

UPPERSHORE
WORKFORCE
INVESTMENT
BOARD



UPPER SHORE WORKFORCE AREA

Workforce Innovation and Opportunity Act
Combined Plan

Workforce Innovation and Opportunity Act
Combined Plan 2020 - 2024

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Section 1: Economic Analysis

Some information in this section reflects the impact of Covid-19, Governor Hogan's Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic impact of COVID-19 in the out years of this plan is unknown.

Data in the Economic Analysis section of the Upper Shore plan is from Chmura JobsEQ Economic Overview Report unless otherwise cited.

Demographic Profile

The population in the Upper Shore - 5 Counties was 171,295 per American Community Survey data for 2014-2018. According to the Maryland Geological Survey, there are 2016.38 square miles of land and water in the Upper Shore Counties- Caroline, 324.39 square miles; Dorchester, 660.97 square miles; Kent, 303.64 square miles; Queen Anne's, 401.06 square miles; Talbot 326.32 square miles. The United States Department of Agriculture Economic Research Service (USDA ERS) delineates an area as rural if the population per square mile is less than 500 people. The Upper Shore population per square mile (171,295 people divided by 2016.38 square miles) is 84.95. By the USDA ERS definition, the Upper Shore is rural.

Net Natural Change, a measure of births minus deaths, for Maryland counties is available from the Population Division of the United States Census Bureau, release date March 26, 2020. This data as prepared by the Maryland Department of Planning for the period 4/1/10 – 7/1/19, indicates that the Upper Shore had a net natural change of -819, that is, there were 819 more deaths than births during the period.

The median age for the Upper Shore counties is 45.2 years. The median age for the State of Maryland is 38.6 years. The median age for the United States is 37.9 years.

The region has a civilian labor force of 88,027 with a participation rate of 63.0%. Of individuals 25 to 64 in the Upper Shore - 5 Counties, 28.7% have a bachelor's degree or higher which compares with 32.9% in the nation.

The median household income in the Upper Shore - 5 Counties is \$67,450 and the median house value is \$276,090.

Employment Trends

As of 2020Q2, total employment for the Upper Shore - 5 Counties was 68,247 (based on a four-quarter moving average). Over the year ending 2020Q2, employment declined 12.5% in the region.

Unemployment Rate

The unemployment rate for the Upper Shore - 5 Counties was 5.3% as of November 2020. The regional unemployment rate was lower than the national rate of 6.4%. One year earlier, in November 2019, the unemployment rate in the Upper Shore - 5 Counties was 3.2%.

Wage Trends

The average worker in the Upper Shore - 5 Counties earned annual wages of \$43,109 as of 2020Q2. Average annual wages per worker increased 2.2% in the region over the preceding four quarters. For comparison purposes, annual average wages were \$58,849 in the nation as of 2020Q2.

Cost of Living Index

The Cost-of-Living Index estimates the relative price levels for consumer goods and services. When applied to wages and salaries, the result is a measure of relative purchasing power. The cost of living is 10.0% higher in Upper Shore - 5 Counties than the U.S. average.

Industry Snapshot

The largest sector in the Upper Shore - 5 Counties is Health Care and Social Assistance, employing 8,775 workers. The next-largest sectors in the region are Retail Trade (8,126 workers) and Accommodation and Food Services (7,224). High location quotients (LQs) indicate sectors in which a region has high concentrations of employment compared to the national average. The sectors with the largest LQs in the region are Agriculture, Forestry, Fishing and Hunting (LQ = 2.64), Construction (1.35), and Accommodation and Food Services (1.26).

Sectors in the Upper Shore - 5 Counties with the highest average wages per worker are Finance and Insurance (\$72,377), Utilities (\$68,838), and Management of Companies and Enterprises (\$68,557). Regional sectors with the best job growth (or most moderate job losses) over the last 2 years are Construction (+352 jobs), Administrative and Support and Waste Management and Remediation Services (+302), and Manufacturing (+287).

Over the next 2 years, employment in the Upper Shore - 5 Counties is projected to contract by 222 jobs. The fastest growing sector in the region is expected to be Health Care and Social Assistance with a +0.7% year-over-year rate of growth. The strongest forecast by number of jobs over this period is expected for Health Care and Social Assistance (+117 jobs), Construction (+49), and Accommodation and Food Services (+45).

Occupation Snapshot

The largest major occupation group in the Upper Shore - 5 Counties is Office and Administrative Support Occupations, employing 7,529 workers. The next-largest occupation groups in the region are Sales and Related Occupations (6,914 workers) and Food Preparation and Serving Related Occupations (6,545). High location quotients (LQs) indicate occupation groups in which a region has high concentrations of employment compared to the national average. The major groups with the largest

LQs in the region are Farming, Fishing, and Forestry Occupations (LQ = 1.89), Building and Grounds Cleaning and Maintenance Occupations (1.31), and Construction and Extraction Occupations (1.20).

Occupation groups in the Upper Shore - 5 Counties with the highest average wages per worker are Management Occupations (\$95,700), Legal Occupations (\$88,600), and Architecture and Engineering Occupations (\$82,200). The unemployment rate in the region varied among the major groups from 1.6% among Legal Occupations to 9.1% among Personal Care and Service Occupations.

Over the next 2 years, the fastest growing occupation group in the Upper Shore - 5 Counties is expected to be Healthcare Support Occupations with a +1.1% year-over-year rate of growth. The strongest forecast by number of jobs over this period is expected for Food Preparation and Serving Related Occupations (+60 jobs) and Healthcare Support Occupations (+60). Over the same period, the highest separation demand (occupation demand due to retirements and workers moving from one occupation to another) is expected in Food Preparation and Serving Related Occupations (2,305 jobs) and Sales and Related Occupations (1,939).

Industry Clusters

A cluster is a geographic concentration of interrelated industries or occupations. The industry cluster in the Upper Shore - 5 Counties with the highest relative concentration is Food Mfg. with a location quotient of 2.95. This cluster employs 2,352 workers in the region with an average wage of \$36,102. Employment in the Food Mfg. cluster is projected to contract in the region about 0.7% per year over the next ten years.

Education Levels

Expected growth rates for occupations vary by the education and training required. While all employment in the Upper Shore - 5 Counties is projected to contract 0.2% over the next ten years, occupations typically requiring a postgraduate degree are expected to grow 0.3% per year, those requiring a bachelor's degree are forecast to contract 0.1% per year, and occupations typically needing a 2-year degree or certificate are expected to grow 0.1% per year.

Gross Domestic Product

Gross Domestic Product (GDP) is the total value of goods and services produced by a region. In 2019, nominal GDP in the Upper Shore - 5 Counties expanded 3.9%. This follows growth of 4.7% in 2018. As of 2019, total GDP in the Upper Shore - 5 Counties was \$6,874,360,000.

Of the sectors in the Upper Shore - 5 Counties, Real Estate and Rental and Leasing contributed the largest portion of GDP in 2019, \$859,116,000. The next-largest contributions came from Manufacturing (\$796,202,000); Health Care and Social Assistance (\$620,443,000); and Retail Trade (\$549,399,000).

Commuting Patterns

The United States Census Bureau Longitudinal Employer Household Dynamic (LEHD) data is pertinent to any economic analysis of the Upper Shore region. The Upper Shore is a net outflow region. The LEHD

data indicates that in 2018, more workers left the region to work than “stayed at home” in the region to work.

The chart below provides the data from LEHD.

Inflow/Outflow Report		
Selection Area Labor Market Size (All Jobs)		
	2018	
	Count	Share
Employed in the Selection Area	61,449	100.0%
Living in the Selection Area	81,838	133.2%
Net Job Inflow (+) or Outflow (-)	-20,389	-
In-Area Labor Force Efficiency (All Jobs)		
	2018	
	Count	Share
Living in the Selection Area	81,838	100.0%
Living and Employed in the Selection Area	40,413	49.4%
Living in the Selection Area but Employed Outside	41,425	50.6%
In-Area Employment Efficiency (All Jobs)		
	2018	
	Count	Share
Employed in the Selection Area	61,449	100.0%
Employed and Living in the Selection Area	40,413	65.8%
Employed in the Selection Area but Living Outside	21,036	34.2%
Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2018).		

The Way Forward

“Job-driven education and training programs should increase their focus on earning credentials based on demonstrated skills rather than simply time spent in a classroom.” Ready to Work: Job-Driven Training and American Opportunity; Report to the President July 2014

Engaging Employers

Work up-front with employers to determine local hiring needs and design training programs that are responsive to those needs, from which employers will hire. The USWIB will participate in Program

Advisory Groups for trainings listed on the Eligible Training Provider List. The USWIB will function as the Local Advisory Council for Career and Technology Education.

Earn and Learn.

The USWIB will explore work-based learning opportunities with employers – on-the-job training, internships, pre-apprenticeships, and Registered Apprenticeships – as training paths to employment.

Smart Choices

The USWIB will use all Labor Market Information tools available to it to make better use of data to drive accountability, inform what programs are offered and what is taught, and offer user-friendly information for job seekers to choose programs and pathways that work for them.

Measuring Matters

The USWIB will use the performance standards that accompany WIOA funding to measure and evaluate employment and earnings outcomes.

Steppingstones

The USWIB will use career pathways to promote a seamless progression from one educational steppingstone to another, and across work-based training and education, so individuals' efforts result in progress.

Opening Doors

The USWIB will work to eliminate barriers to accessing job-driven training and hiring for any American who is willing to work, including access to supportive services and relevant guidance.

Regional Partnerships

The USWIB will coordinate American Job Centers, local employers, education and training providers, economic development agencies, and other public and private stakeholders, to effectively and efficiently use limited resources.

USWIB Priorities

As the Workforce Innovation and Opportunity Act Title I grant recipient, the USWIB will prioritize those industries and occupations that require skills and credentials that can be gained through use of the Eligible Training Provider List. As the USWIB identifies opportunities for skilled and credentialed employment opportunities, it will work with employers to determine local hiring needs and work with training providers to design training programs that are responsive to those needs.

Economic Analysis Conclusions

The Upper Shore economy as defined by the Gross Domestic Product is characterized by real estate sales and leasing, services, manufacturing, and retail trade.

Section 2: Strategic Planning to Maximize the Earning Capacity of Marylanders

Some information in this section reflects the impact of Covid-19, Governor Hogan's Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic, social, labor market, and service delivery impact of COVID-19 in the out years of this plan is unknown.

The USWIB strives to ensure that the region has an educated and skilled workforce and that employers have a supply of skilled workers. The USWIB vision aligns with Governor Hogan's Benchmarks of Success by addressing the first four strategies:

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

Demand Side of the Employment Equation

An analysis of 3,029 online job ads by Chmura JobsEQ provides insight into the knowledge and skills that Upper Shore employers require.

The 3,029 job ads list the following as the most occurring occupations: Retail Salesperson, 309 ads; Heavy and Tractor Trailer Truck Drivers, 169 ads; First Line Supervisors of Retail Sales Workers, 150 ads; Stockers and Order Fillers, 150 ads; Registered Nurses, 119 ads; First Line Supervisors of Food Preparation and Service Workers, 86 ads.

The 3029 job ads list 91 certifications with the most occurring certifications: Commercial Driver License, 80 ads; Registered Nurse, 69 ads; Certified Nursing Assistant, 49 ads; Medical Assistant, 12 ads.

The 3029 job ads list 96 soft skills with the most occurring skills: Verbal and Written Communication 1303 ads; Customer Service 790 ads; Cooperative/Team Player 725 ads; ability to Work Independently, 539 ads.

It is easy to conclude from the analysis of the 3029 job ads, that soft skills are the essential skills required for employment at any level. The USWIB will work with training vendors to ensure that soft/essential skills are included in training programs. The USWIB will make information available to any Partner on the skill requirements demanded by employers from the Chmura JobsEQ analytics tool. Any Partner can request and will be granted any information that the USWIB has related to employer wants and needs for employees.

The USWIB will work with training vendors to communicate the needs of employers so that those needs can be “designed” into training programs.

Supply Side of the Employment Equation

Chmura JobsEQ, through an Occupation Gap analytical tool provides information on projected workforce shortages and overages over the next three years. The Occupation Gap tool indicates that the Upper Shore will see a shortage of Healthcare Practitioners and Technical Occupations and an overage of Food Preparation and Serving Workers.

The challenge for the USWIB, American Job Center Partners, and other workforce development stakeholders will be engaging those with barriers to employment and preparing those workers with hard and essential skills to be viable candidates for jobs in the shortage occupations. The USWIB will work to coordinate its efforts as the Local Workforce Development Board and WIOA Title I recipient with American Job Center Partners and other workforce development stakeholders to communicate and address employer needs. The USWIB will build a collaborative workforce system response by requiring its One Stop Operator to be an information and referral resource for workforce partners and a professional development convener for the workforce system. Each workforce partner brings expertise to its mission and service target group, so the most efficient and effective workforce system recognizes that the expertise of all partners is valuable, particularly when those with barriers to employment are a system focus.

The USWIB recognizes the subject matter expertise of workforce partners in working with those with barriers to employment according to the chart below.

Barrier	Subject Matter Expert
Displaced Homemaker	Title I Program Director
Migrant and Seasonal Farmworker	Labor Exchange Administrator
Ex-Offenders	Labor Exchange Administrator
Individual Facing Cultural Barrier	Title II Program Director
Individual with Disabilities	Title IV Area Director
Youth with Disabilities	Title IV Area Director

Individual within 2 years of exhausting lifetime eligibility for Social Security Act Part A	Department of Social Services Directors
Individual who is an English language learner	Title II Director
Individual who is unemployed	Labor Exchange Administrator
Individual who is long term unemployed	Labor Exchange Administrator
Individual who has a low level of literacy	Title II Program Director
Individual without a high school diploma	Title II Program Director
Low-income Individual, including SNAP and TANF Recipients	Department of Social Services Director
Native Americans, Alaska Natives, Native Hawaiians	Native American Job Training Program Operator
Older Individuals	Labor Exchange Administrator; SCSEP Operator
Single Parents (including single pregnant women and non-custodial parents)	Department of Social Services Director
Veterans	Jobs for Veterans State Grant Lead Worker
Youth who are in or have aged out of the Foster Care system	Department of Social Services Director

A subject matter expert may or may not be a service provider for an individual, the USWIB views a subject matter expert as a resource to be called upon when programs are designed, grants are applied for or employers need information on successful strategies for those with a barrier to employment.

- B. 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.

A compelling data point for the implementation and effectiveness of employment and training activities is the Labor Force Participation Rate and the ongoing strategic analysis of who is not participating in the labor force and why. A Labor Force Participation Rate analysis assists in targeting

American Job Center Partner resources to the job seekers who are not in the labor force with the objective of getting the disengaged to engage.

Demographic Group	Upper Shore Labor Force Participation Rate	Maryland Labor Force Participation Rate	United States Labor Force Participation Rate
All, 16 years and over	63.0%	67.6%	63.2%
Prime Age, 25-54 years	84.4%	85.8%	81.8%
Veterans, 18-64 years	83.8%	82.9%	76.3%
With a Disability, 18-64 years	48.6%	47.8%	41.6%

Source Chmura JobsEQ

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

The data in the table on the next page is based on the occupational training offerings listed on the Workforce Innovation and Opportunity Act Eligible Training Provider List (ETPL) for Chesapeake College. As this plan is written, Chesapeake College is the only WIOA Eligible Training Provider in the Upper Shore area. Customers must use the ETPL when selecting a training program that qualifies for WIOA training funds. Customers may choose any training on the ETPL and are not limited to the local area. If a customer is willing to travel for training, they may do so, and they may choose a training program delivered outside the Upper Shore area.

The USWIB strictly interprets and enforces the customer choice provisions in WIOA and its regulations. Specifically, if a customer is eligible, selects a training from the ETPL and the USWIB has Title I funding, an Individual Training Account must be established for the customer.

