

# Carroll County Local Workforce Area Plan





Carroll County Workforce Development Board

2020 - 2024





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# WIOA Plan Acronym Glossary

Acronym	Definition
ABAWD	Able-Bodied Adults Without Dependents
ABE	Adult Basic Education
ACLS	Advanced Cardiac Life Support Certification
ADA	American Disabilities Act
ALICE	Asset Limited, Income Constrained, Employed
AJC	American Job Center
BERC	Business/ Employment Resource Center
BLS	Basic Life Support (BLS) Certification
BMC	Baltimore Metropolitan Council
BRAC	Base Realignment and Closure
CAP	Cost Allocation Plan
CASAS	Comprehensive Adult Student Assessment Systems
CCC	Carroll Community College
CCNA	Cisco Certified Network Associate
CDL	Commercial Driver's License
CFR	Code of Federal Regulations
CISSP	Certified Information Systems Security Professional
CNA	Certified Nursing Assistant (CNA)
CRC	Civil Rights Center
CTE	Career and Technology Education
CTC	Career and Technology Centers
DHS	Department of Human Services
DISA	Defense Information Systems Agency
DWDAL	Division of Workforce Development and Adult Learning
DOL	Department of Labor
DORS	Division of Rehabilitation Services
DSS	Department of Social Services
DVOP	Disabled Veterans Outreach Program
EARN	Employment Advancement Right Now
EDA	Economic Development Authority
EO	Equal Opportunity
ESL	English as a Second Language
ELL	English Language Learner
ETPL	Eligible Training Provider List
FERPA	Federal Education Rights and Privacy Act
FMS	Financial Management System

GAAP	Generally Accepted Accounting Principles
GED	General Educational Diploma
GIAC	Global Information Assurance Certification
HSP	Human Services Program Inc.
ISS	Individual Services Strategy
ITA	Individual Training Account
ITIL	Information Technology Infrastructure Library Certification
LAUS	Local Area Unemployment Statistics
LDSS	Local Department of Social Services
LMI	Labor Market Information
LVER	Local Veterans Employment Representative
LWIOA	Local Workforce Innovation and Opportunity Act
MEP	Manufacturing Extension Partnership
MOSH	Maryland Occupational Safety and Health
MSFW	Migrant Seasonal Farmworker Program
MWE	Maryland Workforce Exchange
MWIN	Maryland Workforce Investment Network
NAMI	National Alliance on Mental Illness
NEDP	National External Diploma Program
NEG	National Emergency Grant
NESAP	North East Social Action Program
NSA	National Security Agency
OJT	On the Job Training
OMB	Office of Management and Budget
ONET	Occupation Information Network
OSO	One Stop Operator
PII	Personally Identifiable Information
POS	Point of Service
RESEA	Re-Employment Services Assessment
RFP	Request for Proposal
ROW	Reemployment Opportunities Workshop
SBDC	Small Business Development Center
SCORE	Service Core of Retired Executives
SCSEP	Senior Community Service Employment Program
SNAP	Supplemental Nutritional Assistance Program
STEM	Science, Technology, Engineering and Math
TAA	Trade Adjustment Assistance
TANF	Temporary Assistance for Needy Families
TCA	Temporary Cash Assistance

TEGL	Training and Employment Guidance Letters
UCX	Unemployment Compensation for Ex-Military members
UI	Unemployment Insurance
US	United States
USDOL	United States Department of Labor
WARN	Worker Adjustment and Retraining Notification
WDA	Workforce Development Area
WDB	Workforce Development Board
WIA	Workforce Investment Act
WIB	Workforce Investment Board
WIOA	Workforce Innovation and Opportunity Act
WP	Wagner-Peyser
WPR	Work Participation Rate

#### Introduction

Historically, the Mid-Maryland Workforce Development Area is comprised of Carroll and Howard Counties. In July 2019 a discussion to dissolve the partnership and create separate workforce areas began with Maryland DOL, Carroll County and Howard County. While the longstanding Mid-Maryland partnership has been a successful entity, this move serves only to strengthen services to the constituents and businesses of the respective counties. With all parties being in agreement of the move, work began to create a smooth transition to two distinct workforce areas beginning July 1,2021. The Mid-Maryland Workforce Board will oversee the transition of the workforce areas by serving both workforce areas in the establishment of new Local Boards and oversight and approval of the 2020-2024 Local Plans. During the transition to separate areas, the board authorizes each County to use Mid-Maryland policies, board mission/vison and other applicable components of the Mid-Maryland Workforce Development Board/Area until such time as each area adopts its own iterations of these concepts/documents.

The Carroll Workforce Development Board will collaborate with a wide variety of individuals, businesses, and organizations. The Workforce Development Board views its mission as guiding a locally recognized workforce development system that aligns with the economic and educational goals of the state of Maryland resulting in a qualified workforce available to Carroll County businesses; this mission directly supports economic business growth.

The Carroll Workforce Development Board's vision is for a county where every person maximizes his or her career potential and businesses have access to the human-capital they need to be successful.

The local plan is a living document and changes as workforce needs are identified. It is important to the Carroll Workforce Development Board that we respond to the needs of business and maintain and enhance the quality of life in the County.

#### **Section 1 – Economic Analysis**

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

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

#### **Economic Overview**

Carroll County's central location in the state attracts a diversity of business interests. Set in a rural landscape, Carroll County has 8 small municipalities and an aggregate a population of 168,000. We have two institutions of higher learning and a high performing public school system. The region has a civilian labor force of 91,196 with a participation rate of 67.5%. The business composition in the county includes a significant number of firms in manufacturing, transportation, and health and business service sectors. Agriculture remains a viable industry with an emphasis on nurturing bioscience and other emerging enterprises.

As part of the Baltimore metropolitan area, Carroll County enjoys strategic assets such as proximity to major transportation hubs including the Port of Baltimore and Baltimore/Washington International Thurgood Marshall Airport. The Carroll County Regional Airport, a full-service airport boasting corporate hangers and a 5,100-foot runway, supports corporate and smaller commercial aircraft operations. The county's private sector industries generate \$4.7 billion in economic output. Major manufacturing and distribution firms in the county include Northrop Grumman, Penguin Random House, Flowserve, VAPCO and Flowserve. Relocations and expansions to the county include Strouse Corporation, Find Solid Doors, G3 Technologies, Knorr Brake and Fairlawn Tool.

Prior to the COVID-19 pandemic and the State of Emergency beginning in March 2020, Carroll County (Mid-Maryland Workforce Area) had the lowest unemployment rates in the state at 2.8% peaking in April at 7.9%. To date, we continue to have the lowest unemployment rate in the state (Table X). The COVID-19 pandemic saw unemployment numbers in the county reaching 4,039 countians in September 2020. Occupational losses were highest in food and service-related occupations, personal care, sales and office administration. The hardest hit industries have been accommodation and food services; healthcare and social assistance; retail and trade as well as administrative services. Rebound Carroll grants to small businesses provided relief focusing on these industries. As the state of emergency continues, Carroll has seen several local businesses rapidly pivot to the manufacturing and distribution PPE that has become critical to our county. Despite the economic crisis, Carroll has many resilient businesses.

As the nation has come to realize the expanded definition of frontline workers. The Business/Employment Resource Center (BERC) has continued to work with jobseekers and businesses to fill vacancies of these vital positions in retail, food service, healthcare, and manufacturing. (Tables I and II)

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

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

# Table I

# **Maryland Job Area Distribution**

The table below shows the counties in Maryland with the highest number of job openings and green jobs advertised online on January 31, 2021 (Jobs De-duplication Level 2).

