1) quotation must be solicited from a minority/woman owned business). Attach a copy of the letter authorizing purchase from the MOED Program Manager and/or Fiscal Analyst.</li> </ul>	<p>A cancelled check and the Vendor invoice must be provided upon request.</p>

## **ONSITE AND REMOTE MONITORING**

MOED is responsible for monitoring the programmatic and financial activities of its SUBCONTRACTORS in order to ensure proper stewardship of Workforce Innovation Opportunity Investment Act (WIOA) and other grantor funds. In addition to achieving performance goals, SUBCONTRACTORS must comply with Federal and State laws, regulations, and provisions of any agreements that govern grant awards.

The MOED Contracting and Compliance Unit and the applicable MOED Workforce Services Delivery Unit share the responsibility of monitoring the SUBCONTRACTORS progress toward delivering services in compliance with terms and conditions of their Agreement. MOED will review invoices, identify and follow up on questionable expenditures where necessary, maintain documentation of monitoring efforts, review the results of any related findings, and develop or request corrective action plans.

### *ONSITE and REMOTE MONITORING SCHEDULE*

MOED will conduct at least one (1) onsite monitoring visit per year to evaluate compliance with applicable regulations, the appropriateness of administrative systems and operational processes and procedures. Remote monitoring protocols will be implemented if necessary. Other factors may be considered when deciding the frequency of monitoring visits, to include: the relative term and monetary value of the award, the amount of documentation to submit with monthly project invoices, current and prior experience with MOED, the complexity of the award, sensitivity of the work, scope of governing regulations, and the proficiency level of the administrative or fiscal team. SUBCONTRACTORS not subject to Circular A-133 audits may require additional monitoring to ensure compliance, including requesting audited financial statements and/ or completion of a financial controls questionnaire.

SUBCONTRACTORS will be contacted by the MOED Workforce Services Unit to schedule an onsite monitoring visit, followed by an entrance letter detailing agenda items, attendees, and any preparation requests. Whenever possible, the onsite monitoring visit will include a review of programmatic and fiscal performance. On occasions when a comprehensive review cannot occur, SUBCONTRACTORS will be contacted by the MOED Contracting and Compliance Unit to schedule a separate fiscal review.

### *PERFORMANCE MONITORING*

Performance may be measured on a weekly, monthly, quarterly and/or cumulative basis against goals incorporated within the Agreement. MOED will use a standardized Onsite Monitoring Checklist as a guide during the visit that will facilitate on-site discussions with administrative and fiscal personnel, current and former participants, and in some cases, interviews with employers.

Areas of Programmatic Monitoring shall include, but not limited to:

- A. Achievement of performance goals;
- B. Quality and effectiveness of participant's counseling, assessment, follow-up and job placement plan;
- C. SUBCONTRACTOR'S compliance with referral procedures;
- D. SUBCONTRACTOR'S accuracy in determining and verifying eligibility;
- E. Quality and scope of onsite training, workshops and GED curriculum and instruction;
- F. Compliance with promptness and accuracy in the submission of MIS;
- G. Compliance with all regulations and Agreement obligations (staffing inventory, reporting requirements, audits, and procurement).

Areas of Fiscal Monitoring shall include, but not limited to a review of:

- A. All 3rd Party Agreements;
- B. Relevant consultant and SUBCONTRACTOR invoices;
- C. Most recent A-133 Audit Report or audited financial statements;
- D. Insurance Policy is current and compliant with terms of MOED Agreement/ payment receipts;
- E. Cash journal/ reconciliation statements;
- F. Office supply backup documentation;
- G. Timeliness and accuracy of invoices;
- H. Payroll summary sheets/ time distribution records;
- I. Personnel files contain up to date resume and evaluation.

MOED will work with SUBCONTRACTORS to correct any inefficiencies, error, or policies and procedures not in compliance with federal or state regulations. As part of the monitoring activities, we may identify findings that require a Corrective Action Plan to correct a deficiency in the way you are managing your grant. In this case a letter may be sent detailing the finding and asking for a Corrective Action Plan to be completed and submitted to the requestor within 30 days from the date of the letter.