Chesapeake College Eligible Training Provider List Program Name	Is the Industry Projected to Grow in the Upper Shore? (Chmura JobsEQ Data)
Administrative Medical Assistant	Yes
CDL Bus Training	Yes
Certified Nursing Assistant	Yes*
Childcare	Yes
Clinical Medical Assistant	Yes
Commercial Driver License Prep	Yes*
Dental Assisting	Yes
Drafting	No
EMT-Paramedic	Yes
Expanded Function Dental Assisting	Yes
Food Service Management	Yes

Hotel/Resort Management	Yes
HVAC-R Technician	Yes
Marine Services Technician Training	Yes
Medical Coding Professional	Yes
Pharmacy Technician Exam Prep	Yes
Phlebotomy	Yes
Radiological Sciences	Yes
Surgical Tech	Yes
Welding	Yes
	Source: Chmura JobsEQ *: indicates an Industry where growth is attributable to exits rather than growth.

The strength of the employment and training network is its collaboration and communication model in the Upper Shore counties. Providing an American Job Center face-to-face opportunity for both employers and job seekers at least one day per week in each of the five counties in the Upper Shore, including a successful branding and social media campaign, has allowed an expansion of outreach and promotion that is driving customers to the American Job Center resources. Note: During the COVID-19 pandemic and Governor Hogan's Emergency Order, all Partners have established virtual information and referral services.

The USWIB, however, recognizes the challenges of a rural area:

- Population and demographics of available workers.
- Lack of available, reliable, and timely transportation for employment
- Access and affordability of child and adult care resources.
- Access to broadband internet.

To mitigate transportation challenges, the USWIB and its WIOA staff are incorporating new data analysis via Chmura JobsEQ and exploring on-line job and career tools that will provide services and access to resources through computer and cell phones technology. The availability of local and relevant labor market data via Chmura JobsEQ will ensure that each Title I customer has the most current information to make the best decision about a career pathway.

The USWIB will collaborate with its WIOA core program Partners to utilize the newest and most standardized employment and training tools available that will assist youth, and individuals with barriers to employment. The USWIB and WIOA core Partners will apply job-driven strategies relevant to the local economy using the American Job Center system, such as work-based learning that includes internships, apprenticeships, and possibly on-the-job training. This job -driven strategy will align employment, training, and education programs to meet performance accountability measures, and align with Benchmarks of Success goals.

The USWIB, through its One Stop Operator, and a Professional Development Committee composed of American Job Center Partners, is focused on offering certification opportunities for all local AJC staff.

Beginning in the spring of 2018, a robust professional development plan has been underway to recognize and validate employment and career service skills, for all front-line staff in the American Job Center delivery system. With staff competent and confident in the local employment and career resources, the Upper Shore will provide an effective and efficient employment and career network for job seekers and employers.

AJC staff across core Partners will be better informed about core Partner services for exceptional customer service delivery:

The USWIB will collaborate with its WIOA core program Partners to educate front-line American Job Center staff regarding the labor market in the local area by providing opportunities to meet and visit local business. Frontline staff will be offered an opportunity to visit local employers and hear firsthand about the employment availability. This relates to a focus on businesses who offer internal stepping-stone opportunities for promotion that result in retention results for our customers, and an increase in performance accountability.

The USWIB will collaborate with its WIOA core program Partners to ensure that a thorough assessment of the customer's interests and abilities for specific kinds of work is completed so that a customer understands career pathway opportunities.

Labor market information and on-going communication with local employers will ensure all American Job Center Partner staff have the information needed to guide job seekers regarding opportunities in the labor market. The USWIB supported employer listening sessions that have helped to guide the local area staff in ensuring relevant training is available for job seekers. Utilizing this information is important to create a viable job- training career pathway, and a durable and suitable match for both the local business and the job- seeking customer.

The USWIB will collaborate with its WIOA core program Partners to encourage county and town administrators to avail themselves of the Board's considerable expertise regarding data about the Upper Shore labor force. The USWIB's knowledge and experience provides useful information for economic planning, and decision making.

The USWIB operates under the idea that if the USWIB “takes a grant, it takes the performance that accompanies the grant”. The USWIB believes that the performance measure that accompany the WIOA funds lead to an efficient and effective implementation of the grant funded system. The USWIB will negotiate with the Governor as described in WIOA to set Specific, Measurable, Achievable, Realistic, Timely performance goals. Since WIOA establishes the specific, measurable, and timely aspect of grant goals, the USWIB will focus on the achievable and realistic aspect of performance goals in negotiation and practice. The USWIB will be guided by the Maryland Benchmarks of Performance when negotiating the achievable and realistic aspects of performance. The table below is a crosswalk of the Maryland Benchmarks of Performance aligned with WIOA performance that will guide Upper Shore performance negotiation.

Benchmark of Success	WIOA Performance
Increasing the earning capacity of Maryland’s workforce system customers by maximizing access to employment.	Employment Rate 2nd and 4 th Quarter after Exit Quarter
Increasing the earning capacity of Maryland’s workforce customers by maximizing access to and use of skills and credentialing.	Median Earnings 2nd Quarter after Exit Quarter Skills Gain During Participation Credentials Attainment

<p>Increase the earning capacity of Maryland's workforce system customers by maximizing access to and use of life management skills.</p>	<p>Youth Education and Employment Rate 2nd and 4th Quarter after Exit</p>
<p>Increasing the earning capacity of Maryland's workforce system customers by eliminating barriers to employment.</p>	<p>Employment Rate 2nd and 4th Quarter after Exit Quarter Median Earnings 2nd Quarter after Exit Quarter</p>

Summary: The USWIB strictly interprets WIOA's customer choice through the Eligible Training Provider List for Adults. A strong, demand driven Eligible Training Provider List will lead to skills gain and credential attainment for customers. Skills gains and credential attainment will lead to employment, employment retention, and earnings that are the basis for Benchmarks of Success.

The USWIB, by ensuring that the 14 required elements of the WIOA Youth program are made available to Youth customers, will develop essential skills for work and life that are the basis for Benchmarks of Success.

Section 3: Strategic Planning to Strengthen the Local Workforce System

Some information in this section reflects the impact of Covid-19, Governor Hogan’s Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic, social, labor market, and service delivery impact of COVID-19 in the out years of this plan is unknown.

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

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

This plan is written with the Covid-19 pandemic and Governor Hogan’s Emergency Order as a backdrop. The response to the Covid-19 pandemic by government agencies and WIOA Core Partners brought about a recognition of the expertise of each Core Partner. The USWIB believes that acknowledging and using the expertise of each Core Partner is blueprint for effective and efficient use of the resources, human and financial, for the public workforce system.

The USWIB recognizes that financial resources are limited, and no core Partner can expand its mission. An additional financial constraint is included in the WIOA regulations, 20 CFR 680.230, “What are the requirements of the Workforce Innovation and Opportunity Act training funds and other grant assistance?”. Section 20 CFR 680.230 requires coordination of funds, that is supplementing, versus replacing funds or supplanting.

In summary, aligning resources by recognizing and relying on Core Partner expertise is not only efficient and effective programmatically and financially, but also required by the supplement/supplant concept articulated in 20 CFR 680.230.

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

Throughout its 38-year history the USWIB has worked to ensure that services are delivered in each Upper Shore County. County based service delivery is necessary to ensure that the Chief Elected Officials recognize the value of federal employment and training resources to local customers. In addition, the struggle of service delivery in a rural area is real in the Upper Shore region- funding is inadequate, transportation is limited, broadband internet is expensive, and child and adult care is expensive and limited.

The COVID-19 pandemic and Governor Hogan’s Emergency Order caused a recognition among the Upper Shore WIOA Partners of the expertise that each bring to the American Job Center Partnership. Examples include the USWIB receiving a National Dislocated Worker Grant, the Maryland Department of Labor helping workers apply for and receive Pandemic Unemployment, the local Departments of Social Services distributing CARES Act funds to customers, Chesapeake College (Perkins Act) implementing pandemic safe training, and all Partners providing services virtually. The USWIB will work with all Partners through its One Stop Operator to analyze the lessons learned through pandemic service delivery and keep what is effective and efficient, and restart and re-energize services throughout the five Counties. The chart below is a summary of Workforce Partners expertise and engagement in the workforce system.

Partner	Expertise	USWIB Member	MOU/RSA	AJC
USWIB	LWDB, Local Plan, MOU/RSA, OSO, Title I Grant	Yes	Yes	No
Title I	Adult Training Services Youth 14 Elements	No	Yes	Yes
Title II	ABE, ASE, ESOL	Yes	Yes	Yes
Title III	Career Services, Employer Services, Unemployment Insurance Information, UI Reemployment Services	Yes	Yes	Yes
Title IV	Career Services, Assistance with barriers to employment	Yes	Yes	Yes
Temporary Cash Assistance	Career Services, Assistance with barriers to employment	Yes	Yes	Yes
Trade Act	Career and Training Services	Yes	Yes	Yes
Jobs for Veterans State Grant	Case management Services	Yes	Yes	Yes
Migrant and Seasonal Farm Workers	Career Services	Yes	Yes	Yes
Unemployment Insurance	Unemployment Insurance for claimants	Yes	Yes	Yes
Senior Community Service Employment Program	Career and Training Services	Yes	Yes	Yes
Community Services Block Grant	Assistance with barriers to employment	Yes	No	No
Perkins Act	Training Services	Yes	Yes	Yes

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

The USWIB will work through its One Stop Operator to operationalize the lessons of the COVID-19 pandemic and identify the expertise of each Partner.

Step 1: Identify each Partner's area of expertise:

- Barrier Removal
- Supportive Services
- Career Services
- Training Services

Step 2: Identify how services will be delivered in the post COVID-19 pandemic.

- Virtual Services
- Face to Face Services
- Hybrid: Virtual and Face to Face

Step 3: Facilitate an Information and Referral Mechanism for Partner Service Delivery

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

Partners received the USWIB sections of the draft plan as the sections were written.

Partners were asked to provide either concurrence with the current plan section or text for the draft plan.

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

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

The USWIB will work with the Upper Shore Chambers of Commerce to gain business input into American Job Center priorities for business services. Chambers of Commerce will be invited to American Job Center Partner meetings to engage in information sharing with Partners.

The USWIB will function as the Local Advisory Council for the Upper Shore Career and Technology Education programs to provide business input into curriculum and program development.

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

The USWIB, through its One Stop Operator, will encourage American Job Center Partners to create a business services strategic plan. The USWIB will provide resources to assist in the creation of a strategic plan for business services.

- To better coordinate workforce development programs and economic development.

The USWIB will work with Upper Shore economic development entities to understand business expansion and retention priorities for the five counties and municipalities that have an economic development entity. Economic development entities will be invited to American Job Center Partner meetings to engage in information sharing with Partners.

- To strengthen linkages between the AJC delivery system and Unemployment Insurance programs.

The USWIB will depend on the Maryland Department of Labor Division of Workforce Development and Adult Learning staff to provide the bridge between the Maryland Department of Labor Division of Unemployment Insurance and the Upper Shore American Job Center Partners. MD Labor will be asked to provide an Unemployment Insurance update at American Job Center Partner meetings.

- (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 USWIB will create and implement an online survey that will be the vehicle for job seeker input into the service delivery of the American Job Center. The survey universe will be drawn from email addresses available through the Maryland Workforce Exchange. The survey will be done yearly. Survey results will be shared with American Job Center Partners and the USWIB.

- (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,

The USWIB accesses EARN training funding for Healthcare for customers recruited through the American Job Centers. EARN training funds supplement WIOA training funds.

- Pre-apprenticeship and Registered Apprenticeship,

The USWIB, through the One Stop Operator, the American Job Center Partners, and Title I service delivery, provides information and referral to Apprenticeship opportunities listed on the Eligible Training Provider List. Apprenticeship opportunities supplement WIOA training funds.

- Incumbent worker training programs,

Funding levels make incumbent worker training programs improbable with the Title I WIOA formula funding.

- On-the-job training programs,

Funding levels make On the Job Training programs improbable with the Title I WIOA formula funding.

- Customized training programs,

Funding levels make Customized training programs improbable with the WIOA formula funding.

- Industry and sector strategies,

Funding levels make Industry and sector strategies improbable with the WIOA formula funding. The USWIB will influence sector formation through the Program Advisory Groups and the Local Advisory Council.

- Integrated education and training,

The Upper Shore Title II operator will evaluate integrated education and training strategies and determine if the strategy is an effective and efficient use of funding.

- Career pathways initiatives,

The Upper Shore Title I operator will explore the implementation of Career Pathway Individual Training Accounts that will allow customers to pursue training as a pathway.

- Utilization of effective business intermediaries,

The USWIB is a member of five Chambers of Commerce. The Chambers are the dominant business intermediary organizations in the Upper Shore area. The USWIB contracts with the Chambers of Commerce if there is mutual benefit rather than hire or divert staff to a business-based project.

- Other business services and strategies.

The USWIB will use its network to identify business services strategies that lead to jobs, earnings, skills gains, and credentials.

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

The USWIB, the Upper Shore and Mid Shore Regional Councils, the Maryland Department of Commerce Regional Representatives, the five County Economic Development Directors, and the Municipal Economic Development Directors rely on the resources listed below to assure that entrepreneurs are aware of resources that are available in the Upper Shore area.

- Small Business Development Center: Consulting and training in accessing capital, business planning, international trade, marketing, technology development, regulatory compliance. The WIOA Title I operator office is co-located with the Small Business Development Center at Chesapeake College, Wye Mills.
- Service Core of Retired Executives: Business mentoring and education. The Service Core of Retired Executives is invited to the American Job Center Partner meetings.
- Eastern Shore Entrepreneurship Center: hotDESKS co-working space, F3 Tech business accelerator, Revolving Loan Fund, and Technical Assistance for entrepreneurs. The Eastern Shore Entrepreneurship Center is housed in the Mid Shore Regional Council. The Mid Shore regional Council Executive Director is a USWIB member.
- Eastern Shore Innovation Center: business incubator. The Dorchester County Economic Development Director is invited to the Dorchester County American Job Center Partner meeting.

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

The USWIB will ensure that the One Stop Operator invites the Local Management Board Directors to American Job Center Partner meetings. The American Job Center Partner meetings will allow for an exchange of information about supportive services and an exchange of ideas about shared mission and customers groups of the Local Management Board and the core Partners.

The USWIB, though, its One Stop Operator will facilitate an ongoing discussion of supportive services available through American Job Center Partners and facilitate an information and referral mechanism for customers.

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

The USWIB functions as the Local Advisory Council for the Career and Technology Education programs at the secondary and post-secondary levels in the area. The Local Advisory Council function allows the USWIB and Career and Technology Education operators to determine how to give business a voice in existing training activities.

The USWIB is member of and resource for the Program Advisory Groups at Chesapeake College. The Program Advisory Groups are business-based groups, established for all Perkins funded trainings, to provide business input on training curriculums and delivery.

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

The USWIB acts as a convener for workforce training opportunities. When the USWIB receives notification of a workforce training opportunity, it convenes interested Partners to evaluate the possibility of an application and determines who will lead the effort and the role that USWIB will play in the effort.

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

(M) Community and Faith Based Organizations play a vital role as an information and referral partner for the American Job Centers

Section 4: American Job Center Delivery System

Some information in this section reflects the impact of Covid-19, Governor Hogan’s Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic, social, labor market, and service delivery impact of COVID-19 in the out years of this plan is unknown.

As this plan is written, all Partners are delivering services virtually.

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

American Job Center Easton
301 Bay Street Suite 301
Easton, MD 21601
410-822-3030
Comprehensive
Maryland Department of Labor

American Job Center Denton
300 Market Street Suite 301
Denton, MD 21629
410-819-4549
Satellite
Caroline County Department of Social Services

American Job Center Cambridge
416-418 Race Street
Cambridge, MD 21613
410-901-4250
Satellite
Upper Shore Scholarship Office

American Job Center Chestertown
115 South Lynchburg Street
Chestertown, MD 21620
410-778-3525
Satellite
Upper Shore Scholarship Office

American Job Center Centreville
125 Comet Drive
Centreville, MD 21617
410-820-9966
Satellite
Queen Anne’s County
Department of Social Services

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

As this plan is written, all Partners are delivering services virtually due to Covid-19. The descriptions of service delivery in this section assume that services are delivered face to face.