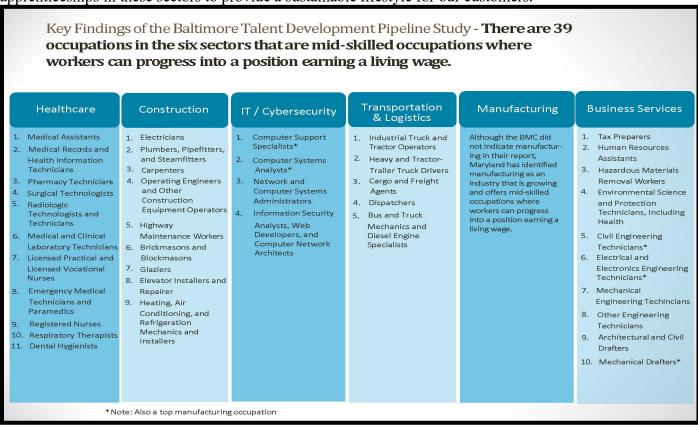
Rank	Area Name	Job Openings
1	Baltimore, City of, MD	21,145
2	Montgomery County, MD	21,034
3	Anne Arundel County, MD	15,851
4	Baltimore County, MD	14,550
5	Howard County, MD	12,907
6	Prince George's County, MD	11,915
7	Harford County, MD	5,485
8	Frederick County, MD	5,464
9	St. Mary's County, MD	3,137
10	Washington County, MD	3,027
11	Carroll County, MD	2,139
12	Charles County, MD	2,065
13	Wicomico County, MD	1,795
14	Cecil County, MD	1,649
15	Allegany County, MD	1,284
16	Talbot County, MD	1,216
17	Worcester County, MD	910
18	Calvert County, MD	803
19	Queen Anne's County, MD	749
20	Dorchester County, MD	539
21	Caroline County, MD	462
22	Kent County, MD	364
23	Somerset County, MD	330
24	Garrett County, MD	231

#### Table II

1 able 11				
Emerging and Growth Industries for Carroll County				
Emerging Growth In-Demand				
Healthcare Support Occupations	Healthcare and Social Assistance	Healthcare and Social Assistance		
Food Services	Accommodation and Food Services	Retail Trade		
Sales and Related Services	Construction	Construction		
	Professional, Scientific and Technical Services	Educational Services		
		Accommodation and Food Services		
		Manufacturing		

#### Table III

The Baltimore Talent Pipeline Study shows continued alignment with Carroll's Emerging and Growth Industries. The Local Board's goals are consistent with providing career training, stackable credentials and apprenticeships in these sectors to provide a sustainable lifestyle for our customers.



NOTE: In providing an analysis as outlined in this Section, Local Boards may utilize an existing analysis previously commissioned by the Local Board as long as it addresses the provisions of this Section. Local Boards are encouraged to use the Growth Industry Tool (available on MD Labor's website at: <a href="https://www.labor.maryland.gov/lmi/wiagrowthind/git.shtml">https://www.labor.maryland.gov/lmi/wiagrowthind/git.shtml</a>) and the Growth Occupation Tool (available at: <a href="https://www.labor.maryland.gov/lmi/wiagrowthind/got.shtml">https://www.labor.maryland.gov/lmi/wiagrowthind/got.shtml</a>) as an aid to examining employment, growth, and employment concentration for the Local Area.999

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

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

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

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

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

An analysis of the workforce in the Local Area, including current labor force employment (and unemployment) data,<sup>3</sup> and information on labor market trends, and the educational and skill levels of the workforce in the Local Area,<sup>4</sup> including individuals with barriers to employment.

Carroll County's employer base is over 4,400 with over 90,404 in the labor force and an approximate median income of \$95,825. Over half of workforce commutes outside of the County. Significant numbers of commuters from across the state of Maryland as well as out-of-state workers come into Carroll County for employment. Education is highly valued in the Area. The 2018 Maryland Report Card indicates that a high school graduation rate of approximately 95%. In addition, the report indicates that over 74% Carroll's graduates are pursuing post-secondary studies.

Carroll County has the lowest unemployment rate in the State of Maryland. (Table X) In this area, our businesses face challenges finding the highly qualified employees they need to fill their open positions. In addition, with a very low unemployment rate it is equally difficult to fill low skilled jobs. The healthcare, service and manufacturing sector continue to have the highest number of vacancies. The pandemic has defined essential workers not only in healthcare but retail, food service, manufacturing, and transportation occupations.

Employment in these occupations requires jobseekers to possess essential skills including effective communication, critical thinking and problem solving, adaptability, customer service and computer skills. See Table

<sup>3</sup> There are a variety of ways to determine the knowledge and skills needed to meet the employment needs (e.g., employer surveys, real-time LMI). Real-time LMI (e.g., Certifications Advertised, Advertised Education Level) is available at: https://mwejobs.maryland.gov/vosnet/Default.aspx.

<sup>4</sup> Employment and unemployment data is available at: <a href="https://www.labor.maryland.gov/lmi/laus/lauscounties.shtml">https://www.labor.maryland.gov/lmi/laus/lauscounties.shtml</a> and <a href="https://www.labor.maryland.gov/lmi/laus/lauscounties.shtml">https://www.labor.maryland.gov/lmi/laus/lauscounties.shtml</a> and <a href="https://labor.maryland.gov/lmi/lauscounties.shtml">https://labor.maryland.gov/lmi/lauscounties.shtml</a> and <a href="https://www.labor.maryland.gov/lmi/lauscounties.shtml">https://www.labor.maryland.gov/lmi/lauscounties.shtml</a> and <a href="https://www.labor.maryland.gov/lmi/lauscounties.shtml">https://www.labor.maryland.g

<sup>5</sup> There are a variety of ways to determine educational and skill levels of the workforce. Real-time LMI is available at: <a href="https://mwejobs.maryland.gov/vosnet/Default.aspx">https://mwejobs.maryland.gov/vosnet/Default.aspx</a>. Worker educational attainment by area is available at: <a href="http://onthemap.ces.census.gov/">http://onthemap.ces.census.gov/</a>.

Carroll recognizes the importance of increasing employment and work opportunities for people with disabilities and works closely with its partners at DORS to help individuals find meaningful employment. According to the 2014-2015 American Community Survey 5-Year Estimates, approximately 5-7% of Mid-Maryland's population are working age individuals with disabilities. The Division of Rehabilitation Services reports serving approximately 752 Carroll County residents, of which the majority reported having cognitive, mental, psychosocial and physical impairments. 76% of these individuals had a high school diploma, including special education and 23% with some post-secondary education.

The Carroll AJC Workforce Centers provide comprehensive employment services to assist ex-offenders and those that who are close to release Through representation on the Re-entry Coordinating Council bi-monthly meetings, we are actively involved in strategizing ways to assist ex-offenders who are on the road to self-sufficiency. We work closely with the Carroll County Detention Center and the Drug Court Program; we have a dedicated staff member who provides pre-release outreach to educate inmates on labor market information and other resources offered at the American Job Centers.

In Carroll, limited public transportation has contributed to the challenges some employer's face in finding and retaining employees. With the several small rural towns, the County continues to look for ways to improve upon the transportation infrastructure needed to help businesses meet their workforce needs and to assist jobseekers with maintaining employment. Although we attempt to find innovative solutions to the transportation challenges, many entry-level workers, who do not own a vehicle, have difficulty getting to and from work using public transportation.

The charts on the following four pages reflect the demographics served in Mid-Maryland based on data obtained through the Maryland Workforce Exchange System.