**Appendix Follows:**

**SAMPLE MONITORING LETTER**

Date  
Name, Title  
Organization  
Address  
City, State, Zip

Re: Fiscal Monitoring  
Award: FY20 Workforce Innovation and Opportunity Act (WIOA) Youth Agreement  
Period: October 1, 2019 – September 30, 2020

Dear Name:

In accordance with the Maryland Department of Labor (MDOL) and your contract, the Mayor's Office of Employment Development (MOED) is responsible for monitoring sub recipients during the contract award period. The Contracting and Compliance Department of MOED would customarily conduct an on-site monitoring visit in person. However, due to the Corona Virus pandemic, we will adhere to safety precautions for now and conduct an off-site desk review, followed by a virtual meeting for the Award and Period referenced above.

The purpose of this fiscal monitoring is to review your organization's internal control systems, ensure proper management of the award, and to verify expenditures.

- 1.) Please respond to the items below and provide electronic copies of the documents (preferably in one email) as requested on the attached page to Name via email (Name@oedworks.com) on or before Date, Date, 2020.
  - Fiscal/accounting records maintained by the program
  - Name of the Commercial Accounting System used
  - Name and Type of Books or Journals Being Maintained (e.g. Check Register, General Ledger, Voucher Register)
  - Name and title of the individual who reconciles bank statements
  - Name and title of person who has check signing authority and a copy of a bank reconciliation for the months of March 2020 through April 2020 referencing the contract funds received and deposited
- 2.) Please provide two (2) dates and times during the week of Day, Date, 2020 through Day, Date, 2020 that you are available to join a virtual meeting or conference call to discuss your submission and next steps. The meeting shouldn't take more than 90 minutes.

Once we are able to perform an actual on- site visit we will need to see the location where all records are secured. We will also be looking to verify the "Equal Opportunity is the Law" poster is displayed. We thank you in advance for preparing and planning to be available for this monitoring of contractual responsibilities. If you have any concerns you would like to discuss, feel free to contact me at dmcclung@oedworks.com

Sincerely,

Name

Contract Specialist, MOED

CC: Name, Director of Finance, Organization  
Name, Assistant Director, MOED  
Name, Youth Administrator, MOED  
Name, Comptroller, MOED  
Name, Contracting and Compliance Manager, MOED

## SAMPLE MONITORING SUMMARY LETTER

Date

Contact Name

Title

Organization

Street, Suite

City, State, Zip Code

Re: Fiscal Monitoring  
Award: FY20 Workforce Innovation and Opportunity Act (WIOA) Youth Agreement  
Period: October 1, 2019 – September 30, 2020

Dear Name:

An on-site fiscal monitoring visit of Name of Organization was completed on Date at your place of business at Street Address, City, State. The monitoring was facilitated by Mayor's Office of Employment Development (MOED) staff members Name, Name, and Name. The Name of Organization staff member present was Name.

The MOED monitoring staff noted a number of documents that were not available for in-person review on Date and asked Organization Staff Member to provide copies to MOED. Those copies were hand delivered to MOED on Date.

### Fiscal Monitoring Summary

#### **Violations of agreement terms (Findings):**

None

#### **Concerns to be addressed:**

**Organization does not routinely submit invoices on the 15<sup>th</sup> of the month.** MOED considers timely submission of invoices critical to ensuring that our vendors and subcontractors are paid correctly and with regularity. Please make note of the due dates for the invoices related to each contract and alert the appropriate MOED contract specialist if an invoice will be submitted late.

**Organization does not have written policies related to the oversight and monitoring of their third-party subcontractors.** MOED has discovered that effective oversight of third parties ensures that all contractually mandated fiscal and performance goals are timely met. The Vendor states they manages its third-party agreements on a contract by contract basis. This is understandable, but the best practice would be for an organizational policy to exist that outlines the process for monitoring all third-party subcontractors. Please consider adopting such a policy.

**Organization does not always submit invoices and payroll documentation with the signature of the Executive Director.** MOED staff made note that some invoices and payroll documentation submitted were not signed by the Executive Director. Please note that all monthly invoice sheets, and any payroll materials submitted with them, should be signed by the Executive Director of the organization.