1. Customer enters an American Job Center:
 - Is greeted.
 - Signs in
 - Veteran status is determined.
2. Customer logs into the Maryland Workforce Exchange
3. Customer uses the Maryland Workforce Exchange without staff assistance.
4. Customer looks for a job through the Maryland Workforce Exchange with assistance of Maryland Labor Staff
 - Staff assigns an activity code.
 - Customer becomes a Wagner Peyser Participant
 - Customer will impact Wagner Peyser performance
5. Customer is triaged for American Job Center Partner Services
 - Customer may be referred to Partner.
6. Partner provides information on program and eligibility.
7. Partner begins intake and eligibility process.
 - Eligibility is determined.
 - Intake takes place.
 - Customer is assessed using Partner assessment tool.
 - Title I (if required), Title II, Trade Act will use Maryland Department of Labor Policy Issuance 2020-05 Basic Education Skills and English Language Assessments September 22, 2020 to assess customers.
8. Eligible Customer will engage in Partner services.
 - Staff assigns an activity code.
 - Customer becomes a Participant.
 - Participant will impact Partner performance.
 - Partner will track Customer on Management Information System
 - Partner will establish a case file as required.
9. Customer exits Partner services.
10. Customer is in Partner follow up services.

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

The USWIB will establish a One Stop Operator procurement ad hoc committee consisting of Board Members. The ad hoc committee will release a Request for Proposals (RFP). The RFP process will be based on the Chesapeake College procurement process and rules. The ad hoc committee will evaluate RFP responses and make a recommendation to the USWIB. The USWIB will concur with the ad hoc committee recommendation or require the ad hoc committee to re-bid the One Stop Operator function.

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

Chesapeake College is the only non-Apprenticeship training provider in the Upper Shore region. Many of Chesapeake College's Perkins funded training options are on the Eligible Training Provider List. The USWIB is a member of the Program Advisory Groups for the Perkins funded training programs at Chesapeake College. The Program Advisory Groups provide an opportunity for business input in the curriculum and delivery of training programs. The USWIB acts as the Local Advisory Council for Career and Technology Education in the Upper Shore area. The Local Advisory Council provides an opportunity for the needs of businesses, workers, and jobseekers to provide input that will lead to continuous improvement.

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

The COVID-19 pandemic and Governor Hogan's Emergency Order required the USWIB and its American Job Center Partners to rethink service delivery and move 100% of services to online, virtual and/or telephone. Some aspects of virtual services are not ideal, for instance, it is challenging to establish a case manager/Customer relationship. Some of the more mundane tasks of intake and eligibility such as data collection and document collection have been easy to accomplish virtually. The USWIB will require the Upper Shore Scholarship Office to review the challenges and opportunities of the COVID-19 service delivery response and retain what worked well and restart and re-energize those services which lend themselves to face to face service delivery.

- (F) A description of the roles and resource contributions of the AJC partners

The USWIB will facilitate the creation and submission of an American Job Center Memorandum of Understanding and Resource Sharing Agreement within the scope and purpose detailed in Maryland Policy Issuance, PI 2016-09, Memorandum of Understanding and Resource Sharing Agreements, September 27, 2016. The USWIB will create a Memorandum of Understanding that is County specific and "rolls up" into a regional document.

- (G) A description of *how* the Local Board will use Individualized Training Accounts based on high-demand, difficult to fill positions identified within local priority industries identified in Section 1(A). The USWIB interprets sections 20 CFR 680.210 and 20 CFR 680.340 of the Workforce Innovation and Opportunity Act regulations.

Section 20 CFR 680.210 b requires the Customer to "select a program of training services directly linked to the employment opportunities in the local area or the planning region, or in another area to which the individuals are willing to commute or relocate". The Upper Shore Scholarship Office implements this section of the regulations by requiring Customers to use Labor Market Information supplied by the USWIB and Labor Market research performed by the Customer to establish that

employment opportunities exist within the Customer's personal Labor Market. Once the Customer determines a training and a training vendor from the Eligible Training Provider List, 20 CFR 680.340 of the WIOA regulations requires that if a Customer is eligible, the training is selected from the Eligible Training Provider List and the program has not exhausted training funds, then the Customer must be referred to the training provider and an Individual Training Account must be established. The USWIB views the Customer choice requirements of 20 CFR 680.210 and 20 CFR 680.340 as a mechanism to empower Customers to "own" the training choice. On the other hand, 20 CFR 680.210 and 20 CFR 680.340 are a slippery slope for the USWIB relative to Equal Opportunity if a Customer is denied training when the Customer has followed the process detailed in the regulations.

The Census Bureau Longitudinal Employer-Household Dynamics commuting patterns for the Upper Shore indicate that the region is a net outflow area and 5.8% of Upper Shore commuters work in Delaware. The USWIB encourages Delaware Eligible Training Provider List training vendors to list trainings on the Maryland ETPL. If, however, a Customer is within the parameters listed in 20 CFR 680.210 b, the Customer may choose to attend a training on another state's ETPL if the customer validates that they are willing to commute to or relocate to the state. This choice is not desirable to the USWIB; however, it is required by 20 CFR 680.210.

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

The USWIB will guarantee that the Adult training funding allocation will be delivered using the priority of service hierarchy listed below. The USWIB will manage the priority of service by evaluating the number of participants who are issued an Individual Training Account and are a member of group 1-4 listed below. 51% or more of the Upper Shore Adult Customers who receive an ITA will fit the criteria for group 1-4 from the list below.

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

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

Federal citations: 38 U.S. Code § 4215 - Priority of service for veterans in Department of Labor job training programs - <https://www.gpo.gov/fdsys/pkg/USCODE-2008-title38/pdf/USCODE-2008->

[title38-partIII-chap42-sec4215.pdf](#); A Protocol for Implementing Priority of Service For Veterans and Eligible Spouses: <https://wdr.doleta.gov/directives/attach/TEN/ten2010/ten15-10a1.pdf>.

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

The USWIB does not envision implementing Incumbent Worker training opportunities in its current WIOA funding scenario. If the Adult and Dislocated Worker formula funding allocations reach a combined total of \$1,000,000, the USWIB will evaluate incumbent worker training opportunities through its budget process and will create policies that will lead to incumbent worker training opportunities in the region.

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

The USWIB requires its One Stop Operator to establish and convene a Professional Development Committee composed of American Job Center Partners. The USWIB allocates funding for Professional Development in its budget. The One Stop Operator, through the Professional Development Committee, creates professional development opportunities for American Job Center Staff. Whenever possible, the USWIB contracts with Chesapeake College to provide Continuing Education Units for Professional Development activities. CEUs provide a measure of the engagement of American Job Center staff and a measure of USWIB's commitment to equipping staff with WIOA compliant customer service.

Title I specific training is available to Title I staff through the provisions of the Chesapeake College professional development benefits and through specific training made available to Title I funded staff.

Section 5: Title I Adult, Youth, and Dislocated Worker Functions

Some information in this section reflects the impact of Covid-19, Governor Hogan's Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic, social, labor market, and service delivery impact of COVID-19 in the out years of this plan is unknown.

Local Policies

Local policies are available for review in person at the Upper Scholarship Office, Economic Development Center, Chesapeake College, Wye Mills, MD 21679. Policies may be requested by contacting the USWIB Executive Director at 410-822-1716 and will be emailed to the requestor.

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

The USWIB is focused on providing Career Planning, Individual Training Accounts, and Supportive Services that facilitate the participation in training, case management, and follow up services for eligible adults and dislocated workers. The number of adults and dislocated workers receiving services is limited by the Title I formula funding allocation for the Upper Shore region.

The USWIB service delivery is based on the customer choice criteria of the Workforce Innovation and Opportunity Act and its regulations. Customer choice is viewed two ways to the USWIB. First, customer choice is a compliance issue as it is specified in the law and regulations. Second, customer choice gives the Participant ownership of their career pathway decision and increases the likelihood of success.

Career Planning: The Upper Shore Scholarship Office provides a customer-based approach in the delivery of services designed to prepare and coordinate individual employment plans. Career Planning includes services by Upper shore Scholarship Office staff and the Customer to research and plan a training service strategy that leads to a career pathway.

Individual Training Accounts: The Upper Shore Scholarship Office implements a strict interpretation of 20 CFR 680,210 b and 20 CFR 680.340 to provide eligible individuals with an Individual Training Account in support of the individual employment plan. Individual Training Accounts are established in accordance with the Upper Shore Priority of Service criteria for the WIOA Adult funding allocation.

Supportive Services: The Upper Shore Scholarship Office provides eligible individuals with a \$15/day stipend to offset the transportation costs associated with travelling to training. The stipend is provided on days when training takes place and is validated by an attendance sheet signed by the trainer. Stipends are paid monthly. Eligible individuals are those Customers not receiving Unemployment Insurance.

Case Management: The Upper Shore Scholarship Office provides job, education, and career counseling during program participation.

Follow Up Services: The Upper Shore Scholarship Office provides job, education, and career counseling for one year after program participation.

Assessment of activities: The USWIB uses the WIOA performance metrics to evaluate the effectiveness of adult and dislocated worker services. The WIOA Title I funded staff provides performance data to the USWIB via email when the performance chart is received from the Maryland Department of Labor. The performance chart is made available to the public via www.uswib.org.

- (B) A description of how the Local Board will coordinate workforce development activities carried out in the Local Area with statewide rapid response activities, as described in Section 134(a)(2)(A).

The USWIB and the Upper Shore Scholarship Office will implement its role in rapid response in accordance with Maryland Policy Issuance 2018-05 Rapid Response August 16, 2018.

The USWIB will ensure that the Executive Director or designee will participate on the Core Rapid Response Team, will act as the team lead if selected by the Core Rapid Response Team, and implement the Title I Dislocated Worker activities agreed to in the Rapid Response Action Plan. The USWIB views Rapid Response as a crucial referral source for eligible dislocated workers.

- (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.

The COVID-19 pandemic, Governor Hogan's Emergency Order, and minimal WIOA Youth formula funding forced the USWIB to find a new way to deliver In School Youth services. In School Youth services are being provided virtually using a platform specifically created to align with the 14 required youth program elements. The online tool allows staff to monitor progress and is competency based so that youth accomplishments are documented. The staff provides technical assistance to youth to enable participation and follow up to make sure that youth are "logging on" and using the tool. In addition, staff works with youth to make sure that schoolwork is being completed in the delivery mechanism being employed in the County where the youth reside. The USWIB may move to a hybrid delivery model when Governor Hogan rescinds the Emergency Order, but the USWIB envisions a virtual component playing a significant role in the future for the Upper Shore In School Youth program. The USWIB is in the third year of a contract with the Maryland Division of Rehabilitation Services to provide a summer work-based learning experience for Pre-Employment Transition Students. The Upper Shore Scholarship Office recruits In School Youth from referrals provided by the Maryland Division of Rehabilitation Services.

Referrals for the Upper Shore Out of School Youth program flow from the Upper Shore American Job Centers. Additional referrals come from Chesapeake College. Out of School Youth are served through Individual Training Accounts for training selected from the Eligible Training Provider List.

All youth will be a party to and participate in the creation of an Individual Service Strategy. The Individual Service Strategy will describe the 14 elements that will be the focus of the Youth's service strategy.

Supportive Services:

Youth will receive \$25/activity for participation in and successful completion of the 14 elements online platform.

Youth participating in an Individual Training Account activity will receive a \$15/day stipend on days when training takes place to offset the cost of travelling to training. An attendance sheet signed by the trainer will document attendance. Stipends will be paid monthly. Youth receiving Unemployment Insurance will not be eligible for a stipend.

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

The USWIB is a member of the Program Advisory Groups for Perkins funded training options at Chesapeake College. The Program Advisory Groups provide businesses, educators, and job seekers with a voice in curriculums and training delivery. Program Advisory Groups bring together stakeholders to discuss best practices, effective program delivery, and efficient program delivery. The USWIB acts as the Local Advisory Council for Career and Technology Education at the secondary and post-secondary level in the Upper Shore. The Local Advisory Council provides businesses, educators, and job seekers with a voice in curriculum and training delivery. The Local Advisory Council brings together stakeholders to discuss best practices, effective program delivery, and efficient program delivery.

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

The Upper Shore Scholarship Office provides eligible participants with a \$15/day stipend to offset the cost of transportation to training. The stipend is paid for days when training takes place and is verified by an attendance sheet signed by the trainer. Stipends are paid monthly. Participants receiving Unemployment Insurance are not eligible for the stipend.

The USWIB participates in the Upper Shore Transportation Advisory Group. The Transportation Advisory Group brings together public transit providers, American Job Center Partners, Maryland Upper Shore Transit, County Government, and other stakeholders to discuss the current transit schedule and make the group aware of trends in and changes to transit in the region.

The quarterly American Job Center Partner meetings brings together the Core Partners and other stakeholders to exchange information and learn about referral mechanisms for supportive services inside and outside the Workforce Innovation and Opportunity Act.

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

The USWIB will guarantee that the WIOA Title I Adult training funding allocation will be delivered using the priority of service hierarchy listed below. The USWIB will manage the WIOA Title I Adult priority of service by evaluating the number of participants who are issued an Individual Training Account and are a member of group 1-4 listed below. 51% or more of the Upper Shore Adult Customers who receive an ITA will fit the criteria for group 1-4 from the list below.

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

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

WIOA Title I Adult funds may be used for Personnel, Fringe Benefits, Travel, Participant Training, Supportive Services, Supplies, Contractual Services, and Indirect Costs. The USWIB will only expend funds on Equipment with the required pre-procurement permission.

Cost Categories for Adult Funds

- Personnel: Full time and contractual staff
- Fringe Benefits: Costs such as health insurance, FICA, retirement, etc.
- Travel: Staff travel to implement the program in the service region. Staff and Board travel to professional development opportunities and required meetings.
- Participant Training: Services as described in the Workforce Innovation and Opportunity Act
- Supportive Services: Services as described in the Workforce Innovation and Opportunity Act, Upper Shore Local Plan, and Upper Shore policy
- Equipment: Equipment with a per unit cost exceeding \$5,000 and a useful life of more than one year
- Supplies: Consumable office supplies and other supplies
- Contractual: One Stop Operator, rent, communication, internet, project consultants, fiscal agent, auditor, insurance, other contracts

The levels of expenditures in each Cost Category will be determined by the grant agreement with the Maryland Department of Labor and the USWIB budget.

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

Dislocated Worker funds may be used for Personnel, Fringe Benefits, Travel, Participant Training, Supportive Services, Supplies, Contractual Services, and Indirect Costs. The USWIB will only expend funds on Equipment with the required pre-procurement permission.

Cost Categories for Dislocated Worker Funds

- Personnel: Full time and contractual staff
- Fringe Benefits: Costs such as health insurance, FICA, retirement, etc.

- Travel: Staff travel to implement the program in the service region. Staff and Board travel to professional development opportunities and required meetings.
- Participant Training: Services as described in the Workforce Innovation and Opportunity Act
- Supportive Services: Services as described in the Workforce Innovation and Opportunity Act, Upper Shore Local Plan, and Upper Shore policy
- Equipment: Equipment with a per unit cost exceeding \$5,000 and a useful life of more than one year
- Supplies: Consumable office and other supplies
- Contractual: One Stop Operator, rent, communication, internet, project consultants, fiscal agent, auditor, insurance, other contracts

The levels of expenditures in each Cost Category will be determined by the grant agreement with the Maryland Department of Labor and the USWIB budget.

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

Self Sufficiency will be defined using the Living Wage Calculator from the Massachusetts Institute of Technology (MIT) available at: <https://livingwage.mit.edu/>. The MIT Living Wage Calculator provides an hourly wage that represents a living wage estimation by Maryland County. The MIT hourly living wage will be compared to the Customer’s hourly wage. An employed Adult earning less than or equal to the MIT living wage calculation for a resident of the Customer’ county will be defined as below self-sufficiency. The Upper Shore Scholarship Office will engage in career planning in the context of movement along career pathways for individuals who are employed.

- (I) A description of the Local Board’s definition of “unlikely to return to previous industry or occupation” when required for eligibility for Dislocated Worker services.

The USWIB defines unlikely to return to previous industry or occupation based on the criteria:

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

- insufficient education for reentry into the former occupation or industry.