#### **Table IV**

# Carroll County, MD Advertised Job Skills

The table below shows the top 10 advertised detailed job skills found in job openings, advertised online, in Carroll County, MD in December 2020 (Jobs De-duplication Level 1).

Over half of the top 10 advertised job skills in Carroll County that are listed in the Maryland Workforce Exchange identify a need for "soft/essential skills." Other top skills needed are in the Healthcare and Business Services industries. (Results are based on information entered by each organization.)

Rank	Advertised Detailed Job Skill	Advertised Skill Group	Job Opening Match Count
1	Customer service	Customer Service Skills	271
2	Evaluates patient response	Paramedic Skills	120
3	Monitors patient progress	Occupational Therapist Skills	114
4	Organizational skills	Basic Skills	72
5	Problem solving	Basic Skills	61
6	Attention to detail	Basic Skills	58
7	Must be flexible	Basic Skills	54
8	Interpersonal skills	Interpersonal Skills	44
9	Time management	Basic Skills	43
10	Crisis intervention	Mental Health Counselor Skills	43

#### Table V

# Carroll County, MD Advertised Tools and Technology

The table below shows the top 10 advertised detailed tools and technologies found in job openings, advertised online, in Carroll County, MD in December 2020 (Jobs De-duplication Level 1).

Listed are the most often requested tools and technology needs listed in the Maryland Workforce Exchange for Carroll County job postings.

Rank	Advertised Tool or Technology	Advertised Tool and Technology Group	Job Opening Match Count
1	Teletypewriters (TTY)	Teletype Input Devices	93
2	Cash Register	Cash Registers	46
3	Passenger Car	Automobiles or Cars	42
4	Microsoft (MS) Office	Office Suite Software	32
5	Ladders	Ladders	25
6	Motor vehicles	Automobiles or Cars	17
7	Forklift	Forklifts	16
8	Saws	Saws	15
9	Microsoft Excel	Spreadsheet Software	14
10	Keyboard	Keyboards	13

# Table VI

# Area Profile for Carroll County, MD Advertised Job Certifications

The table below shows the top 10 advertised job certifications found in job openings, advertised online, in Carroll County, MD in December 2020. (Jobs De-duplication Level 1).

The most sought-after certifications are in the Healthcare and Transportation industries.

Rank	Advertised Certification Group	Advertised Certification Sub- Category	Job Opening Match Count
1	American Heart Association (AHA) CPR & First Aid Certifications	Nursing	393
2	Nursing Credentials and Certifications	Nursing	295
3	Commercial Driver's License (CDL)	Ground Transportation	16
4	Oncology Nursing Certification Corporation (ONCC)	Nursing	15
5	Hospice and Palliative Nurses Association (HPNA) Certifications	Nursing	15
6	Social Worker Credentials & Certifications	Social and Human Services	14
7	American Medical Technologists (AMT) Certifications	Medical Professional	8
8	Association for the Advancement of Medical Instrumentation (AAMI) Certifications	Healthcare - All Other	8
9	ServSuccess Certifications	Food Service Management	7
10	National Commission on Certification of Physician Assistants (NCCPA) Certifications	Medical Professional	6

# **Table** VII

# Carroll County, MD Education Requirements on Advertised Jobs

The table below shows the minimum level of education requested by employers on job openings, advertised online, in Carroll County, MD on January 31, 2021. (Jobs De-duplication Level 2).

The "Not Specified" high percentage may be due to error in conversion of existing job orders and entry of job orders by employers. It is important that targeted individuals with significant barriers, receive advanced training to be qualified and competitive for these jobs.

Rank	<b>Education Level</b>	Job Openings	Percentage of Job Openings
1	No Minimum Education Requirement	140	6.55%
2	Less than High School	0	N/A
3	High School Diploma or Equivalent	108	5.05%
4	Vocational School Certificate	1	0.05%
5	Associate Degree	6	0.28%
6	Bachelor's Degree	34	1.59%
7	Master's Degree	3	0.14%
8	Doctorate Degree	0	N/A
9	Specialized Degree (e.g. MD, DDS)	0	N/A
10	Not Specified	1,847	86.35%

Source: Job Source: Online advertised jobs data, MWE

#### **Table VIII**

# **Carroll County, MD Work Experience Requirements on Advertised Jobs**

The table below shows the minimum required work experience on job openings advertised online in Carroll County, MD on January 31, 2021 (Jobs De-duplication Level 2).

94% of advertised job openings in Carroll County require 1 year or more work experience. This presents a challenge to newly trained job seekers; therefore, Carroll County will promote use of On-the-Job training, transitional jobs and internships and other work and learn opportunities.

Rank	Experience	Job Openings	Percentage of Job Openings
1	Entry Level	116	5.42%
2	Less than 1 year	9	0.42%
3	1 Year to 2 Years	1,988	92.94%
4	2 Years to 5 Years	20	0.94%
5	5 Years to 10 Years	5	0.23%
6	More than 10 Years	1	0.05%

# **Table IX**

# **Carroll County, MD Employers by Number of Job Openings**

The table below shows the employers with the highest number of job openings advertised online in Carroll County, MD on January 31, 2021 (Jobs De-duplication Level 2).

Carroll County's emerging and growth industries are reflected in Table IX; healthcare currently offers the most job openings.

Rank	Employer Name	Job Openings
1	LifeBridge Health	355
2	Penguin Random House LLC	19
3	84 LUMBER	12
4	Goodwill Industries of Monocacy Valley	9
5	Panera, LLC	9
6	BAYADA Home Health Care, Inc.	8
7	Ferrellgas	6
8	Knorr Brake Corporation	6
9	Davita	4
10	NORTHEAST FOODS	4

(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.

Carroll WDA has the capacity to provide a range of workforce development activities. Our workforce development system strives to align workforce activities with business needs. Carroll County has one of the top performing K-14 systems in the state. Our K-12 education system has a very high graduation rate. The Career and Technology Center (CTC) provides education and training that reflects the local market demand and prepares students for advanced education/employment. Students may earn college credit and job-driven industry certifications through the CTC. WIOA Title I staff serve on the advisory boards for the CTCs. The community college, particularly the Continuing Education division, creates programs that effectively respond to the skills required by area business. Registered apprenticeship opportunities are available through the area community colleges in some of the skilled trades.

There are numerous quality-training providers and programs in Maryland. However, we are limited by the number of programs in our area on the Eligible Training Providers List (ETPL). Fortunately, our geographic location allows for participants to access training outside of Mid-Maryland.

Our Business Services Team assists businesses with overcoming the challenges of recruiting, retaining, and developing talent. The Business Services Team has a clear understanding of industry skill needs, identifying appropriate strategies for assisting employers, and coordinating business services activities across partner programs. The Team presents a unified voice for its communications with business.

#### **Strengths:**

- Co-location with WIOA-mandated core partners and strong collaboration with other partners
- Effective working relationships with local and other partners throughout the state of Maryland
- Workshop facilitators are subject matter experts
- Educated and credentialed workforce development staff committed to the mission
- Staff is knowledgeable of current labor market trends and projections, and skills required in the labor market; staff has extensive knowledge of community resources
- An Integrated and robust business services team
- Strong customer service focus; high quality and specialized career services

#### Weaknesses:

- Need to further increase outreach and recruitment efforts to businesses, and job seekers including targeted populations under WIOA and improve marketing of services available
- Need to establish a statewide common intake process with partners that are more customer-friendly and streamlined to alleviate "agency time" for clients
- Limited public transportation options
- Limitations of ETPL

**TABLE X** 

# Maryland Labor Force, Employment and Unemployment Distribution

The table below shows the counties with the highest preliminary unemployment rate in Maryland for June 2021. These figures are not seasonally adjusted.