#### **Conclusion:**

For each of the three agreements noted above, **Organization** submits invoices that convey appropriate expenditures supported by acceptable documentation. These expenditures are in line with the expectations outlined in the approved budgets contained in the above noted agreements. No violation of the terms of these agreements was noted by MOED staff.

*However, the concerns listed above should be addressed by **Organization** staff as soon as possible. Although these concerns do not rise to the level of actual findings of a contractual violation, it is important that they not be overlooked. If you have any questions as to how MOED can assist with addressing these issues, please do not hesitate to contact me at 410-396-1910 or [name@oedworks.com](mailto:name@oedworks.com)*

Sincerely,

Name  
Contract Specialist, MOED

CC: [Name](#), Director of Finance, Organization  
Name, Assistant Director, MOED  
Name, Youth Administrator, MOED  
Name, Comptroller, MOED  
Name, Contracting and Compliance Manager, MOED

**EQUAL OPPORTUNITY**  
**COMPLAINT, MEDIATION and GRIEVANCE**  
**PROCEDURES**

**FOR**

**PROGRAM**

**PARTICIPANTS/EMPLOYEES/SUB-RECIPIENTS**

Baltimore City  
MAYOR'S OFFICE OF EMPLOYMENT DEVELOPMENT

# MAYOR'S OFFICE OF EMPLOYMENT DEVELOPMENT

## GRIEVANCE POLICY AND PROCEDURE

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### I. PHILOSOPHY

This grievance procedure is concerned with the protection of the rights, privileges and prerogative of the program and participants, employees, subrecipients 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 subrecipients. The MOED has established procedures for resolving disagreements among the parties to any compliant which allege a violation of the Workforce Innovation and Opportunity Act, 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 Development 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) "WIOA" means the Workforce Innovation and Opportunity Act

- F) "Participant" means a person enrolled in a program funded through MOED
- G) "Subrecipient" means any person, organization, or entity which received funds through MOED
- H) "EEO" means MOED's Equal Opportunity Officer
- I) "Immediate Supervisor" means any instructor for training participants or the actual agency or worksite supervisor for work-related participants
- J) "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
- K) "Filing a Complaint" means the act of writing down the complaint and presenting it to the MOED or its subrecipients in accordance with this procedure
- L) "Secretary" means the Secretary of the United States' Department of Labor
- M) "Complainant" means the person(s) or organization(s) filing a complaint of alleged discrimination or for whom the complaint is filed
- N) "Respondent" means the individual, program or activity against whom a complaint is filed

### 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 MD Labor 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 MD Labor review by filing a request with MD Labor within 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. MD Labor 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 DHS. 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 Innovation and Opportunity Act, 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 Area is required to adopt and publish procedures for processing complaints alleging discrimination against any program or activity funded or authorized under WIOA 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 WIOA 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 WIOA)
- 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 filed 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, address, and telephone number (or other means of contacting the complainant);
- ii) Full name, address, and telephone number of person/agency that complaint is about;
- 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 WIOA.

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 Form <https://www.dol.gov/oasam/programs/crc/filing-complaint.htm>

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:

**Patricia Morfe**

MOED Director of Policy & Planning  
417 E. Fayette Street, Suite 468  
Baltimore, MD 21202  
(410) 396-1261

**Myisha Dixon Henry**

MOED HR Director  
417 E. Fayette Street, Suite 468  
Baltimore, MD 21202  
(410) 396-1910

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 filed 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 filed 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.
  - For other good 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 WIOA 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 than 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:

<input type="checkbox"/> <b>YES</b>	<b>I elect to avail myself of the Mediation option of complainant resolution. I agree to participate in the Mediation efforts led by the Office of Equal Opportunity and program Equity and to attempt to settle the issue(s) in dispute between the Respondent and me.</b>
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<input type="checkbox"/> <b>NO</b>	<b>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.</b>
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Complainant: \_\_\_\_\_ Date: \_\_\_\_\_