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

The USWIB will use the Adverse Childhood Experience Test that grew out of a study of adverse childhood experiences and the impact of those experiences on adult life. The study was conducted by the Center for Disease Control and Kaiser Permanente of San Diego CA. Information about Adverse Childhood Experiences and measurement and impact of Adverse Childhood Experiences can be found at: <https://www.cdc.gov/violenceprevention/aces/index.html>.

The Upper Shore Scholarship Office will evaluate Youth applicants using the parameters of the Adverse Childhood Experience Test and if an applicant has 1 or more adverse childhood experiences, the Youth will be considered to require additional assistance to:

- Complete an educational program, or
- Secure employment, or
- Hold employment.

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

The USWIB will use the Adverse Childhood Experience Test that grew out of a study of adverse childhood experiences and the impact of those experiences on adult life. The study was conducted by the Center for Disease Control and Kaiser Permanente of San Diego CA. Information about Adverse Childhood Experiences and measurement and impact of Adverse Childhood Experiences can be found at: <https://www.cdc.gov/violenceprevention/aces/index.html>.

The Upper Shore Scholarship Office will evaluate Youth applicants using the parameters of the Adverse Childhood Experience Test and if an applicant has 1 or more adverse childhood experiences, the Youth will be considered to require additional assistance to:

- Complete an educational program, or
- Secure employment, or
- Hold employment.

(L) A description of the documentation required to demonstrate a “need for training.”

The need for training is documented by one of the following:

- The applicant is eligible for services through the WIOA Title I Adult, Youth, or Dislocated Worker program, or
- The eligible applicant has selected a training from the Eligible Training Provider List, or
- WIOA Title I funding is supplementing not supplanting other training funds.

(M) A description of how the Local Board will provide access to the 14 required program elements for the WIOA Youth program design, including whether the Local Board has contracted with youth service providers or not:

The COVID-19 pandemic and Governor Hogan’s Emergency Order required the USWIB to provide Youth services via an online platform that aligns with the 14 WIOA Youth elements. When Governor Hogan rescinds the Emergency Order, the USWIB and Upper Shore Scholarship Office staff will evaluate the online platform and a hybrid model of youth services.

The services listed below, and the procurement method listed below will define the Upper Shore Youth program for the duration of this plan.

1. Tutoring: Contractual staff or contracted service
Skills training: Contracted service
Dropout prevention: Contractual staff or contracted service
2. Alternative secondary school services: Contractual service
3. Paid and unpaid work experiences: Contractual Service
4. Occupational skills training: Individual Training Account
5. Leadership development opportunities: Contracted service
6. Supportive services: Contractual service
7. Mentoring: Contractual and Upper Shore Scholarship Office staff
8. Follow-up services: Contractual and Upper Shore Scholarship Office staff
9. Counseling: Contractual and Upper Shore Scholarship Office staff
10. Concurrent education and workforce preparation activities: Contractual service
11. Financial literacy education: Contractual Service
12. Entrepreneurial skills training: Contractual Service
13. Labor Market Information: Contractual Service
14. Preparing for Post-Secondary Education and Training: Contractual staff and Upper Shore Scholarship Office staff

The Youth participant and Upper Shore Scholarship Office staff will jointly create an Individual Service Strategy that will identify the 14 elements that will be the basis of the service strategy.

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

The USWIB will budget 20% of its Youth program allocation into a Work Based Learning line item. This budget strategy will allow the Upper Shore Scholarship Office staff to have a real time snapshot of progress toward the 20% work-based learning expenditure goal.

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

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

The USWIB has implemented a contract with the Maryland Division of Rehabilitation Services to provide a summer work-based learning experience for Pre-Employment Transition (PreET) Youth. The Youth are referred to the Upper Shore Scholarship Office for services. The PreET Youth are screened for and offered the opportunity to continue after the summer as Upper Shore Title I WIOA eligible In School Youth. The Youth who are enrolled in the WIOA In School Youth program work with staff to create an Individual Service Strategy which provides access to and participation in the 14 elements required to be available for youth by WIOA. The USWIB will monitor its youth expenditures and the percentage split between In School and Out of School Youth. If it is advantageous for the USWIB to move to a 50%/50% split in youth expenditures between In School and Out of School Youth, the expenditure split will be modified. If the USWIB can maintain the 75% Out of School and 25% In School expenditure split, it will do so. The driving force in the decision will be the number of referrals from the Division of Rehabilitation Services and the number of those referrals who wish to continue in the WIOA Title I In School Youth program.

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

The USWIB will look to all Partners, whether Core WIOA American Job Center Partners or other federally funded Partners to supplement rather than supplant Career Planning Services, Supportive Services, and Training Services. There is a common theme among all Partners and that is the lack of financial resources to implement all required activities and services required by the federal funding streams. The USWIB will work through its One Stop Operator to insure that Title I, Title II, Title III, Title IV, and TANF funds are not supplanting other funds. The USWIB will work through its One Stop Operator to ensure that WIOA titles are not being relied upon to supplant non WIOA federal workforce funds in the Upper Shore region.

The Upper Shore Scholarship Office staff will provide Career Planning services to eligible participants whose goal is to enroll in a WIOA Title I program. The Upper Shore Scholarship Office staff will provide Supportive Services, Training Services, and Follow Up services to WIOA Title I participants.

American Job Center Partners will provide information to Partners at quarterly meetings convened by the One Stop Operator about the Career, Training and Follow Up services available within the mission of their services.

The One Stop Operator will work with all Partners to facilitate the information and referral process between Partners with the goal to provide an effective and efficient experience for Customers.

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

Upper Shore Scholarship Office staff will contact customers quarterly for one year following exit. The contact may be accomplished by email, electronic message, phone, in person, or through contact initiated by an American Job Center partner. The Customer contact will be documented via a case note in the Maryland Workforce Exchange. If there is an indication additional services may be beneficial, the customer will be referred to an Upper Shore Scholarship Office staff member for an assessment for additional services. If a customer is unreachable for three quarters in a row, the customer will be placed in an inactive follow up status and a final follow up attempt will be made at the twelve-month date.

Section 6: Title II- Adult Education and Family Literacy Functions

Some information in this section reflects the impact of Covid-19, Governor Hogan's Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic impact of COVID-19 in the out years of this plan is unknown.

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

The USWIB is responsible for developing Career Pathways by "aligning employment, training, education and supportive services that are needed by adults and youth particularly individuals with barriers to employment". The USWIB will include Adult Education and Family Literacy (AEFL) funded staff in employer meetings convened in support of determining needs related to Career Services, Training Services, and Educational Services. Employer engagement is the basis for understanding and developing Career Pathways "maps" for Upper Shore WIOA customers. WIOA allows Title II funds to be expended for Integrated Education and Training, Workforce Preparation Activities and Integrated English Literacy and Civics Education. The USWIB will ensure that Title II service provider takes full advantage of the opportunities and flexibility provided by WIOA through the responsibilities of the Local Workforce Development Board to negotiate the One Stop Memoranda of Understanding and Resource Sharing Agreement and to review the local AEFL plan before submission.

The USWIB will include the following topics in its review of the Upper Shore AEFL plan(s) to complete the DLLR WIOA Alignment Form:

- Title II funds budgeted for Integrated Education and Training Activities.
- Title II funds budgeted for Workforce Preparation Activities.
- Title II funds budgeted for Integrated English Literacy and Civics Education.
- Title II funds budgeted for One Stop Infrastructure.
- Title II funds budgeted for the operation of AEFL activities in the One Stop system.
- Integration of AEFL activities and One Stop Partner activities including AEFL Transition Services.

- Data sharing including the collection of intake information; and
- Selective Service registration verification mechanism for AEFL customers.

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

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

The USWIB will include the following topics in the discussion, negotiation and execution of the One Stop Memoranda of Understanding and Resource Sharing Agreement with Title II:

- Aligning basic education skills and English language assessment protocols, tests, methodologies among all Upper Shore One Stop employment and training Partners.
- Aligning the administration of basic education skills and English language assessments among all Upper Shore One Stop Partners
- Assurance that assessments are conducted in accordance with applicable guidelines set forth by assessment publisher.
- Data sharing agreements that will include assessment results and customer information contributing to common intake processes.
- The Title II contribution to One Stop Infrastructure
- Operational deployment of AEFL services in the One Stop system
- Title II: Basic skills assessment for all AJC partners
- The USWIB will include the following topics in the discussion, negotiation and execution of the One Stop Memoranda of Understanding and Resource Sharing Agreement with Title II.
- Aligning basic education skills and English language assessment protocols, tests, methodologies among all Upper Shore One Stop employment and training Partners.
- Aligning the administration of basic education skills and English language assessments among all Upper Shore One Stop Partners.
- Assurance that assessments are conducted in accordance with applicable guidelines set forth by assessment publisher.

- Data sharing agreements that will include assessment results and customer information contributing to common intake processes.
- The Title II contribution to One Stop Infrastructure
- Operational deployment of AEFL services in the One Stop system including Information and Referral, Orientation to AEFL, Assessment, Workforce Preparation Activities, Transitions Service Activities, Data Sharing

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

The County/USWIB Agreement specifies that the President of Chesapeake College serves as a member of the USWIB. The President of Chesapeake College is the only Title II grant recipient in the Upper Shore area. If more than one Title II grant is awarded in the Upper Shore area, the USWIB President will convene the grant recipients and designate a Title II representative for the USWIB. The USWIB will revise the County/USWIB Agreement if multiple Title II grants are awarded or if Chesapeake College is no longer the Upper Shore sole Title II grantee.

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

The USWIB will engage in good faith negotiations with the Upper Shore AEFL provider(s) to negotiate the AEFL role in the Upper Shore One Stop system. The negotiations will take place through the One Stop Memoranda of Understanding and Resource Sharing Agreement. The negotiation will include Information and Referral, Orientation to AEFL, Assessment, Workforce Preparation Activities, Transitions Service Activities and Data Sharing. If classroom space is available in the One Stop location, the use of that space by AEFL will be a topic of negotiation.

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

Chesapeake College, as the recipient of Upper Shore Title II IELCE funding under WIOA Section 243, shall implement integrated English literacy and civics education activities to help English language learners achieve competence in English through contextualized instruction on the rights and responsibilities of citizenship, naturalization procedures, civic participation, and United States history

and government to help such learners acquire the skills and knowledge to become active and informed parents, workers and community members. These education activities are aligned with Maryland's ESL content standards and taught concurrently. The IELCE services shall include:

1. English Language Acquisition (speaking and comprehension) and
2. Literacy (reading and writing) and
3. Civics education (the rights and responsibilities of citizenship and civic participation)

In addition, students in the IELCE Program shall be given access to integrated education and training (IET), but attendance in this training is not mandatory for the IELCE student.

Section 7: Title III- Wagner-Peyser Functions

Some information in this section reflects the impact of Covid-19, Governor Hogan's Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic impact of COVID-19 in the out years of this plan is unknown.

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

29 United States Code 49 f describes how Wagner-Peyser funds may be used. The Upper Shore Scholarship Office will coordinate the Career Services delivered by Wagner-Peyser funded staff with the Career Services delivered by other core Partners through the Memoranda of Understanding and Resource Sharing Agreement. Wagner-Peyser Career Services, delivered on behalf of the Secretary of Labor, provide services without eligibility for job seekers and employers in the Upper Shore area. The USWIB recognizes the expertise of Wagner-Peyser staff in the delivery of Career Services for job seekers and services for employers. The USWIB vision for Wagner-Peyser coordination may be summarized as "jobs for people, people for jobs".

The USWIB will ensure that the Wagner-Peyser functions listed below will be discussed negotiated, and included in the Upper Shore One Stop Memoranda of Understanding:

- Job search and placement services to job seekers, including unemployment insurance claimants, employment counseling, testing, occupational and labor market information, assessment, and referral to employers.
- Appropriate recruitment and technical assistance services for employers
- Linkages between EARN, Apprentice and Training, programs and projects funded through the Governor's WIOA set aside and other state initiatives not included under WIOA legislation, including the provision of labor exchange services at education sites.
- Provision of services for workers who have received notice of permanent layoff or impending layoff, or workers in occupations which are experiencing limited demand due to technological change, impact of imports, or plant closures.
- Developing and disseminating labor market and occupational qualification information.
- Administering the work test for the State unemployment compensation system, including making eligibility assessments, and providing job finding and placement services for unemployment insurance claimants.

- Providing unemployment insurance claimants with referrals to, and application assistance for training and education resources and programs, including Federal Pell Grants under subpart 1 of part A of title IV of the Higher Education Act of 1965 (20 U.S.C. 1070a et seq.), educational assistance under chapter 30 of title 38 (commonly referred to as the Montgomery GI Bill), and chapter 33 of that title (Post-9/11 Veterans Educational Assistance), student assistance under title IV of the Higher Education Act of 1965 (20 U.S.C. 1070 et seq.) [and 42 U.S.C. 2751 et seq.], State student higher education assistance, and training and education programs provided under titles I and II of the Workforce Innovation and Opportunity Act [29 U.S.C. 3111 et seq., 3271 et seq.], and title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.).
- Providing Unemployment Insurance Claimants with meaningful assistance in the American Job Centers.

B. A description of how the Local Board will ensure that migrant and seasonal farm workers in its Local Area will be provided employment services.

The USWIB will require the Wagner-Peyser representative to the One Stop Memoranda of Understanding and Resource Sharing Agreement negotiations include the provision of Career Services to Migrant and Seasonal Farmworkers (MSFW) in the discussion, negotiation and execution of the One Stop Memoranda of Understanding and Resource Sharing Agreement. The USWIB will require the Wagner-Peyser representative to the One Stop Memoranda of Understanding and Resource Sharing Agreement to include an Information and Referral mechanism to connect MSFW to the National Farmworkers Jobs Program.

The USWIB has reviewed Maryland Policy Issuance 2018-14 to determine the roles and responsibilities for the delivery of services to Migrant and Seasonal Farmworkers and to ensure that the State of Maryland is complying with the Richey Order.

Responsibility for the delivery of services for MSFWs and compliance with the Richey Order rest with the State Monitor Advocate, the Director of the Office of Workforce Development, and the Director of Policy for the Division of Workforce Development and Adult Learning, and the Labor Exchange Administrator for the Upper Shore area. The USWIB will rely upon the incumbents in these positions to ensure that MSFW services are provided and to verify in writing to the USWIB President each year that services have been provided.

OUTREACH WORKERS

Outreach Workers are the primary access point to Maryland's workforce system for a Migrant and Seasonal Farmworker (MFSW). Outreach Workers must engage in outreach activities to locate and contact MSFWs who are not being reached by the normal intake activities conducted in and through AJCs.

Outreach Workers must:

- Complete training on local AJC procedures and MSFW services, benefits, and protections, including protections for farmworkers against sexual harassment.
- Explain to MSFWs at their working, living, or gathering areas including day haul sites, by means of written and oral presentations either spontaneous or recorded, in a language readily understood by them, the following:
 - The services available at local AJCs and other related services.
 - Information on the Employment Service and Employment-related Law Complaint System.
 - Information on the other organizations serving MSFWs in the area; and,
 - A basic summary of farmworker rights.
- 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. DLLR 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, DLLR 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.
- Encourage MSFWs to go to the most accessible local AJC to obtain the full range of employment and training services. (If an MSFW cannot or does not wish to visit the local AJC, the Outreach Worker must offer to provide assistance at the MSFWs worksite or living quarters.).
- Provide MSFWs with job referrals to employment opportunities.
- What is a "Job Referral?"
- The term "job referral" has a very specific definition under 20 CFR §651.10. To make a job referral, Outreach Workers must make direct contact with the hiring employer, either by phone, email, or in person, to bring candidate MSFWs who are able, willing, and available to

fill openings to the attention of the employer. Records of employer contacts for job referrals should be retained for documentation in case notes.