Carroll County has the lowest unemployment rate in the State of Maryland. In this area, our businesses face challenges finding the highly qualified employees they need to fill their open positions. In addition, with a very low unemployment rate it is equally difficult to fill low skilled jobs.

Rank	Area	Number Employed	Number Unemployed	Unemployment Rate	
	Maryland	2,951,491	210,325	6.7%	
1	Somerset County, MD	8,437	798	8.6%	
2	Baltimore, City of, MD	257,791	23,669	8.4%	
3	Prince George's County, MD	451,896	41,132	8.3%	
4	Worcester County, MD	24,006	1,930	7.4%	
5	Allegany County, MD	28,721	2,297	7.4%	
6	Dorchester County, MD	13,940	1,024	6.8%	
7	Charles County, MD	78,356	5,658	6.7%	
8	Wicomico County, MD	49,492	3,489	6.6%	
9	Washington County, MD	66,604	4,699	6.6%	
10	Baltimore County, MD	417,322	29,176	6.5%	
11	Montgomery County, MD	512,339	35,185	6.4%	
12	Kent County, MD	8,826	583	6.2%	
13	Garrett County, MD	13,928	916	6.2%	
14	Cecil County, MD	48,967	3,162	6.1%	
15	Frederick County, MD	123,983	7,694	5.8%	
16	Talbot County, MD	169,985	1,038	5.8%	
17	Harford County, MD	130,773	7,894	5.7%	
18	Anne Arundel County, MD	293,686	17,438	5.6%	
19	Caroline County, MD	16,219	968	5.6%	
20	Calvert County, MD	44,930	2,655	5.6%	
21	St. Mary's County, MD	54,587	3,060	5.3%	
22	Howard County, MD	175,842	9,693	5.2%	
23	Queen Anne's County, MD	25,537	1,410	5.2%	
24	Carroll County, MD	88,323	4,759	5.1%	
	Source: Local Area Unemployment Statistics (LAUS) Unit and Bureau of Labor Statistics				

#### **Table XI**

# Area Profile for Carroll County, MD Education Level of Candidates

The table below shows the educational attainment of candidates in the workforce system, in Carroll County, MD on January 31, 2021.

It is important that targeted individuals with significant barriers, receive advanced training to be qualified and competitive for these jobs.

Rank	<b>Education Level</b>	<b>Potential Candidates</b>	Percentage
1	No Minimum Education Requirement	0	N/A
2	Less than High School	267	2.11%
3	High School Diploma or Equivalent	3,058	24.16%
4	Vocational School Certificate	906	7.16%
5	Associates Degree	1,129	8.92%
6	Bachelor's Degree	3,627	28.66%
7	Master's Degree	1,595	12.60%
8	Doctorate Degree	273	2.16%
9	Specialized Degree (e.g. MD, DDS)	79	0.62%
10	Not Specified	0	N/A

Candidate Source: Individuals with active résumés in the workforce system, MWE

#### **Table XII**

# Area Profile for Carroll County, MD Work Experience of Candidates

The table below shows the experience levels of potential candidates in Carroll County, MD on January 31, 2021.

Available candidates offer a wealth of experience. Over 90% have 1 year or more of work experience with 94% of job openings requiring 1 year or more work experience (Table VIII). The challenge Carroll County faces is that the work experience of candidates is not always in the same industry as what is needed in advertised open positions.

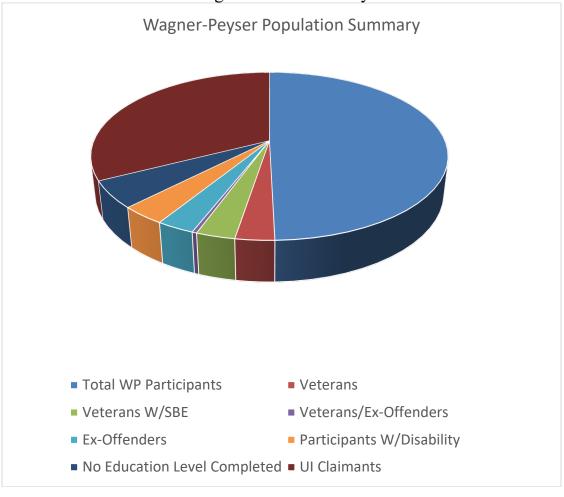
Rank	Minimum Experience	<b>Potential Candidates</b>	Percentage
1	Entry Level	0	N/A
2	Less than 1 year	1,227	9.66%
3	1 Year to 2 Years	503	3.96%
4	2 Years to 5 Years	1,492	11.75%
5	5 Years to 10 Years	2,095	16.50%
6	More than 10 Years	7,384	58.14%

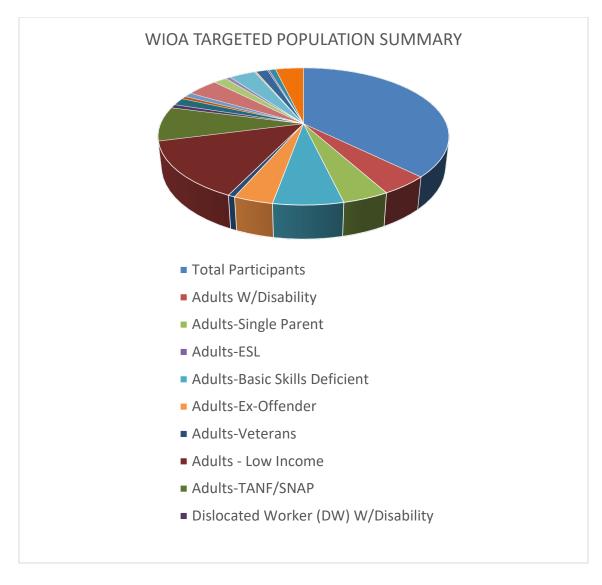
Candidate Source: Individuals with active résumés in the workforce system, MWE

# **Enrolled Individuals**

Participation Date: 7/1/20 - 2/5/21

Report Type: WIOA Region: Carroll County





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

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

(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 in order to support Local Area economic growth and economic self-sufficiency.

The Workforce Development Board views the mission of the board as guiding a regionally recognized workforce development system that aligns with the economic and educational goals of the state of Maryland resulting in a qualified workforce available to business across Carroll County; our mission directly supports economic business growth.

The vision is for a Carroll Workforce Area where every person maximizes his or her career potential and businesses have access to the human capital, they need to be successful.

Carroll's plan is in alignment with Maryland's Benchmarks of Success as a framework to guide services and activities that are responsive to the needs of the workforce and businesses. This will be accomplished by maximizing access to employment; use of skills and credentialing, life management skills and eliminating barriers to employment.

One goal is to strengthen strategic partnerships with business and education. We believe the most effective way to prepare the workforce is to respond to the current and future needs of regional businesses. We will continue to respond to business demand for both hard and soft skills. We consistently hear from businesses that many candidates while technically suited, lack the soft skills crucial to employee success. This is of particular concern with young people and those individuals with barriers. We will address these vital skills gaps through assessment, counseling, role modeling, and training. We will provide training opportunities to narrow the hard skills gap that have been identified. For example, defense industry sector jobs often require certifications. In response to this demand, we provide training leading to those credentials, certifications and ultimately employment. (Benchmarks 1, 2 and 3)

Another goal is to meet performance while putting people first. Each participant will be assessed to identify workforce strengths and weaknesses and how to prepare them to meet the labor market needs. An individual employment plan will be developed to assist them in successfully obtaining and retaining employment. Our goal is to start people on a career pathway leading to a self-sufficient wage. We plan to offer youth work and learn opportunities to provide access to hard and soft skills.