Witness: \_\_\_\_\_ Date: \_\_\_\_\_

**Mayor's Office of Employment Development**  
417 E. Fayette Street, Suite 4468  
Baltimore, MD 21202  
Telephone: (410) 396-1790  
Website: <http://www.oedworks.com>

## **COMPLAINT, MEDIATION and GRIEVANCE PROCEDURE**

**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 Officer, following the steps outlined in the COMPLAINT, MEDIATION and GRIEVANCE PROCEDURES.**

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Witness: \_\_\_\_\_

Date: \_\_\_\_\_

## Equal Opportunity and Non-Discrimination Notice

To Job seekers, Workforce Innovation and Opportunity Act (WIOA) applicants, participants, staff, sub-recipients, and other interested parties; you have the right to file a complaint if you feel that a violation of the Workforce Innovation and Opportunity Act, regulations, grants or other agreements has had an adverse effect on you.

All complaints must be submitted, in writing, within one year of the alleged violation and must contain the following information: 1) Full name, address, and telephone number of person filing complaint; 2) Full name, address, and telephone number of person/agency that complaint is about; 3) Clear and concise statement of facts and dates describing the alleged violation; 4) The provision(s) of the law, regulations, grant, or other agreement believed to have been violated; 5) Grievances or complaints about individuals must indicate how the individual did not comply with the law, regulations, or contract; and 6) The remedy sought by the person filing.

The Local Area shall notify all parties of the opportunity to informally resolve the complaint. If the complaint is not resolved informally, the complainant has the right to a hearing within 30 days of filing the complaint. All parties will receive written notice of the hearing at least 10 days prior to the hearing date.

A written decision will be mailed to all parties within 90 days of the date the complaint was filed.

If a complainant does not receive a written decision within 90 days, or is not satisfied with the decision received, the complainant may file an appeal. The request for an appeal must be submitted, in writing, to:

Maryland Department of Labor's Office of Equal Opportunity and Program Equity (OEOPE) located at 500 North Calvert Street, Baltimore, Maryland 21202 (or the person whom MD Labor has designated for this purpose); or the Director, Civil Rights Center (CRC), U.S. Department of Labor (DOL), 200 Constitution Avenue NW, Room N-4123, Washington, DC 20210.

### Equal Opportunity is the law

It is against the law for this recipient of federal financial assistance to discriminate on the following basis:

- Against any individual in the United States, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief; and
- Against any beneficiary of programs financially assisted under Title I of the Workforce Innovation and Opportunity Act (WIOA), on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his or her participation in any WIOA Title I-financially assisted program or activity.

The recipient must not discriminate in any of the following areas:

- Deciding who will be admitted, or have access, to any WIOA Title I-financially assisted program or activity;
- Providing opportunities in, or treating any person with regard to, such a program or activity; or
- Making employment decisions in the administration of, or in connection with, such program or activity.

### What to do if you believe you have experienced discrimination

If you think that you have been subjected to discrimination under a Workforce Innovations and Opportunity Act Title I-financially assisted program or activity, you may file a complaint within 180 days from the date of the alleged violation with either:

- The recipient's Equal Opportunity Officer (for the Mayor's Office of Employment Development, Patricia Morfe, . 417 E Fayette Street Room 468. Baltimore, MD 21202); or The Director, Civil Rights Center (CRC), U.S. Department of Labor, 200 Constitution Ave. NW, Room N-4123, Washington, DC 20210.

If the recipient does not give you a written Notice of Final Action within 90 days of the day on which you filed your complaint, you do not have to wait for the recipient to issue that Notice before filing a complaint with CRC. However, you must file your CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which you filed your complaint with the recipient).

If the recipient does give you a written Notice of Final Action on your complaint, but you are dissatisfied with the decision or resolution, you may file a complaint with CRC utilizing the Complaint Information Form via US mail, email: [CRCEXternalComplaints@dol.gov](mailto:CRCEXternalComplaints@dol.gov); phone at 202-693-6500, or TTY/TRS 1-800-877-8339. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action.



## **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.

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Signature

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Date

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Organization