- Assist in preparing complaints and referring them, as appropriate.
- Refer MSFWs to supportive services and/or career services, as needed.
- Assist in accessing resources for MSFW(s) to and from local AJCs or other appropriate agencies.
- Make follow-up contacts as necessary and appropriate to provide MSFW services.
- Work with employers to schedule and conduct field visits to the working and living areas of MSFWs, to discuss employment services and other employment-related programs with MSFWs, crew leaders, and employers.
- Conduct random, unannounced field checks to agricultural worksites where MSFW's have been placed through the intrastate or interstate recruitment system, to ensure that conditions are as stated on the job order and that the employer is not violating an employment-related law.
- Observe the working and living conditions of MSFWs and, on seeing or learning of a suspected violation of federal or state employment-related law, document and refer information to the LEA for processing.¹⁸ Additionally, if an Outreach Worker observes or receives information about apparent violations,¹⁹ the Outreach Worker must document and refer the information to the LEA for their Local Area.
- Be trained in the procedure developed by DLLR for informal resolution of complaints.
- Maintain complete records of contacts with MSFWs and the services delivered, using the following documentation and procedures -
- Complete a daily log²⁰ to record information collected during outreach visits to MSFW sites.
- Send completed Daily Logs to the LEA/supervisor on a monthly basis; and,
- Document information on apparent violations and complaints, including a description of the actions taken to gather information, and refer to other entities, as appropriate (Descriptions must include the circumstances and names of any employers who have refused to allow Outreach Workers to access MSFWs.).
- Carry and display, upon request, State identification and/or other identifying materials.
- Ensure that wages and working conditions offered to MSFWs are not less than the prevailing wages and working conditions among similarly employed farmworkers in the

area of intended employment or the applicable federal or state minimum wage, whichever is higher.

- Abstain from participation in political, unionization, or anti-unionization activities when performing Outreach Worker duties.

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

Outreach Workers are the primary access point to Maryland's workforce system for MSFWs. Outreach Workers must engage in outreach activities to locate and contact MSFWs who are not being reached by the normal intake activities conducted in and through AJCs.

Among the duties that Outreach Workers must accomplish:

Conduct pre-occupancy housing inspections or work with partner agencies to ensure pre-occupancy housing inspections are completed, as required by 20 CFR §653.501(3)(b). Note that Local Workforce Development Boards will be required to specify the party responsible for conducting MSFW housing inspections in their area in the Wagner Peyser section of their WIOA plan. 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. DLLR 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, DLLR 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

Some information in this section reflects the impact of Covid-19, Governor Hogan's Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic, social, labor market, and service delivery impact of COVID-19 in the out years of this plan is unknown.

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

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

The Maryland State Department of Education'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 AJC system in the Local Area.

MD Labor's Nondiscrimination Plan can be found here:

<http://www.labor.maryland.gov/employment/ndp/>.

All customers and employers will be served seamlessly in the American JobCenters. The USWIB will engage in good faith negotiations with the Maryland Division of Rehabilitation Services (DORS) representative to negotiate the DORS role in the Upper Shore One Stop system. The negotiations will take place through the One Stop Memoranda of Understanding and Resource Sharing Agreement and will include discussions regarding both Infrastructure and Operations of the One Stop system. Operation topics will include efforts to enhance the provision of services to individuals with disabilities, cooperative efforts to ensure staff have opportunities for training and technical assistance, determinations regarding the use of and sharing of information, and coordinated and collaborative efforts to include employer input and participation.

As with all individuals, whether they have a disability or not, who access the American Job Center, the goal is to have a universal referral mechanism, which will enable individuals to select the services they feel they need. In addition, the goal is to ensure that all information and services that are provided are accessible, regardless of the individual's disability. DORS will provide training to the partners in such areas as programmatic and physical accessibility, serving individuals with disabilities that require support services, disability etiquette, sensitivity training, and assistive technology.

Section 9: Temporary Assistance for Needy Families Functions

Some information in this section reflects the impact of Covid-19, Governor Hogan's Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic, social, labor market, and service delivery impact of COVID-19 in the out years of this plan is unknown.

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

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

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

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

The USWIB is committed to building upon its relationship with the Upper Shore Departments of Social Services, Caroline, and Queen Anne's County Departments of Social Services host American Job Center locations.

The One Stop Memoranda of Understanding and Resource Sharing Agreement negotiations include Infrastructure funding and the integration of Operations- Career and Training Services into the American Job Center system.

The USWIB will align with the Governor's Combined Plan submission, and incorporate the Benchmarks of Success objectives designed to remove barriers to employment:

The role for TANF in the One Stop system as specified in the WIOA Regulations, 678.430 is the starting point for TANF agency participation. Maximizing access to and use of life management skills and eliminating barriers to employment from those job seekers

receiving TANF grants will be the expertise social services organizations can provide.

The American Job Center is in two of the five county department of Social Services offices. The rural nature of the Upper Shore area leads to the smallest allocations of WIOA formula funds in the state; this is a compelling reason for all partners to work together efficiently and effectively to use our collective resources to provide opportunities for job seeker and employer customers.

B. A description of the implementation and coordination process to enhance the provision of services to individuals on TANF that includes:

- Potential co-location of LDSS and/or WIOA Partners at AJCs or LDSS depending on the nature of local partnerships and operations.
- Leverage existing financial and in-kind contributions to the WIOA system to ensure coordination of services provided by multiple programs, creating a seamless approach to delivering services.
- Cross train and provide technical assistance to all WIOA Partners about TANF.
- Ensure that activities are countable and tracked for the TANF Work Participation Rate.
- Access to business services and employer initiatives to attract and better serve employers by marketing joint services, minimizing the burden on employers who use the centers, and provide employer-focused services through a single point of entry rather than through all partnering programs; and
- Contribute and provide outcomes data to the WIOA system through strategies for collecting and reporting varied program reporting requirements.

WIOA Regulations, sections 678.430, 680.620 and 680.230 (a), 680.230(b) are the basis for the role of TANF in the Upper Shore One Stop system.

WIOA Regulations

"WIOA requires One-stop partners to deliver career services applicable to their specific program. This WIOA regulation clarifies that an applicable career service is a service identified in § 678.430 and is an authorized program activity. The TANF statute does not include a definition for career services. Accordingly, the TANF State grantees need to identify any employment services and related supports being provided by the TANF program (within the local area) that are comparable with the career services as described in WIOA Regulations§ 678.430. At a minimum, the TANF program partner must provide intake services at the one- stop for TANF assistance and non-assistance benefits via application processing and initial eligibility determinations." If an Information and Referral is the preference of the American Job Center Partners, the One Stop Operator will work with the Partners to set up and document the process or system.

WIOA Regulations 680.620:

"The local TANF program is a required partner in the one-stop delivery system. The WIOA Regulations, Part 678 describes the roles of such partners in the one-stop delivery system and it applies to the TANF program. TANF serves individuals who may also be served by the WIOA programs and, through appropriate linkages and referrals, these customers will have access to a broader range of services through the cooperation of the TANF program in the one-stop system. TANF participants, who are determined to be WIOA eligible, and who need occupational skills training may be referred through the One-stop system to receive WIOA training, when TANF grant and other grant funds are not available to the individual in accordance with WIOA Regulations § 680.230(a).

WIOA participants who are also determined TANF eligible may be referred to the TANF operator for assistance." Two of the five local Departments of Social Services organizations host and are co- located as the American Job Center in those counties. Kent, Dorchester, and Talbot counties support the AJC by delivering job club and other employment-related career services in those AJC locations.

WIOA Regulations, 680.230 A and 680.230 B:

"(a) WIOA funding for training is limited to participants who: (1) Are unable to obtain grant assistance from other sources to pay the costs of their training; or (2) Require assistance beyond that available under grant assistance from other sources to pay the costs of such training. Program operators and training providers must coordinate funds available to pay for training as described in paragraphs (b) and (c) of this section. In making the determination under this paragraph, one-stop operators should consider the full cost of participating in training services, including the cost of support services and other appropriate costs.

(b) One-stop operators must coordinate training funds available and make funding arrangements with one-stop partners and other entities to apply the provisions of paragraph (a) of this section. One-stop operators must consider the availability of other sources of grants to pay for training costs such as Temporary Assistance for Needy Families (TANF), State-funded training funds, and Federal Pell Grants, so that WIOA funds supplement other sources of training grants."

TANF customers are a priority group in the Upper Shore Priority of Service for WIOA Title I Adult Training funds. Once it is determined that TANF, Pell Grants and other sources of training funds are not available, the WIOA Title I Adult Priority of Service will take effect.

The USWIB will engage in good faith negotiations with the Maryland Department of Human Services representative(s) to negotiate the TANF role in the Upper Shore American Job Center system. The negotiations will take place through the One Stop Memoranda of Understanding and Resource Sharing Agreement negotiations. The negotiations will include Infrastructure and Operations of the American Job Center system.

As described in other sections, the USWIB through its One Stop Operator and AJC Professional Development Committee has facilitated several cross-training opportunities for American Job Center staff to learn about all core partner resource in the AJC, including TANF resources. Efforts will continue to enhance the information sharing about these resources including developing cooperative efforts with employers by providing information about TANF, and in professional development activities with frontline staff in the AJC.

- 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 five local DSS Directors nominate a local Director to represent TANF on the USWIB for a term; this person's information is then forwarded for approval to the local county government entity for appointment to the USWIB.

- 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 USWIB DHS representative will encourage the Board to support strategies developed in the American Job Center with core Partners to ensure that all customers receive skills assessment, access to credential training, life management skills, and assistance with placement in sustainable employment that will ultimately improve the financial status of those exiting the TANF program. One way the USWIB has made efforts toward this goal is to provide professional development to frontline staff. Professional Development allows an integrated approach to all AJC staff, so that a seamless delivery of services may be accomplished with all AJC partners.

Section 10: Community Services Block Grant

Some information in this section reflects the impact of Covid-19, Governor Hogan’s Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic, social, labor market, and service delivery impact of COVID-19 in the out years of this plan is unknown.

(A) A list of Community Service Block Grant (CSBG) providers in the Local Area and whether they provide employment and training activities. *Community Action Agencies are a partner in the local workforce development system, irrespective of whether they spend money on employment and training. A map of Maryland’s Community Action Agencies (CAAs) can be found here: <http://www.maryland-cap.org/member-map.aspx>.*

Community Action Agency	Address	County Served	WIOA Services
Maryland Rural Development Corporation	PO Box 4848 Annapolis, MD 21403	Caroline	Supportive Services for Chesapeake College Adult Education Class at Greensboro, MD
Delmarva Community Services	2450 Cambridge Beltway Cambridge, MD 21613	Dorchester	Information and Referral to American Job Center
Maryland Rural Development Corporation	PO Box 4848 Annapolis, MD 21403	Kent	Information and Referral to American Job Center
SHORE UP!	520 Snow Hill Road Salisbury, MD 21804	Queen Anne’s	Information and Referral to American Job Center
Neighborhood Service Center	126 Port Street Easton, MD 21601	Talbot	Information and Referral to American Job Center

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

- Potential co-location of CAAs and/or WIOA Partners at AJCs or CAAs depending on the nature of local partnerships and operations.

- Leverage existing financial and in-kind contributions to the WIOA system to ensure coordination of services provided by multiple programs, creating a seamless approach to delivering services.
- Cross train and provide technical assistance to all WIOA Partners about CSBG.
- Ensure that activities are countable and tracked for CSBG performance metrics.
- Access to business services and employer initiatives to attract and better serve employers by marketing joint services, minimizing the burden on employers who use the centers, and provide employer-focused services through a single point of entry rather than through all partnering programs; and
- Contribute and provide baseline outcomes data to the WIOA system through strategies for collecting and reporting varied program reporting requirements.

The Community Action Agencies in the Upper Shore do not provide employment and training activities for adults and dislocated workers as described in Section 3 of the Workforce Innovation and Opportunity Act.

To enhance understanding of the Community Action Agencies by American Job Center Partners and to enhance the understanding of the American Job Center Partners by the Community Action Agencies, the USWIB through its One Stop Operator, will invite Community Action Agency representatives to the American Job Center Partner meetings.

The USWIB, through its One Stop Operator and AJC Partner Professional Development Committee, will invite Community Action Agency staff to professional development opportunities in the Upper Shore.

The USWIB, through its One Stop Operator, will formalize an Information and Referral mechanism that will facilitate service delivery for Community Action Agencies customers by the American Job Center.

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

Delmarva Community Services, Inc, which includes Community Action Agency functions, has a representative on the USWIB appointed by the Dorchester County Council.

Section 11: Jobs for Veterans State Grants Functions

Some information in this section reflects the impact of Covid-19, Governor Hogan’s Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic, social, labor market, and service delivery impact of COVID-19 in the out years of this plan is unknown.

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

The American Job Center 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 USDOL funded programs, Priority of Service means access to services or resources earlier than others, or if resources are limited, it may mean access to services and resources instead of general service individuals.

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

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

In accordance with Maryland’s State Plan, veterans and eligible spouses will continue to receive priority of service for all USDOL-funded job training programs, which include WIOA programs. However, as described in TEGL 10-09, when programs are statutorily required to provide priority for a

particular group of individuals, such as the WIOA priority described below, priority must be provided in the following order:

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.

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.

Third, to veterans and eligible spouses who are not included in WIOA’s priority groups.

Last, to non-covered persons outside the groups given priority under WIOA.

1st Priority	Veterans and eligible spouses who are also low-income, recipients of public assistance and/or basic skills deficient
2nd Priority	Individuals who are not veterans or eligible spouses, are recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient
3rd Priority	Veterans and eligible spouses who did not meet "first priority" conditions
4th Priority	Individuals who are residents of the Upper Shore Local Area and who are not veterans and do not meet criteria to be considered a target population

Customer Service Flow for Veterans

AJC staff provides core services and initial assessments to veterans.

The receptionist or other AJC staff who work at the front desks are trained to determine whether any customers are veterans. Information can also be gathered on veteran status when the AJC front desk staff has customers complete their county’s “Customer Activity Sheet.” Customers who self-attest to veteran status shall receive priority of service from this point forward.

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

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

If the customer qualifies as SBE and requires intensive services to overcome a barrier to employment, AJC staff assists in setting up an appointment for them to meet with a Disabled Veteran Outreach Program (DVOP) Specialist.

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

Note: When a veteran seeks services at an AJC where the DVOP is not currently available because of their rotation schedule, the receptionist provides the customer with the card and contact information of the DVOP and contacts the DVOP via email to provide them with the contact information of the customer so the two can coordinate a meeting time when the DVOP will be stationed at the AJC, if desired. In addition, AJC staff offer assistance to the SBE veteran, eligible spouse and/or caregiver until appropriate hand-off can be made to the DVOP.

Verifying Veteran Status

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

Is to immediately undergo eligibility determination and must be registered or enrolled in a program;
or,

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 this verification is only necessary where a decision is made to commit outside resources to a covered person over another individual. For all other purposes, covered persons should be enrolled and provided immediate priority before providing verification as a covered person.

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

- Has been terminated or laid off or received a notice of termination or layoff from employment.
- Is eligible for, or has exhausted, unemployment insurance (UI) benefits.
- 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.
- 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.
- Is employed at a facility where the employer has made the general announcement that the facility will close within 180 days.
- Was self-employed but is unemployed as a result of general economic conditions in the community or because of a natural disaster.
- Is a displaced homemaker as defined by WIOA 3(16); or,
- Is the spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of Title 10, U.S.C.), and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member; or is the spouse of a member of the Armed Forces on active duty and is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

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

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

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

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

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

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

Monitoring Priority of Service

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

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

Local Veterans Employment Representatives (LVER) conduct outreach to employers and engage in advocacy efforts with hiring executives to increase employment opportunities for veterans and encourage the hiring of veterans. The RLVER, in conjunction with the local LVERs, will promote LVER services through social media, job fairs, flyers and related postings, and email blasts. The Local Board will include the LVER in employer meetings convened in support of determining employer needs related to Career Services, Training Services, or Educational Services. The LVER will be included in meetings and efforts convened by and on behalf of the AJC Partners, including meetings and efforts convened by the One Stop Operator.

Section 12: Trade Adjustment Assistance for Workers Program Functions

Some information in this section reflects the impact of Covid-19, Governor Hogan's Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic, social, labor market, and service delivery impact of COVID-19 in the out years of this plan is unknown.