WIOA Performance Metrics	Agreed Upon Goals for PY2020	
Adult Measures		
Employment Rate 2nd Quarter after exit	76%	
Employment Rate 4th Quarter after exit	72%	
Median Earnings 2nd Quarter after exit	\$5,900	
Credential Attainment within 4 Quarters after exit	59%	
Measurable Skills Gains YTD	52%	

Dislocated Worker Measures		
Employment Rate 2nd Quarter after exit	80%	
Employment Rate 4th Quarter after exit	76%	
Median Earnings 2nd Quarter after exit	\$9,000	
Credential Attainment within 4 Quarters after exit	56%	
Measurable Skills Gains YTD	55%	
Youth Measures		
Education and Employment Rate 2nd Quarter after exit	69%	
Education and Employment Rate 4th Quarter after exit	65%	
Median Earnings 2 <sup>nd</sup> Quarter after Exit	\$3,410	
Credential Attainment within 4 Quarters after exit	63%	
Measurable Skills Gains YTD	48%	
Wagner-Peyser Measures		
Employment Rate 2nd Quarter after exit	59%	
Employment Rate 4th Quarter after exit	58%	
Median Earnings 2nd Quarter after exit	\$6,500	

Carroll will develop a strategic plan to increase outreach to targeted populations such as homeless individuals, disconnected youth, individuals with disabilities, ex-offenders and others receiving priority for WIOA Adult funds. We currently have relationships with many partner organizations servicing these individuals but would like to reach out to even more. We plan to accomplish this by expanding outreach to other service providers of these targeted populations. We want to capitalize on the opportunities the COVID-19 pandemic presented as services became virtual due to closure; a virtual AJC is a way to reach more customers particularly the underemployed population. We will provide veterans and their family members workforce support to make the transition from military to civilian employment as successful as possible. It is important to the WDA that its residents maintain or enhance their quality of life and achieve the American dream. Through our existing and expanding partnerships, together we will eliminate barriers to employment.

Carroll's goals will increase the economic growth and self-sufficiency to lead to a better prepared and responsive workforce using the Benchmarks of Success. Mid-Maryland has always subscribed to the goals identified in the Benchmarks of Success that are woven throughout the Local Plan. Although not clearly, labeled the concepts are integrated throughout.

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

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

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

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

Carroll will continue to build a strong partnership; to increase visibility in the community; to ensure alignment of the system and to make the best use of resources available. The over-reaching goal is an integrated system that is responsive to local and regional workforce needs. Collaboration will result in enhanced customer service. Focus should include building a core partnership that is transparent to the jobseekers, community agencies and the business sector; and that promotes an awareness of collaboration and streamlined services to the community.

This will be achieved by:

- Participate jointly in community events and scheduling joint outreach with local agencies and communities.
- Information sharing to ensure alignment with the goals identified by the board
- Supporting the state's goal for a common intake process at the local level
- Establishing and maintaining point of contacts for each partner to enhance the customer referral process and case collaboration to support customers with barriers to successful employment
- (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.).

Carroll enjoys a robust workforce development system with established partnerships. We work with numerous partners including those identified in the state plan. The system includes the following partners but is not limited to:

- Title I WIOA (WA, WD, Youth)
- DOL (Wagner Peyser, Veterans, Trade, U.I and Migrant and Seasonal Farm Workers)
- Division of Rehabilitation Services (DORS)
- Adult Education & Literacy
- Carl Perkins
- Carroll County DHS (TANF)
- Human Services Program, Inc. (CAA)
- SCSEP

Many of the programs are co-located. WIOA Title 1, Wagner Peyser, Adult Education and SCSEP are co-located in the comprehensive AJC full time with part-time DHS and DORS representation. HSP provides monthly workshops. Our veteran representative (DVOP) is onsite to meet with veterans, with significant barriers and is very active in veterans' committees and activities within Carroll County. Our

collocation with Adult Education allows us to provide basic skills assessments that are coordinated to avoid duplication.

All partners plan to communicate regularly to ensure services are provided seamlessly, collaboratively and without duplication. Carroll has implemented a common intake and/or referral process with core partners; we are working toward all partners utilizing the tool with consistency. Core partners are also meeting to address further alignment, integration and service strategies. Additionally, all partners identified in the state plan are either on the Workforce Development Board, attend partner meetings or participate on a committee. We share information about services and resources available for participants and businesses as well as outlining quarterly trainings and professional development strategies. These trainings allow staff to develop a deeper understanding services provided by our partners and how common services are threaded throughout which works toward a system of seamless transition and successful outcomes. Carroll will expand our partner meetings to conclude our local community partners, to ensure customers have access to all community resources not just those within the AJC. As we transition to a separate workforce area, the Local board and WIOA partners will hold an annual convening to define vision and goals incorporating the *Benchmarks of Success*.

BERC is an active member of the Carroll County Public Schools (CCPS) CTE Advisory Board. The programs of study are developed with input from the advisory boards that also align with the priority industries identified in our plan. Additionally, a member of the Carroll County Career and Technology Center (CCCTC) serves on the Local Board.

Programs of study will be developed based on the following: employer input, labor market information, priority industries, industries identified in the Baltimore Metropolitan Council's Talent Development Pipeline Study and the Greater Baltimore Council Committee's Workforce Development Initiative Report both of which offer data on career pathways leading to middle wage jobs. We will also use emerging, growth and priority industries identified by LMI and the WDB.

(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).

We will use varied strategies to expand access for eligible individuals particularly individuals with barriers to employment. At present, we outreach to a variety of community organizations and agencies, in addition to the core partners but not limited to: housing agencies, health department, and homeless services agencies, rehab settings, libraries and other community organizations. We intend to expand our outreach while using Maryland's strategy to "place people before performance". We will reach out to non-traditional locations, where individuals with barriers may be such as halfway houses, outpatient services programs, drug court and other local advicacy organizations. We have expanded our social media presence and digital platform. During the COVID-19 pandemic due to closures and limited-use of the AJC, we have created an online Jobs Board and provided a well-received virtual Jobs Club.

We are continuing work to fully utilize a common referral and intake process with our WIOA partners. Our goal is to have everyone know their "NEXT STEP" along their career path. The over-reaching idea is to have a clear and sequential understanding of "what is next for your career" in the industry. We will use the data from the Baltimore Metropolitan Council Opportunity Collaborative research to identify career pathways that align with the established need as well as the other LMI identified by the board. When funding training we work toward assisting the individual with obtaining a certification or credential that is portable, stackable and

in demand. We review labor market information and will only support training where data indicates it will lead to employment. When an individual is embarking on a new career, we support training that allows for upward mobility and expands their opportunities. We would like to increase registered apprenticeship opportunities to create career ladders leading to successful employment for our adult and youth customers.

We have a significant percentage of customers over the age 50 and we are mindful as an aging workforce they may need to make age-related career changes. This age group tends to Basic Skills Deficient in digital literacy. We will work with businesses and partners to develop a digital literacy path for customers that will open up employment opportunities while enhancing their personal management skills. This aligns with what we have seen as a resulting need with the onset of the COVID-19 pandemic. Many customers lacked the skills to apply online for UI benefits and to manage and track benefits.

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

The Mid-Maryland Board met to review the Vision and Mission of our area. The Local plan was developed utilizing board recommendations for both counties. The Executive Committee of the Mid-Maryland board has met monthly to develop clear focus for the two counties. As we move forward to the Carroll Workforce area, we will continue with the evolution of the plan and the more specific needs of the local area. Carroll continues to work in a strong and collaborative partnership.

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

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

The following strategies and services are options that may be used:

- Work with Economic Development to form ad-hoc committees from in-demand industry sectors to gather their input and needs for follow-up action
- Increase social media outreach (i.e. LinkedIn groups)
- Invite industry representatives to speak with job seekers
- Monitor WARN notices
- Increase outreach through business and industry trade associations, real estate brokers (leasing space to incoming or expanding businesses)
- Increase speaking engagements in the business community
- Establish an outreach subcommittee to continuously seek ways to engage target businesses
- Continue to participate in Economic Development Meetings to support businesses seeking employees and people seeking employment opportunities
- Establish a regular interval and method for communication of updates
  - Two-way communication between business and the partners opens opportunities that will assist in meeting business needs early in the process. Proactive communication affords the opportunity for active engagement of businesses
- Participate in joint visits to businesses in the community
  - Routinely visiting organizations in the community helps to establish consistent relationships that place our resources at the forefront of their thoughts. Performing regular outreach helps ensure

the relationship outlasts turnover, turbulent, or challenging times. The outreach creates a partnership between the partners and the benefiting business

• Participate in Business Appreciation Week

This approach helps reinforce the WDB/business relationship and continues to educate businesses on opportunities available to them

• Strengthen linkage between UI and AJC

Locally, AJC staff assists with helping job seekers file UI claims and setting up appeal requests. We plan to request staff training from U.I. for the AJC. In Mid-Maryland, there is a specific point of contact from the UI system to help with RESEA and ROW as well as more complex UI issues. Having a direct point of contact will strengthen the linkage between programs. We implemented RESEA and ROW locally, which has direct ties to UI.

Communicating strategies and services

We will share information among the partners relevant to each other's programs. For example, if we discover a business's employees are in need of adult education services, we will inform our Adult Education partners.

(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.

Information will be solicited and shared using several methods, including satisfaction surveys, formal and informal direct customer feedback which may be obtained individually or in groups. We will solicit and receive feedback from a diverse cross-representation of our population. This feedback will be used to address the needs of the Local Area.

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

- EARN Maryland,
- Pre-apprenticeship and Registered Apprenticeship,
- Incumbent worker training programs,
- On-the-job training programs,
- Customized training programs,
- Industry and sector strategies,
- Integrated education and training,
- Career pathways initiatives,
- Utilization of effective business intermediaries, and
- Other business services and strategies.

Carroll has successfully used the OJT program for many years. We have used our local incumbent worker training program in our workforce area, and plan to continue to use both programs. We will use existing industry-organizations to glean information and participation in sector partnerships. For example, through information gathered from the Manufacturing Consortium, Carroll Community College is seeking funding to develop a manufacturing foundations training and a digital fabrication lab to address the skills gap identified by this group and identify potential career pathways. We support and work with the Carroll CC in creating training programs consistent with career pathways and registered apprenticeship initiatives. We will expose our participants to more registered apprenticeship opportunities to assist with filling the demand in the Area. We plan to expand industry-sector partnerships, increase outreach to businesses, and business organizations in support of these initiatives. The Carroll Manufacturing Consortium sponsors an annual manufacturing fair at Carroll CC. Carroll Business Consultant was worked closely with the Regional Business Services Team to promote, recruit and participate in the virtual recruitments that have launched as

a result of agency closures during the COVID-19 pandemic.

(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.

BERC is an agency of the Carroll County Economic Development Department (CCED) which is seen as an comprehensive partnership in the delivery of services to the local economy. CCED Deputy Director serves a member of the LWDB. The local board promote entrepreneurial skills and microenterprise services using various means to include:

- (A) Support Client Self-Employment workforce services with the programs of the Maryland Small Business Development Center (SBDC), the area Service Core of Retired Executives (SCORE), and the Miller Business Center at Carroll Community College.
- (B) Provide a regular schedule of self-employment resources in the community.

  Maintain an up-to-date listing of the counseling, training, and mentoring resources and how to register for such services available to support WDB clients seeking to start their own businesses.
- (C) Include the SBDC at self-employment workshops at the AJC include entrepreneurship as a component of reemployment workshops at the AJC to broaden the range of options for clients.
- (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.

We are very well connected to our community partners who provide support services. We continuously share customers and make referrals to each other. Staff will continue to actively participate on many boards and committees to provide an increased knowledge of available supportive services. Staff also serves on the local Management Board (LMB) and the Disconnected Youth subcommittee. We participate in planning sessions with the LMB and have been a supporting partner for Carroll County Youth Services Bureau's (CCYSB) grant application. The outreach and stabilization grant identifies how the (CCYSB) will refer youth to BERC's youth program and participate in co-case management. In Fall of 2020, WIOA partner agencies attended a two-day virtual training on "Bridges Out of Poverty" sponsored by our LMB.

An example of braided funding that we leverage is with the TANF program. BERC may provide training for a TANF recipient and the TANF program is able to fund supportive services such as childcare and transportation to allow the individual to attend training. BERC is the hub for the local area transit that brings riders into Westminster. Multiple transfer routes run between 7:30am-5:00pm Monday-Friday making the AJC available to many more individuals.

(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.

As the Mid-Maryland Workforce Area dissolves, Carroll continues to focus on a demand-driven workforce system based on the needs of our businesses. We access our board members to provide a voice in the delivery of workforce development activities. We regularly gather information from our industry-specific recruitments. We target industries based on both formal and informal LMI and priority industries identified in Section 1. When meeting with businesses, whether individually or in groups we specifically discuss and

identify training requirements. We work with our partners including the Community College and the Economic Development Office and their related advisory groups to obtain this valuable information. Our job-seeking customers are required to research skills needed in the local area and share that information with their counselors. This is another avenue we use to identify types of training required by local and regional business. Title 1 staff participate on the Carroll County Chamber of Commerce committees to glean information and engage businesses. Another strategy we use is industry sector partnerships to identify skill requirements and to develop work and learn opportunities such as: registered apprenticeships, on-the-job-training, internships, work experience, incumbent employee training and any other work and learn opportunities that are in demand by our businesses community. Carroll has identified manufacturing as a targeted industry. Manufacturing is one of the largest industry sectors in our County and as a result a local manufacturing consortium was formed to provide a forum for discussion on the challenges facing the industry. Representatives from Carroll Community College, the Dept. of Economic Development, Dept. of Commerce, and WIOA Title I participate in these quarterly meetings to hear from the local businesses and work together towards solutions.

# (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.

In our commitment to serving businesses, the Carroll Workforce Development Board will:

- Communicate with industry groups to inform and update about career pathways and EARN
  Maryland initiatives and use their feedback to inform in-demand training.
- Communicate with the region's industry groups to cultivate industry-led partnerships as well as access board members and their connections.
- Ensure available training matches the area's workforce needs.
- Stay apprised of and advocate for K-16 career pathways programs and beyond particularly advocating for business and industry connections for work experience and internships.
- Support job readiness training.
- Support business and education activities including mock interviews with professionals and workforce staff. Several times per year staff participates in mock interview sessions for youth and adult jobseekers; the WDB supports structured mock interview sessions
- Sponsor Meet and Greets with industry representatives and invite school personnel. We encourage participation with Chamber of Commerce and Economic Development meet and greets
- Host Career Fairs to include industry professionals.
- Educate businesses to the advantages of apprenticeships. Host business to business roundtable discussions.