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

Trade Adjustment Assistance Employment and case management services include:

- Interview and review training opportunities for each trade-affected worker;
- Inform trade-affected workers of the services and allowances available;
- Register in Maryland Workforce Exchange and complete Trade Adjustment Assistance application;
- Provide initial assessments;
- Development of an Individual Employment Plan with the affected worker;
- Help them secure appropriate training;
- Monitor their training progress;
- Devise a training waiver process;
- Provide access to workshops and other employment resources;
- Coordinate other employment benefits that workers may be eligible for;
- Inform trade-affected workers about supportive services available through partner programs;
- Co-enrollment with Adult, Dislocated Worker, or other appropriate partner program to provide comprehensive wrap-around services and reduce barriers;
- Rapid Response Services;
- Follow-up Services;

- Facilitate the early filing of petitions for any workers that are likely to be eligible for benefits under the Trade Act; and
- Perform outreach to affected workers, intake of, and orientation for adversely affected.

workers and adversely affected incumbent workers covered by a certification.

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

USDOL's Trade Adjustment Assistance Final Rule can be found here: https://www.dol.gov/sites/dolgov/files/ETA/tradeact/pdfs/TAA_Final_Rule_1205_AB78.pdf.

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

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

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

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.

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

By following an established process flow within the AJC, co-enrollment of Trade affected workers will be ensured to allow for more efficient use of public workforce system resources and reduce barriers to program integration. Participants will be made aware of their co-enrollment. In the event that a Trade affected worker declines co-enrollment or is not eligible for co-enrollment, documentation must be provided and maintained. Declining co-enrollment has no effect on eligibility for benefits and services under the TAA Program.

Section 13: Unemployment Insurance Functions

Some information in this section reflects the impact of Covid-19, Governor Hogan’s Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic, social, labor market, and service delivery impact of COVID-19 in the out years of this plan is unknown.

(A) A description of how WIOA Title I and Title III partners will support Unemployment Insurance claimants and provide meaningful access to Unemployment Insurance claimants, as required by WIOA.

Several years ago, the State of Maryland entered into a contract to upgrade and modernize the state’s unemployment insurance system, as used by both employers and claimants. The COVID-19 pandemic, Governor Hogan’s Emergency Order, and the Coronavirus Aid, Relief and Economic Security (CARES) Act caused the planned activation of the new system, known as BEACON, to be advanced. This upgrade and modernization rendered the knowledge that Upper Shore Scholarship Office staff had of the Unemployment Insurance application and appeals process obsolete.

In support of BEACON and the overwhelming increase in Unemployment Insurance applications, the State created and posted several tutorial videos about the BEACON system.

The Upper Shore Scholarship Staff (Title I) will become familiar with the tutorial videos and provide the following Career Services information related to filing claims for Unemployment Insurance through the BEACON system to Customers seeking Title I Training Services.

- Ask if the Applicant has applied Unemployment Insurance.
- Ask if the Applicant is receiving Unemployment Insurance.
- Ask if the Applicant is aware of the BEACON tutorial videos.
- Provide the Applicant with the link to the web page where the tutorial videos are posted <https://www.dlir.state.md.us/employment/unemployment.shtml>
- Create a case note in the Maryland Workforce Exchange documenting that the Applicant was provided information about the BEACON tutorial videos.

Title III staff have access to BEACON and were provided with a professional development opportunity entitled “Introduction to BEACON 2.0 for Workforce Development”, November 23, 2020 by Tamara Galloway, Laurie Troop-Curtis, and Annelise Moats from the UI Training Department. With the knowledge of the BEACON system that Title III staff has acquired, the staff provide the following assistance to Customers inquiring about filing claims for Unemployment Insurance benefits, or seeking a status update regarding a filed claim:

- Advise the customers of tools and resources, such as BEACON tutorials and UI contact information, available to them via the Unemployment Insurance webpage, found at <https://www.dllr.state.md.us/employment/unemployment.shtml>
- Offer assistance with navigating through the claimant portal.
- Offer assistance by explaining some of the notations found in the claimant portal.

(B) A description of the **how** 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.

Wagner-Peyser staff, hired as RESEA or ROW facilitators, provide workshops to unemployment insurance claimants. Workshops are designed to offer career service assistance in an effort to facilitate the customer's return to work. The goal is to reduce the length of time the customer receives unemployment insurance benefits. During the course of the workshop, customers are presented information covering an array of services, tools, and techniques such as Labor Market Information, resume and cover letter preparation, job searching, and interviewing assistance. Much of the assistance is made available through the Maryland Workforce Exchange (MWE), so customers are provided an introduction to the MWE system and the many features contained therein. It should be noted that during the COVID-19 Pandemic, workshops have been provided virtually to customers.

RESEA/ROW workshops are valuable recruitment tool for WIOA Title I Training Services. As such, the Upper Shore Scholarship Office staff will provide information about accessing training and the training intake process to RESEA/ROW workshop participants. As this plan is written, the Covid-19 pandemic and Governor Hogan's Emergency Orders have resulted in services being delivered virtually. Upper Shore Scholarship Office staff have participated in video conference RESEA/ROW workshops to promote training as a reemployment strategy.

When Governor Hogan rescinds the COVID-19 Emergency Orders, Upper Shore Scholarship Office staff and Title III staff will work together to determine the most efficient and effective mechanism to further provide information about training to RESEA/ROW workshop participants. At a minimum, the Upper Shore Scholarship Office staff will provide written material with the training eligibility process for distribution to workshop participants. Until then, Title III workshop facilitators will continue to provide information about the availability of workforce training, and the subsequent contact information, as a standard component of the RESEA/ROW workshop presentation.

Section 14: Senior Community Service Employment Program Function

Some information in this section reflects the impact of Covid-19, Governor Hogan's Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic, social, labor market, and service delivery impact of COVID-19 in the out years of this plan is unknown.

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.

1. MD Labor DWDAL 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.
MD Labor is responsible for administering the SCSEP program in the Upper Shore Counties- Caroline, Dorchester, Kent, and Queen Anne's.
2. Senior Services America, Inc. is the National Grantee and utilizes sub-grantees to implement SCSEP. MAC, Inc, a Senior Services America sub-grantee is responsible for administering the SCSEP program in Dorchester County.

B. A description of how SCSEP services will be provided in the AJC system within the Local Area. Include the components of the SCSEP program that are offered in the Local Area.

Caroline, Kent, Queen Anne's, and Talbot Counties

SCSEP utilizes the American Job Center's system by having participants register with the Maryland Workforce Exchange to track progress in narrowing job interest, host agency search, and employment search. The employment specialist uses the Maryland Workforce Exchange to track the participants' progress and maintain case notes for each participant.

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

Dorchester County

When inquiring about SCSEP at an American Job Center, the applicant meets with the employment specialist and is assisted with registering in the Maryland Workforce Exchange. The applicant is referred to MAC, Inc for intake, assessment, and placement.

Section 15: WIOA Section 188 and Equal Opportunity Functions

Some information in this section reflects the impact of Covid-19, Governor Hogan’s Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic, social, labor market, and service delivery impact of COVID-19 in the out years of this plan is unknown.

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

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

Daniel P. McDermott, Executive Director
EDC -01 Chesapeake College, Wye Mills
PO Box 8
Wye Mills, MD 21679
dmcdermott@chesapeake.edu
410-822-1716 x 2271
TTY: 1-800-735-2258

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

The American Job Center Partners connect employment and training system services, including WIOA and other community resources, to persons with disabilities by ensuring that all workforce offices are ADA compliant and that auxiliary aids are made available when requested by customers receiving services. The American Job Center Partners distribute and post required notices to ensure all eligible registrants and applicants are aware of the system's obligations to operate programs in a non-discriminatory manner.

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

- Section 504 of the Rehabilitation Act, which prohibits discrimination against individuals with disabilities by recipients of Federal financial assistance.
- Title I of the ADA, which prohibits discrimination in employment based on disability.
- Title II of the ADA, which prohibits State and local governments from discriminating based on disability.
- Section 427 of the General Education Provisions Act; and
- Maryland Anti-Discrimination laws, including 5 Md. STATE GOVERNMENT Code Ann. §10-1101, which stipulates that oral language services must be delivered on-site for those in frequent contact with a service provider.

The USWIB acknowledges that it is subject to Section 188 of WIOA and 29 CFR Part 38 and may also be subject to the rules and regulations bulleted above.

(D) A description of how the Local Board will ensure meaningful access to all customers.

The USWIB in its oversight of the WIOA Title I operations, will ensure staff are providing meaningful access to resources and services as described by the Equal Employment Opportunity Commission. All WIOA core Partners will be encouraged to provide meaningful access to those with Limited English Proficiency, which is described as "Language assistance that results in accurate and effective communication at no cost to the LEP individual". For LEP individuals: meaningful access denotes access that is not significantly restricted or inferior compared to programs or services provided to English proficient individuals.

The USWIB will use its designated Equal Opportunity Officer and its One Stop Operator to understand, implement, investigate, and remedy any equal access issues that arise.

(E) A description of the Local Board's procedures for handling grievances and complaints from participants and other interested parties affected by the local AJC system, including partners and service providers. Federal regulation on grievances and complaints can be found at: 29 CFR 38.69-97. Provide a separate description for the:

- Complaints alleging discrimination on the ground of race, color, religion, sex, national origin, age, disability, political affiliation, or belief, and for beneficiaries only, citizenship or participation in any WIOA Title I – financially assisted program or activity.
- Complaints and grievances not alleging illegal forms of discrimination. This includes grievances from individuals alleging labor standards violations; and
- Remedies that may be imposed for a violation of any requirement under WIOA Title I, limited to, suspension or termination of payments under the title; prohibition of placement of a participant with an employer that has violated any requirement under WIOA Title I; reinstatement of an employee, payment of lost wages and benefits, and reestablishment of

other relevant terms, conditions, and privileges of employment (where applicable); and other equitable relief as appropriate.

The USWIB has designated the USWIB Executive Director as the grievance and complaint officer for compliance with Equal Opportunity (EO) for the USWIB itself. The USWIB role related to EO in the One Stop system is to designate an EO Officer to act in an Information and Referral role with the EO Officers designated for each American Job Center Partner. The USWIB will determine the role of the One Stop Operator in the implementation of Equal Opportunity and may include the EO Information and Referral functions in the RFP for the One Stop Operator. If the USWIB does not include the functions in the One Stop Operator RFP, the USWIB will designate an EO Officer for the American Job Center Information and Referral role.

- The Executive Director of the USWIB, the designated EO Officer, will facilitate complaints alleging illegal discrimination on the grounds of race, color, religion, sex, national origin, age, disability, political affiliation, or belief.
- The EO Officer of the agency or entity that is the employer of record for the alleged discriminator will investigate the written complaint.
- The Executive Director of the USWIB will facilitate complaints and grievances not alleging illegal forms of discrimination including labor standards violations. The EO Officer of the agency or entity that is the employer of record for the alleged discriminator will investigate the written complaint. The United States Equal Opportunity Commission provides the following information about remedies for discrimination. These remedies will be considered as appropriate remedies in Upper Shore area.
- Whenever discrimination is found, the goal of the law is to restore the victim of discrimination to the same position (or nearly the same) that he or she would have been if the discrimination had never occurred.
- The types of relief will depend upon the discriminatory action and the effect it had on the victim. For example, if someone is not selected for a job or a promotion because of discrimination, the remedy may include placement in the job and/or back pay and benefits the person would have received.
- The employer also will be required to discontinue any further identified discriminatory practices and document the necessary steps that will prevent discrimination in the future.
- A victim of discrimination may also be eligible to recover attorney's fees, expert witness fees, and court costs.

The USWIB in its role as convener of the American Job Center system will facilitate EO

concerns for AJC Partners based on the chart below. The USWIB Executive Director will be responsible for assisting a complainant with identifying the EO Officer for an AJC Partner.

Partner	Expertise	EO Responsibility
USWIB	LWDB, Local Plan, MOU/RSA, OSO, Title I	Executive Director USWIB/Designated EO Officer
Title I	Adult Services, Youth Services	Adult/Youth: Executive Director USWIB/Designated EO Officer HR: Chesapeake College Human Resources Director
Title II	ABE, ASE ESOL	Chesapeake College Human Resources Director
Title III	Wagner- Peyser	Director and ADA/504 Officer
Title IV	Rehabilitation Act of 1973 Amended	Maryland State Department of Education Agency Equity Officer
TANF	Social Security Act Part A Title IV	Director Office of Employment and Program Equity
Trade Act	Trade Adjustment Assistance Reauthorization Act of 2015	Director and ADA/504 Officer
Jobs for Veterans State Grant	Jobs for Veterans Act of 2002	Director and ADA/504 Officer
Migrant and Seasonal Farmworkers	Workforce Innovation and Opportunity Act	Director and ADA/504 Officer
Unemployment Insurance	Unemployment insurance provides workers, whose jobs have been terminated through no fault of their own, monetary payments for a given period of time or until they find a new job.	Director and ADA/504 Officer
Senior Community Services Employment Program	Title V of the Older Americans Act	Director and ADA/504 Officer Director MAC, Inc
Community Services Block Grant	Community Services Block Grant Act	Director Office of Fair Practices
Perkins Act	Carl D. Perkins Vocational and Technical Act	Chesapeake College Director of Human Resources

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

A Customer may request an accommodation by contacting:
Daniel P. McDermott, Executive Director
EDC -01 Chesapeake College, Wye Mills

PO Box 8
Wye Mills, MD 21679
dmcdermott@chesapeake.edu
410-822-1716 x 2271
TTY: 1-800-735-2258

(G) A description of the Local Board’s policy and procedures about 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.

The United States Equal Employment Opportunity Commission, United States Department of Justice Civil Rights Division, Americans with Disabilities Act Questions and Answers defines reasonable accommodation as any modification or adjustment to a job or work environment that will enable a qualified applicant or employee with a disability to participate in the application process or to perform essential job functions. Reasonable accommodation also includes adjustments to ensure that a qualified individual with a disability has rights and privileges in employment equal to those of employees without disabilities. The USWIB through the Upper Shore Workforce Investment Board Administrative Agreement uses the Chesapeake College hiring, employment and policies related to Equal Opportunity.

If a USWIB member or a member of the public requests an accommodation relative to a USWIB specific activity, for example, a USWIB meeting, the Executive Director will be responsible for determining reasonable accommodation.

Reasonable Accommodation in the American Job Centers will be addressed by the American Job Center Partners in the Memoranda of Understanding through the designation of a fiscal agent for the American Job Center location.

The USWIB will include grant assurances with all WIOA contracts for consultants, vendors and sub- recipients that include reasonable accommodation as an assurance.

The USWIB will review all vendors included on the Eligible Training Provider List and used by Upper Shore funded training customers to verify that training vendors have a reasonable accommodation policy.

Description of compliance with ADA

The United States Equal Employment Opportunity Commission, United States Department of Justice Civil Rights Division, Americans with Disabilities Act, Questions and Answers articulate that the Americans with Disabilities Act prohibits discrimination in all employment practices, including job application procedures, hiring, firing, advancement,

compensation, training, and other terms, conditions, and privileges of employment. It applies to recruitment, advertising, tenure, layoff, leave, fringe benefits, and all other employment-related activities.

The USWIB through the Upper Shore Workforce Investment Board Administrative Agreement with Chesapeake College places employment practices under the policies of Chesapeake College.

Description of policy to ensure communication for visual and hearing impairments:

Visual and hearing impairments are a sub-group of disabilities; reasonable accommodation will be implemented with the goal of communicating effectively.

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

Section 794. Nondiscrimination under Federal grants and programs; promulgation of rules and regulations

(a) Promulgation of rules and regulations

No otherwise qualified individual with a disability in the United States, as defined in section 705 (20) of the Rehabilitation Act of 1973, shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance or under any program or activity conducted by any Executive agency or by the United States Postal Service. The head of each such agency shall promulgate such regulations as may be necessary to carry out the amendments to this section made by the Rehabilitation, Comprehensive Services, and Development Disabilities Act of 1978. Copies of any proposed regulations shall be submitted to appropriate.

(b) "Program or activity" defined.

For the purposes of this section, the term "program or activity" means all the operations of --

(I)(A) a department, agency, special purpose district, or other instrumentality of a State or of a local government; or

(B) the entity of such State or local government that distributes such assistance and each such department or agency (and each other State or local government entity) to which the assistance is extended, in the case of assistance to a State or local government.

(2)(A) a college, university, or other postsecondary institution, or a public system of higher education; or

(B) a local educational agency (as defined in section 8801 of Title 20), system of vocational education, or other school system.

(3)(A) an entire corporation, partnership, or other private organization, or an entire sole proprietorship --

(i) if assistance is extended to such corporation, partnership, private organization, or sole proprietorship as a whole; or

(ii) which is principally engaged in the business of providing education, health care, housing, social services, or parks and recreation; or

(B) the entire plant or other comparable, geographically separate facility to which Federal financial assistance is extended, in the case of any other corporation, partnership, private organization, or sole proprietorship; or

(1) any other entity which is established by two or more of the entities described in paragraph (I), (2) or (3); any part of which is extended Federal financial assistance.

(c) Significant structural alterations by small providers

Small providers are not required by subsection (a) to make significant structural alterations to their existing facilities for the purpose of assuring program accessibility, if alternative means of providing the services is available. The terms used in this subsection shall be construed with reference to the regulations existing on March 22, 1988.

(d) Standards used in determining violation of section.

The standards used to determine whether this section has been violated in a complaint alleging employment discrimination under this section shall be the standards applied under title I of the Americans with Disabilities Act of 1990 (42 U.S.C. 12111 et seq.) and

the provisions of sections 501 through 504, and 510, of the Americans with Disabilities Act of 1990 (42 U.S.C. 12 201- 12204 and 12210), as such sections related to employment.

Section 794a. Remedies and attorney fees

(a) (l) The remedies, procedures, and rights set forth in section 717 of the Civil Rights Act of 1964 (42 U.S.C. 2000e-16), including the application of sections 706(f) through 706 (k) [42 U.S.C. 2000e-5(f) through k)] shall be available, with respect to any complaint under section 791 of this title, to any employee or applicant for employment aggrieved by the final disposition of such complaint, or by the failure to take final action on such complaint. In fashioning an equitable or affirmative action remedy under such section, a court may consider the reasonableness of the cost of any necessary workplace accommodation, and the availability of alternative therefor or other appropriate relief to achieve an equitable and appropriate remedy.

(2) The remedies, procedures, and rights set forth in title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq) shall be available to any person aggrieved by any act or failure to act by any recipient of Federal assistance or Federal provider of such assistant under section 794 of this title.

(b) In any action or proceeding to enforce or charge a violation of a provision of this subchapter, the e court, in its discretion, may allow the prevailing party, other than the United States, a reasonable attorney's fee as part of the costs.

The USWIB will work with the Upper Shore One Stop Operator to identify staff training needs and implement staff training as professional development for the Upper Shore American Job Center network.

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

AUXILIARY AIDS AND SERVICES FOR PERSONS WITH DISABILITIES

The USWIB will take appropriate steps to ensure that persons with disabilities, including persons who are deaf, hard of hearing, or blind, or who have other sensory or manual impairments, have an equal opportunity to participate in our services, activities, programs, and other benefits. The procedures outlined below are intended to ensure effective communication with patients/ clients involving their medical conditions,

treatment, services, and benefits. The procedures also apply to, among other types of communication, communication of information contained in important documents, including waivers of rights, consent to treatment forms, financial and insurance benefits forms, etc. All necessary auxiliary aids and services shall be provided without cost to the person being served.

All staff will be provided written notice of this policy and procedure, and staff that may have direct contact with individuals with disabilities will be trained in effective communication techniques, including the effective use of interpreters.

PROCEDURES:

1. Identification and assessment of need:

The USWIB provides notice of the availability of and procedure for requesting auxiliary aids and services through notices on our letterhead and email signature. When an individual self-identifies as a person with a disability that affects the ability to communicate or to access or manipulate written materials or requests an auxiliary aid or service, staff will consult with the individual to determine what aids or services are necessary to provide effective communication in particular situations.

2. Provision of Auxiliary Aids and Services:

The USWIB shall provide the following services or aids to achieve effective communication with persons with disabilities:

A. For Persons Who Are Deaf or Hard of Hearing

(i) For persons who are deaf/hard of hearing and who use sign language as their primary means of communication, the Equal Opportunity Officer, 410-822-1716 is responsible for providing effective interpretation or arranging for a qualified interpreter.

If an interpreter is needed, the Equal Opportunity Officer, 410-822-1716 is responsible for:

Maintaining a list of qualified interpreters on staff showing their names, phone numbers, qualifications, and hours of availability or

Contacting the appropriate interpreter on staff to interpret, if one is available and qualified to interpret; or

Obtaining an outside interpreter if a qualified interpreter on staff is not available. TCS

Interpreting has agreed to provide interpreter services.

(ii) Communicating by Telephone with Persons Who Are Deaf or Hard of Hearing

The USWIB utilizes relay services for external telephone with TTY users. We accept and make calls through a relay service. The state relay service number is 7-1-1.

(iii) For the following auxiliary aids and services, staff will contact Equal Opportunity Officer who is responsible to provide the aids and services in a timely manner:

Note-takers; computer-aided transcription services; telephone handset amplifiers; written copies of oral announcements; assistive listening devices; assistive listening systems; telephones compatible with hearing aids; closed caption decoders; open and closed captioning; telecommunications devices for deaf persons (TDDs); videotext displays; or other effective methods that help make aurally delivered materials available to individuals who are deaf or hard of hearing.

Some persons who are deaf or hard of hearing may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the person will not be used as interpreters unless specifically requested by that individual and after an offer of an interpreter at no charge to the person has been made by the facility. Such an offer and the response will be documented in the person's file. If the person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided.

NOTE: Children and other residents will not be used to interpret, to ensure confidentiality of information and accurate communication.

B. For Persons Who are Blind or Who Have Low Vision

(i) Staff will communicate information contained in written materials concerning treatment, benefits, services, waivers of rights, and consent to treatment forms by reading aloud and explaining these forms to persons who are blind or low vision.

(ii) For the following auxiliary aids and services, staff will contact Equal Opportunity Officer 410-822- 1716 who is responsible to provide the aids and services.

Qualified readers; reformatting into large print; taping or recording of print materials not available in alternate format; or other effective methods that help make visually delivered materials available to individuals who are blind or who have low vision. In addition, staff

are available to assist persons who are blind or who have low vision in filling out forms and in otherwise providing information in a written format.

C. For Persons With Speech Impairments

To ensure effective communication with persons with speech impairments, staff will contact Equal Opportunity Officer 410-822-1716/ who is responsible to provide the aids and services in a timely manner:

D. For Persons With Manual Impairments

Staff will assist those who have difficulty in manipulating print materials by holding the materials and turning pages as needed, or by providing one or more of the following:

Note-takers; computer-aided transcription services; speakerphones; or other effective methods that help to ensure effective communication by individuals with manual impairments. For these and other auxiliary aids and services, staff will contact Equal Opportunity Officer 410-822-1716 who is responsible to provide the aids and services in a timely manner.

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

The United States Department of Labor (USDOL) has resources available for grant recipients through its Limited English Proficient (LEP) Toolkit. The USWIB will encourage all One Stop Partners to take advantage of the USDOL LEP Toolkit to address language needs in the American Job Centers. The USWIB recognizes that federal agencies may have similar toolkits and resources available for grant recipients other than USDOL recipients. The USWIB will include LEP language in the Memoranda of Understanding negotiations and ensure that LEP is addressed in the agreement.

The United States Census Bureau provides data on “Language Spoken at Home”. The data in the table below is from the 2019 American Community Survey.

Language	Caroline County	Dorchester County	Kent County	Queen Anne's County	Talbot County
English Only	24302	23782	15306	36554	28024
Spanish	560	571	208	426	458
Other Language	243	259	297	885	625
Percentage English	96%	97%	97%	97%	96%
Percentage Spanish	2%	2%	1%	1%	2%
Percentage Other Language	2%	1%	2%	2%	1%

The USWIB will review American Fact Finder data on an annual basis to determine the LEP impact on the delivery of services and provide information to the American Job Center Partners to assist in integrating LEP customers.

"...a requirement of translation of vital documents ordinarily provided to the public into any language spoken by any limited English proficient population that constitutes 3% of the overall population with the geographic area serviced by a local office a state program as measured by the United States Census (MD State Government Ann 10-1033(b)(2i))"

"...the purpose of the LEP Plan is not to create new services but to eliminate or reduce limited English proficiency as a barrier or impediment to accessing ...core services."

Languages identified in a particular area that constitute 3% or more spoken by the local population must have vital documents available in the translated language. DLLR OFP describes "vital documents in the Agency's LEP Plan as the following:

"Vital documents" are documents that convey information that critically affects the ability of the program recipient to make decisions about his or her participation in the program. Vital documents include/ but are not limited to applications/ public notices/ consent forms/ letters containing important information regarding participation in a program/ eligibility

rules notices pertaining to the reduction denial or termination of benefits/ right to appeal notices advising the availability of language assistance and outreach and community education materials. "

" Regulations also provide the following:

(g) With regard to vital information: (1) ...must translate vital information in written materials into these languages and make the translations readily available in hard copy upon request, or

Electronically such as on a web site and ...for those languages not significantly represented the program must take reasonable steps to meet the particularized language needs of LEP individuals " Thus, efforts to translate USWIB program "vital documents" in Spanish are underway to ensure that Limited English Proficient (LEP) and language applicants and learners receive the resources they will need to apply, engage and participate in training programs.

The USWIB has developed an ambitious professional development plan that will include training frontline AJC staff for compliance regarding the inclusion of oral interpretation and written translation services in accordance with 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. The USWIB has contracted with the following vendors to ensure these services will be available as needed:

TSI Interpreting, Inc: www.tcsinterpreting.com

Language Line Solutions, Inc: www.language.com

Schreiber Translations, Inc: www.schreibernet.com

Maryland Department of Budget and Management's (DBM) Statewide Foreign Language Interpretation/Translation Services (FLITS) resources represent that these service providers are approved vendors procured through the state of Maryland, and offer on-site oral and written services, as well as video chat formats available for remote or rural location.

Section 16: Fiscal, Performance and Other Functions

Some information in this section reflects the impact of Covid-19, Governor Hogan's Emergency Orders, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus and Relief Supplemental Appropriations Act of 2021. As this plan is written, Covid-19 is dominating many aspects of life. The economic, social, labor market, and service delivery impact of COVID-19 in the out years of this plan is unknown.

- (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 USWIB has two documents related to the disbursement of grant funds.

- The County/USWIB Agreement specifies that the USWIB will use Chesapeake College as its Fiscal Agent.
- The USWIB/College Agreement specifies that the USWIB will use Chesapeake College policies related to the fiscal management of WIOA funds.

The USWIB and Chesapeake College are audited each year by a procured independent audit firm. The Chesapeake College fiscal system is validated by the audit and the USWIB compliance with the Chesapeake College fiscal policies is validated.

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

The USWIB believes that projected funding levels are sufficient to fulfill its responsibility to create a local plan, procure a One Stop Operator and insure that WIOA Title I services take place in comprehensive and satellite American Job Centers.

If funding levels decrease and service delivery is impacted, the USWIB will institute best practices from the virtual service delivery that was instituted during the Covid19 pandemic and Governor Hogan's Emergency Order.

WIOA Section 107 Local Workforce Development Boards (d)(7)(B) encourages the USWIB to evaluate the use of technology to bring services to remote areas. Prior to the COVID-19 pandemic and Governor Hogan's Emergency Order, the USWIB was able to accomplish service delivery in a face-to-face manner. The USWIB will rely on a technology driven service delivery to sustain services when financial resources decrease.

If Title I funds increase significantly, the USWIB will be judicious in its budgeting to favor expanding services for Customers rather than increasing infrastructure expenditures.

- (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.

The USWIB, through the USWIB/Chesapeake College Agreement, uses the College's procurement policies.

The College purchasing dollar thresholds are:

Under \$ 5, 000

One quote verbal or written.

Over \$ 5,000 – Under \$ 25,0000

Three written quotes

Over \$ 25,000

Competitive sealed bids/proposals

Purchasing Procedures

Chesapeake College

General policy

Chesapeake College purchases will be conducted via cost center-initiated requisitions to the Purchasing Department. The Purchasing Department is charged with conducting the purchasing function to obtain the greatest benefit for the college and in accordance with ethical practices as prescribed by the purchasing profession and consistent with governmental procurement policies as they apply to community colleges in the State of Maryland.

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

Governor's Workforce Development Board Policy Issuance 2017-01	Upper Shore Workforce Investment Board
Membership	Covered in Multi County Agreement available at www.uswib.org "USWIB Documents" tab
Appointment of Members	Covered in Multi County Agreement available at www.uswib.org "USWIB Documents" tab
Local Board Chairperson	Covered in Multi County Agreement available at www.uswib.org "USWIB Documents" tab
Standing Committees	Covered in USWIB By Laws available at www.uswib.org "USWIB Documents" tab
Reporting	Information is available at www.uswib.org
Strengthen the Local System	The USWIB funds Professional Development opportunities for American Job Center Partners and contracts with Chesapeake College to provide Continuing Education Units
Local Plans	Plans are available at www.uswib.org "USWIB Documents" tab
Convening and Employer Engagement	Program Advisory Groups; Local Advisory Council
Career Pathways Development and Coordination with Education Providers	USWIB is working to convene as the Local Advisory Council for Perkins Secondary and Post-Secondary
Proven and Promising Practices	USWIB Members attend the National Association of Workforce Boards Forum each year to learn about best practices and trends in workforce development
Technology	USWIB Members attend the National Association of Workforce Boards Forum each year to learn about best practices and trends in workforce development
Program Oversight	USWIB Members receive information on numbers served, funding spent and performance at every meeting. Performance information is available at www.uswib.org

The USWIB is a member of the National Association of Workforce Boards (NAWB). A NAWB membership provides the USWIB with access to a national network of best practices, board development resources and technical assistance. The USWIB will maintain its NAWB membership and take advantage of resources related to high performing boards.

The USWIB, through its NAWB membership, will take advantage of resources and technical assistance related to the review and evaluation of American Job Centers, as well as the resources and technical assistance related to the review and evaluation of the One Stop Operator.

The USWIB will determine if sufficient local funds are available for technical assistance. If local resources are not sufficient to fund the technical assistance needs of the USWIB, the American Job Centers or the One Stop Operator, a technical assistance-funding request will be created and sent to the Governor's Workforce Development Board.

One Stop Operator oversight is accomplished by the requirement of a monthly written report that must be provided to the USWIB members before the One Stop Operator invoice is processed for payment. In addition, the One Stop Operator is required by contract to report in person at each USWIB meeting. A representative of the USWIB and/or the Executive Director attends each meeting/event implemented by the One Stop Operator.

The One Stop Operator assists the USWIB in evaluating the American Job Centers by reporting on the status of service delivery in comparison to the American Job Center Memorandum of Understanding. Any shortcomings or nonperformance related to the Memorandum of Understanding is reported to the USWIB for discussion and resolution.

- (E) A description, including a copy of the Local Area's Individual Training Account policy. The description should include information such as selection process, dollar limits, duration, etc. and must be in accordance with the State's WIOA Title I Training and the Eligible Training Provider List policy found at: <http://www.labor.maryland.gov/employment/mpi/mpi9-17.pdf>.

Customers seeking training funds will be subject to choosing training courses approved for use by inclusion on the state's Eligible Training Provider List. In some instances, Eligible Training Providers in another state may better serve participants. The Upper Shore Scholarship Office will use an Individual Training Account process and will allow customers to attend training in another state if the training selected by the Customer in accordance with WIOA regulations 20 CFR 680.210 b and 20 CFR 680.340 and is on that state's Eligible Training Provider List.

Priority of Service policy set aside for target populations in WIOA Adult program

- Training that provides a qualification for a job in demand in the local region.
- Courses or curricula approved under the Eligible Training Provider List
- \$ 4,500 Training Tuition Costs Cap
- Duration of training relevant to Employment Development Plan

(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.