One notable industry led partnerships in the area is the Manufacturing Consortium. Based on roundtable discussions between participating companies from the Manufacturing Consortium and workforce staff, Mid-Maryland/Carroll was awarded its first incumbent employee training contract to a local manufacturer. The Manufacturing Consortium will continue to meet quarterly to discuss industry needs and workforce solutions.

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

We have strong partnerships with many community-based organizations in our area. The workforce development system is supported by many of these organizations. Bridges to Housing Stability and the Human Services Program (HSP), grantee of the local Community Block Grant, provides housing for homeless or those at risk of becoming homeless. They refer clients to the AJC for workforce assistance and we refer clients to them. The Westminster Rescue Mission, a faith-based recovery program for men and women has become a successful community partner within the past year. The AJC team, of Title I and the DVOP, provide outreach seminars that have resulted in several successful outcomes for participants

seeking career training. Three participants from the program completed trainings and were employed upon completion.

### Section 4 – American Job Center Delivery System

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

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

The Business/Employment Resource Center Comprehensive Site 224 North Center St Westminster, MD 21157 410-386-2820 One Stop Operator-Michael Lawrence, Community Workforce Advancements 26558 Burrsville Road Denton, MD 21629

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

Carroll AJC uses a customer-centered approach. Our customer flow is designed to provide wrap-around assistance to the job seeker from the point of entry to point of exit. Through various means of both formal and informal assessment, staff and partners determine the customer's level of job readiness and identify resources, which are applicable to the customer's needs and goals. In order to maximize services provided to the job seeker, the Carroll AJC has developed partnerships with both WIOA and local community partners and other resources that are coordinated to ensure uniformity and minimize any duplication of effort. Referrals are made to the appropriate partner(s). Carroll partners have implemented a common referral form that is managed through the One Stop Operator. All partners are encouraged to utilize the form for consistency, tracking and follow-up of customer referrals.

The Carroll AJC's eligibility process includes an interview, evaluation, and career planning assessment. The process is designed to acquaint the job seekers with the resources and services available. At this time, any need for other partner or community services is identified and the appropriate referrals are offered. Job seekers are highly encouraged to register using the MWE system. Staff assistance is provided. For those job seekers who meet Adult, Youth, or Dislocated Worker eligibility guidelines and are interested in WIOA individualized services, required documents are collected and reviewed. The exception to described process is Veterans. Carroll WDA follows the WIOA guidelines regarding Veteran services.

Based on the initial assessment, which determines the customer's level of job readiness and customer need, services may be provided such as: basic career services, individualized career services, referral to partner services, support services and follow up. In cases of referral, or if two or more agencies are working with a customer, then collaborative case management may be implemented to best meet the needs of the customer.

Basic career services may include the initial assessment of needs, assessment of skill levels and literacy, referral to partner services, information on training providers, labor market information, career counseling and assistance with applying for unemployment insurance benefits. Individualized career services may include comprehensive and specialized assessments, development of an Individual Employment Plan, case management, career planning, short-term pre-vocational training, education, and training. Follow up services, including workplace counseling, will continue for a minimum of twelve (12) months after the customer exits the Adult, Dislocated Worker or Youth program.

(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.

We competitively bid the One Stop Operator through the County government's procurement office in accordance with WIOA law and regulations. Selection of the One Stop Operator is made by WDB members after review and rating the submitted proposals. The board has the option to renew three additional years in one-year increments.

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

The Local Board supports a demand-driven system based on labor market need. We assess the business needs of the region and share that information. We encourage training providers to place in demand training programs on the ETPL and encourage job seekers to use eligible providers of training that meet the regional demand. Mid-Maryland requests job seeker and business customer feedback regarding their experience with eligible providers of service. We formally and informally monitor providers of service. We evaluate if they are meeting our local employment needs. If we receive negative feedback about a provider then staff further investigates the concern. Staff may visit the provider to ensure that the appropriate services are being delivered. We share feedback with eligible providers so that they may effectively adjust services.

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

We use technology to communicate with customers through various means such as email, mobile phones, texts, social media, websites and virtual meetings. Technology is used for the accommodation of disability to create access to staff and services. Free WIFI is available in many areas of the County which allows for ease of communication. We use social media and MWE to advertise events and provide information about our services. We have the technology available for staff and customers to have a video conversation and/or counseling session.

In an effort to provide the most-customer friendly service possible, job seekers are encouraged to use the MWE system from any location where there is internet access, including their homes. Customers use the mobile MWE app for ease of use for job search and access to resumes for online job applications If individuals do not have internet access at home and cannot get to a physical AJC, Carroll libraries, schools and local businesses offer WIFI connectivity and hot spots.

AJC staff provide services at various locations to increase outreach such as libraries, hospital, community resource fairs and community partner agencies where customer may be receiving other services. Our focus and effort is to meet people where they are and not create additional barriers to services. We use extensive electronic distribution lists to inform the community of services being delivered by the AJC.

Carroll County Government has set up the AJC in Carroll County as the hub for their transit system allowing riders from all corners of the county access to the services.

(F) A description of the roles and resource contributions of the AJC partners. DWDAL's policy on Memoranda of Understanding and Resource Sharing Agreements can be found here: http://www.labor.maryland.gov/employment/mpi/mpi9-16.pdf.

Carroll Workforce continuously strives to deliver a comprehensive and integrated system that provides a "no wrong door" approach to service delivery. We work closely with our AJC partners toward achieving this goal. We expect this enhanced collaboration between the partners will lead to better service for businesses and job seekers. Resource sharing will be accomplished through a mutually agreed upon and WIOA compliant Resource Sharing Agreement. Updated roles of partners will be coordinated through the development of a Memorandum of Understanding. The goal of the AJC is for customers to leave feeling more empowered to meet their workforce development goals than when they entered. The ultimate role of each partner is to assist customers in meeting employment and training goals that support quality of life.

The AJC partners work together to coordinate job seeker and training services, business services and labor market information. Our goal is to ensure that businesses have skilled workers and job seekers have access to employment and training resources. Available programs and services include but are not limited to:

#### **WIOA Title I and Wagner Peyser**

• Career Centers w/Internet, copying, faxing, etc.	Business Consultation
Maryland Workforce Exchange (mwejobs.maryland.gov)	Labor Market Information
Job Search Workshops and Seminars	Youth Services
Career Assessment , Counseling and Planning	Training Information and Services
Résumé and Interviewing Assistance	<ul> <li>GED   National External Diploma Program (out of county) Information</li> <li>English Language Learner Information</li> <li>Adult Basic Education</li> </ul>
Veteran Services Program	Grants and Outplacement Assistance (Businesses)
TRADE Act Program (TAA)	Tax Credit information
Migrant Seasonal Farmworker Program (MSFW)	Unemployment Insurance (UI) Information

Maryland's Veterans' Program provides veterans' activities authorized under Chapter 41 of Title 38, United States Code. Veterans receive preference in all services as outlined by the law. The RLVER assumes functional supervisory responsibility for the Veterans' Program as well as community outreach. The DVOP provides career-coaching and case management services to veterans with significant barriers to employment. Additional services include outreach, individual employment plans, and collaboration with and referral to other partner agencies for additional services as needed.

**Division of Rehabilitation Services (DORS)** offers programs and services that help people with significant disabilities become successfully employed. DORS also has programs tailored for high school students with disabilities who are making the transition from school to employment, higher education or vocational training. Available programs and services include:

- Career decision making and counseling, to help find a career path that best suits interests and abilities
- Rehabilitation technology services, to find solutions to help perform the job to the best of one's ability
- Employment and skills training
- Job search and placement services
- Job coaching and supported employment services

DORS also provides vocational and other training services, including personal and vocational adjustment training, and accommodations. Also provided are interpreter services, reader services, rehabilitation teaching services, orientation and mobility services for individuals who are blind. Job search and placement assistance, job retention services, supported employment and post-employment services are available to assist with regaining, maintaining or advancing in employment. As part of the community partnership, DORS is aware of and utilizes other partner services necessary to assure that job seekers with disabilities secure needed services. DORS is co-located at an AJC which provides ease of access and information flow.