In the delivery of training for its Customers, the USWIB will ensure that customer choice is the basis for the training decision. The USWIB may find that customers will benefit from:

- Training Scholarship Vouchers for Occupational Skills Coursework: Individual Training Account
- On-the-Job Training: Contractual service with employer
- Customized Training: Contractual service with training vendor
- Incumbent Worker Training: Individual Training Account or contractual service with vendor
- Transitional Employment: Temporary employment contractor
- Training by Community Based Organizations or other organizations to serve individuals with barriers to employment: Contractual service with vendor.
- Experiential learning contracts for internships and externships: Temporary employment contractor

Training undertaken through any of the above strategies will reflect the local in-demand industries and sector, and/or a career pathway and will be subject to the Priority of Service policy for Adults.

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

The Maryland Workforce Exchange (MWE) is the labor exchange, case management and performance accountability backbone for the American Job Centers. The Upper Shore One Stop Operator contract will include the use of MWE as a deliverable, assigning responsibility for determining which partners are using MWE and for what purpose(s). The USWIB will advocate extending the full range of MWE capabilities to all One Stop MOU Partners, and other employment and training partners who have a written data sharing agreement with the USWIB. The USWIB believes that access to MWE by job seeker customers, by employer customers for labor exchange, and access to MWE by One Stop

Partners and other employment and training partners for case management and performance accountability is the true definition of a One Stop system.

The USWIB will encourage and support the integration of labor exchange, case management and performance accountability toward the common technology platform- the Maryland Workforce Exchange.

(H) A description of the Local Board's procedures for conducting oversight and monitoring of its WIOA activities and those of its subgrantee and contractors. *DWDAL's policy on monitoring can be found here: <http://www.labor.maryland.gov/employment/mpi/mpi7-19.pdf>*. The monitoring plan shall address the monitoring scope and frequency and shall include the following:

- The roles and responsibility of staff in facilitating this procedure.
- A requirement that all subgrantee agreements and contracts be monitored at least annually.
- Procedures for determining that expenditures have been made against the cost categories and within the cost limitations specified in the Act and WIOA regulations.
- Procedures for determining compliance with other provisions of the Act and regulations and other applicable laws and regulations, including the method of monitoring to be used for subgrantees and contractors.

Monitoring risk factors and risk assessments.

- Provisions for the recording of findings made by the recipients' monitor(s), the forwarding of such findings to the subgrantee or contractor for response and the recording of all corrective actions.
- Provisions of technical assistance as necessary and appropriate; and
- Specific local policies developed by the Local Board for oversight of the AJC system, youth activities and employment and training activities under Title I of WIOA.

The USWIB will provide oversight of Title I WIOA implementation by reviewing program and fiscal monitoring letters from the Maryland Department of Labor. The USWIB will provide oversight of Title I WIOA implementation by reviewing and accepting the single audit performed each year by an independent audit firm. The USWIB will review and accept the federal performance outcomes each year when the final report becomes available.

The USWIB will review written documentation of the United States Department of Labor Title I audit, or monitoring should such activities take place in the Upper Shore area.

- The USWIB may delegate oversight and monitoring to Upper Shore Scholarship Office staff.
- All sub recipient agreements will be monitored annually.
- Fiscal monitoring will be based on the Uniform Grant Guidance, WIOA and the WIOA Regulations, USWIB policies and the written agreement between the USWIB and the

contractor, vendor, or sub recipient.

- Monitoring will include a letter detailing the results of the monitoring.
 - Corrective actions will be required and implemented, if warranted.
 - Technical assistance will be provided and/or procured by a USWIB designee, if warranted.
 - Monitoring results may be subject to written appeal to the USWIB President, before becoming final.
- (l) A description of the Local Board's policy and procedures regarding the safeguarding and handling of personally identifiable and confidential information (ex., physical and electronic files), including the incident response plan for loss of records. *DWDAL's policy on privacy and data security can be found here: <http://www.labor.maryland.gov/employment/mpi/mpi4-19.pdf>.*

The USWIB and Chesapeake College have an agreement, entitled Upper Shore Workforce Investment Board Administrative Agreement that specifies the relationship between the USWIB and Chesapeake College. The USWIB, through this agreement, uses Chesapeake College policies, including the protection of Personally Identifiable Information (PII). The purpose of the Chesapeake College Identity Theft Protection Policy is quoted below:

"The protection of Confidential and Sensitive Information assets and the resources that support them are critical to the operation of Chesapeake College. As information assets are handled, they are placed at risk for potential threats of employee errors, malicious or criminal actions, theft, and fraud. Such events could cause Chesapeake College to incur a loss of confidentiality or privacy, financial damages, fines, and penalties. The purpose of this policy is to reduce the risk of a loss or breach of Confidential and Sensitive Information through guidelines designed to detect, prevent, and mitigate loss due to errors or malicious behavior. Chesapeake College recognizes that absolute security against all threats is an unrealistic expectation. Therefore, the goals of risk-reduction and implementation of this policy are based on:

- An assessment of the Confidential and Sensitive Information handled by Chesapeake College.
- The cost of preventative measures designed to detect and prevent errors or malicious behavior.
- The amount of risk that Chesapeake College is willing to absorb.

These policy guidelines were derived through a risk assessment of Chesapeake College methods of handling Confidential and Sensitive Information. Determination of appropriate security measures must be a part of all operations and shall undergo periodic evaluation."

Chesapeake College's Red Flag Policy includes the information below:

7.8.5. Response to Notice From Customers, Victims of Identity Theft, Law Enforcement Authorities, or Other Persons Regarding Possible Identity Theft in Connection with Covered Accounts

When notified of a security incident from customers, victims of identity theft, law enforcement authorities, or other persons regarding possible identity theft in connection with covered accounts must immediately inform senior management and the Identity Theft Prevention Officer. Appropriate responses are as follows:

- Decline account access.
- Close fraudulent account.
- Document with a Suspicious Activity Report (SAR).
- Notify existing customer on record.
- Open new account. Do Not Attempt to Collect on the Fraudulent Account from the True Identity.
- Cooperate with law enforcement.
- Other

When all available actions have been exhausted, escalate the response to the next higher job classification.

Because of the unique nature of the USWIB and the Workforce Innovation and Opportunity Act services provided by the USWIB, the USWIB will notify the following people/entities if a breach is detected or Personally Identifiable Information is lost.

- USWIB President
- Chesapeake College President
- The Maryland Department of Labor
- The United States Department of Labor
- The Governor's Workforce Development Board
- The USWIB Directors and Officers Insurance Carrier
- The person impacted by the breach or loss of data.

Training and Employment Guidance Letter (TEGL) 39-11 provides specific guidance related to the protection of Personally Identifiable Information (PII) for WIOA grants. The purpose of TEGL 39-11 is quoted below:

"To provide guidance to grantees on compliance with the requirements of handling and protecting PII in their grants."

The USWIB will review the compliance with the Chesapeake College PII policy and TEGL 39-

11 on an annual basis.

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

The USWIB, through the USWIB/Chesapeake College Agreement, uses the College’s procurement policies.

The College purchasing dollar thresholds are:

Under \$ 5, 000

One quote verbal or written.

Over \$ 5,000 – Under \$ 25,0000

Three written quotes

Over \$ 25,000

Competitive sealed bids/proposals

Purchasing Procedures
Chesapeake College

General policy

Chesapeake College purchases will be conducted via cost center-initiated requisitions to the Purchasing Department. The Purchasing Department is charged with conducting the purchasing function to obtain the greatest benefit for the college and in accordance with ethical practices as prescribed by the purchasing profession and consistent with governmental procurement policies as they apply to community colleges in the State of Maryland.

The USWIB will follow the Chesapeake College procurement procedure throughout the duration of this plan. If the Chesapeake College procurement procedure changes during the plan timeframe, the USWIB will follow the revised Chesapeake College procurement procedure.

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

The USWIB, through the Upper Shore Workforce Investment Board Administrative Agreement, uses the Chesapeake College Fixed Asset Inventory Procedures. The purpose of maintaining a fixed asset inventory for Chesapeake College is to maintain up-to-date, accurate inventory of all equipment purchased by the College. Fixed assets include units of furniture, furnishings, equipment, instruments, machines, or other articles that meet

the following criteria:

- A. The cost of the fixed asset is at least \$2,000.
- B. The useful life of the fixed asset is 3 years or longer.

The fixed asset inventory is available on the Chesapeake College Intranet and may be accessed at any time by key Title I funded staff.

Any disposition of property purchased under grants must be handled in accordance with applicable grant regulations. Prior to the disposal of the property, the Grants Office should be notified via the Property Transfer/Disposal Request form to determine that all necessary approvals have been obtained for the disposal of the property.

Property may only be disposed of with approval from the Grants office. The Grants Office should forward the approved request to the Senior Accountant to record the disposal in the Fixed Asset.

approvals have been obtained for the disposal of the property.

Proceeds from any sale of property will be credited to the appropriate grant revenue account.

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

The USWIB will evaluate a conflict of interest in accordance with WIOA Section 107 Local Workforce Development Boards (h) Conflict of Interest and the information below.

The USWIB Conflict of Interest Policy is sent to each USWIB member prior to every USWIB meeting and included below. The agenda for every USWIB meeting includes the statement, "Board Members will adhere with provisions of the Upper Shore Workforce Investment Board Conflict of Interest Policy when conducting the business outlined in this agenda".

Conflict of Interest Policy: Upper Shore Workforce Investment Board

- 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. 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. (State Ethics Commission #3 and #4)
- 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. Non-participation should include disclosure of

the conflict and abstention from discussing and voting on the matter. (State Ethics Commission #1 and #2)

- A member's employer may not participate in any way in a future bid on procurement where the member helped to draft specifications. To avoid potential conflicts as circumstance change, members whose employers may wish to participate in a future procurement will refrain from involvement in specification development. (State Ethics Commission # 12)
- 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. (State Ethics Commission # 6)
- Except in the discharge of an official duty, no board member may disclose or use confidential information acquired because of the board member's public position and not available to the public for personal economic benefit or for the economic benefit of another. (State Ethics Commission# 11)
- 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 chair 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, less than or equal to
- \$20 are permissible. (State Ethics Commission # 10) 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.

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, sister, or other member of the household.

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

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

The USWIB, through the Upper Shore Workforce Investment Board Administrative Agreement, utilizes the accounting procedures, accounts payable procedures, and accounts receivable procedure and reconciliation procedure of Chesapeake College. The Chesapeake College accounting procedures are based on Generally Accepted Accounting Procedures (GAAP) and are audited and monitored by an independent audit firm and grant and contract fiscal monitors.

The Chesapeake College accounting system can track budgets, obligations, expenditures, stand in costs, leveraged funds, and provide financial reports to local, state, and federal funding entities.

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

The USWIB creates, reviews, and approves the WIOA Title I budget each year. Key staff working with WIOA Title I funds include the USWIB Executive Director, the USWIB Assistant Director, the Chesapeake College Director of Financial Services, the Chesapeake College Director of Budget and procurement, the Chesapeake College Accounting Manager, the Chesapeake College Staff Accountant, and the Chesapeake College Grants Accounting Specialist.

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

The USWIB, through the Upper Shore Workforce Investment Board Administrative Agreement, uses the Chesapeake College fiscal system to manage and expend WIOA Title I funds. The Chesapeake College fiscal system is accessible through the College intranet.

1. The USWIB creates reviews and approves the Title I budget.
2. The Title I budget is added to the Chesapeake College fiscal system.
3. Each funding stream has a unique Fund Identifier, Example: In School Youth is 484.

4. Each Fund has applicable Function Identifiers, Example: 1800 is WIOA Program- General.
5. Each Fund has a Cost Center, Example: 50 is Executive Director WIOA Current Year.
6. Each Fund has Object Codes, Example: 6403 is Needs Based Payments.
7. An In School Youth who received a Needs Based Payment would manifest as an expenditure charged to 484-1800-50-6403

Requisitions are created using the intranet-based fiscal system. An invoice or other source document that is the basis for an expenditure is used to create a requisition. Requisitions have multiple levels of approvals and no funds are spent without all approvals in place. Requisitions are the basis for the creation of a Purchase Order. Purchase Orders allow goods and services to be received and are acknowledged online through the intranet-based fiscal system. When a Purchase Order is received in the fiscal system, the invoice or source document that is the basis for the expenditure is certified by the receiver with Purchase Order number, date received, Cost Center and receiver's initials. The certified invoice or source document is forwarded to the Chesapeake College Grants/Purchasing Department for final approvals and the release of funds.

Chesapeake College personnel reconcile checks and bank statements on a periodic basis to ensure that funds have been released and received by customers, vendors, contractors, consultants, sub- recipients, etc.

(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.

The USWIB, through the Upper Shore Workforce Investment Board Administrative Agreement, uses Chesapeake College's financial systems, policies, and Financial Services staff to spend, track and report WIOA Title I fund.

- Fiscal Reporting System: The Chesapeake College Colleague system is the intranet-based financial system that budgets, tracks, and reports expenditures of Title I funds.
- Obligation Control System: Obligations are created and tracked via budget, requisition, and purchase order. These actions are reflected in the intranet-based Colleague system.
- ITA payment system: Individual Training Accounts are tracked by Title I staff

using an excel spreadsheet and are tracked on the Colleague system. ITAs used at Chesapeake College are reflected by journal entries in the Colleague system. ITAs used at other training vendors are reflected by a requisition and purchase order in the Colleague system.

- Chart of Accounts System: The USWIB and Title I have unique Fund, Function and Cost Center, and object code in the Colleague system.
- Accounts Payable System: Title I expenditures take place using Chesapeake College.
- Accounts Payable procedures. The procedures include multiple approvals for expenditures and the ability to spend beyond the budget.
- Staff Payroll System: Staff payroll is fully integrated into the Chesapeake College system. The integration includes using all Chesapeake College payroll mechanisms: timesheets, leave reports, benefits, tax withholding.
- Participant Payroll System: If a participant is placed in an Earn and Learn activity, payment will be through a procured staffing company. The staffing company is the employer of record.
- Participant Stipend Payment System: Needs-Based Payments to participants are processed by Chesapeake College Financial Services staff, and payment is through a payroll-processing vendor.

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

The USWIB, through the Upper Shore Workforce Investment Board Administrative Agreement, uses the Chesapeake College cash management procedure. Chesapeake College implements a cost reimbursement/cash management system for Title I expenditures. The College "draws down" WIOA Title I funds from the Maryland Department of Labor quarterly based upon documented expenditures.

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

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

The Office of Management and Budget Uniform Grant Guidance provides information about cost allocation.

§ 200.4 Allocation.

Allocation means the process of assigning a cost, or a group of costs, to one or

more cost objective(s), in reasonable proportion to the benefit provided or other equitable relationship.

The process may entail assigning a cost(s) directly to a final cost objective or through one or more intermediate cost objectives.

The USWIB, through the Upper Shore Workforce Investment Board Administrative Agreement, works with Chesapeake College to direct charge costs. In the case where the benefit of a cost is not easily identifiable, the cost may be included in a cost pool. Cost Pools are distributed by Generally Accepted Accounting Principles (GAAP) and the basis may include staff time, expenditures, participants, or other GAAP methodologies.

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

If a debt is established, as the result of an audit, monitoring or any other circumstance, cash repayment is the primary sanction for the expenditure of Title I funds. Debt collection procedures begin with the forwarding of a written payment demand letter that includes the amount of the debt and the date the payment is due to Chesapeake College. Generally, the demand letter will ask for repayment in a lump sum, but a schedule of installment payments may be established if deemed appropriate.

If Chesapeake College's Financial Services staff, after adequate negotiation, determines that cash repayment is not possible, other methods to satisfy the debt may be explored. The USWIB may accept allowable WIOA services in lieu of cash as a satisfactory alternative. Such services must be in addition to those provided under any existing agreements and fairly valued. Finally, another method for settling debts is the reduction of payments to current sub recipients, vendor, or contractors while they continue to provide Title I services at existing levels. If debts cannot be satisfied through the methods described above, Chesapeake College's Financial Services staff will begin the process utilized by the College to collect debts.