Adult Education and Literacy Act offers classes for individuals who are interested in improving skills in reading, writing, and math or learning to speak and understand the English language. They may also prepare to earn a high school diploma through GED tests or the National External Diploma Program (NEDP).

#### Available programs and services include:

- GED Prep and Testing and English Language learning
- Adult Basic Education
- Assist adults to become literate and obtain knowledge and skills necessary for employment and selfsufficiency.
- Assist adults who are parents to obtain educational skills necessary to become full partners in the educational development of their children.
- Assist adults in the completion of a secondary school education.

The Carroll Community College provides adult basic education and literacy training in Carroll County. Title I customers are referred to GED and External Diploma programs (customers may choose a program outside of Carroll- CCC no longer offers NEDP), based on the customers' needs. Carroll Community College is co-located in an AJC, facilitating ease of access and resource sharing. We have an MOU for providing services and sharing information.

Maryland's Temporary Assistance to Needy Families (TANF) program, also called Temporary Cash Assistance (TCA) provides cash assistance to families with dependent children when available resources do not fully address the family's needs and while preparing participants for independence through work. Families may also file an application for assistance with childcare costs.

The AJC will continue to serve as a host site and refer individuals to the SCSEP Program.

#### **Unemployment Insurance provides:**

- A direct point-of-contact with the Division's Inquiry-Correspondence Unit to assist with general concerns regarding Unemployment Insurance matters and to facilitate claims by filing by telephone or online;
- Training or assistance to staff to provide a general understanding of the Unemployment Insurance claims filing process;
- Informational pamphlets regarding Unemployment Insurance;
- Coordinating Rapid Response services with the Dislocation Services Unit, when requested; and
- Access to relevant Unemployment Insurance data in compliance with Federal confidentiality requirements

**HSP, Inc.** Carroll's Community Action Agency provides a monthly financial literacy workshops at the AJC and virtually as their contribution to the RSA.

(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).

We will use ITAs to support the labor market demand in our WDA and in the Region. We will assess the client's background, education, skills, abilities and goals to identify training that will prepare them for high demand and/or difficult to fill positions. The Local Board has identified priority industries referenced in 1 (A). However, if a business has a particular need, there is a strong likelihood the training will result in a job, or it will allow the individual to start on a career path, we may provide training outside of the priority industries.

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

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

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

Federal citations: 38 U.S. Code § 4215 - Priority of service for veterans in Department of Labor job training programs - <a href="https://www.gpo.gov/fdsys/pkg/USCODE-2008-title38/pdf/USCODE-2008-title38-partIII-chap42-sec4215.pdf">https://www.gpo.gov/fdsys/pkg/USCODE-2008-title38/pdf/USCODE-2008-title38-partIII-chap42-sec4215.pdf</a>; A Protocol for Implementing Priority of Service For Veterans and Eligible Spouses: <a href="https://wdr.doleta.gov/directives/attach/TEN/ten2010/ten15-10a1.pdf">https://wdr.doleta.gov/directives/attach/TEN/ten2010/ten15-10a1.pdf</a>.

#### **Priority for Adult Funds**

Section 134(c)(3)(E) of WIOA establishes a priority requirement with respect to funds allocated to a local area for adult employment and training activities. Under this section, staff responsible for these funds must give **priority** to recipients of **public assistance**, **other low-income individuals**, **and individuals who are basic skills deficient** in the provision of individualized career services. Priority must be provided regardless of the level of funds.

Veterans and eligible spouses continue to receive priority of service for all DOL-funded job-training programs, which include WIOA programs. However, as described in TEGL 10-09, when programs are statutorily required to provide priority for a particular group of individuals, such as the WIOA priority described above, priority must be provided in the following order:

- i. 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.
- ii. Second, to non-covered person (that is individuals who are **not** veterans or eligible spouses) **who are included in the groups given priority** for WIOA adult formula funds. The targeted groups are:

#### Target Populations: Individuals with Barriers to Employment

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

Employed Adults who are low income (see below) will also be given priority in Carroll. According to the Baltimore Metropolitan Council's Opportunity Collaborative Workforce Study, a family supporting wage is \$22.28/hour in the Baltimore Metropolitan area. Therefore, we choose to include employed adults meeting 175% of poverty guidelines as a priority. Customer notes will reflect eligibility for this priority.

- iii. Third, to veterans and eligible spouses who are not included in WIOA's priority groups.
- iv. Last, to non-covered person outside the groups given priority under WIOA.

Employed adults must be "low income" individuals. The term "low income individual" means an individual who received an income, or is a member of a family that received a total family income, for the 6-month period prior to registration for the program that, in relation to family size, does not exceed 175% of the USDOL Lower Living Standard Income Level. Additionally, an individual receiving, or determined eligible to receive food stamps during the 6-month period prior to application; an individual who qualifies as homeless under the Stewart B. McKinney Homeless Assistance Act; or an individual with a disability whose own income meets the definition of low income, but who is a member of a family whose income does not meet the definition. CWDA recognizes TEGL 7 -20 priority of service for Adults and in keeping with guidance must ensure that at least 50.1 percent of participants receiving individualized career and training services must be from at least one of the priority groups identified above.

Basic skills deficient means, with respect to an individual— (A) who is a youth, that the individual has English reading, writing, or computing skills at or below the 8<sup>th</sup> grade level on a generally accepted standardized test; or (B) who is a youth or adult, that the individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

VETERAN; RELATED DEFINITION. — VETERAN.—The term "veteran" has the meaning given the term in section 101 of title 38, United States Code. (B) RECENTLY SEPARATED VETERAN.—The term "recently separated veteran" means any veteran who applies for participation under this Act within 36 months after the discharge or release from active military, naval, or air service.

Note: When past income is an eligibility determinant for Federal employment or training programs, any amounts received as military pay or allowances by any person who served on active duty, and certain other specified benefits must be disregarded for the veteran and for other individuals for whom those amounts would normally be applied in making an eligibility determination. Military earnings are not to be included when calculating income for veterans or transitioning service members for this priority, in accordance with 38 U.S.C. 4213.

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

We have developed an Incumbent Worker Training Program with the guidance of our board. Per policy, Carroll may use up to 20% of Adult and Dislocated Worker funds to provide Incumbent Worker training. The program allows businesses to create additional job opportunities through job promotion, improved worker retention or layoff aversion by increasing the skill level of the existing workforce. These are employer-based training projects targeted for in-demand industries, and industry sectors identified in Section 1. Eligible business are responsible for a percentage of the approved training cost.

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

Customer service is the foundation of the AJC and WIOA partnership in Carroll County. We consider everyone with whom we come in contact to be our customers, both internal and external to our system. Both formal and informal mechanisms are used to track customer service. Our AJC has an excellent reputation for customer service. Customer feedback is key to the development of staff training and continuous service delivery improvement. Professional development and certification remain a priority for the Carroll Workforce Area. The One Stop Operator, at the consensus of the WIOA partners, arranges topic specific trainings on a quarterly schedule. All AJC partners are encouraged to attend the annual Raising the Bar conference for professional development and to establish statewide networking connections.

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

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

The Carroll American Job Center is committed to a customer-centered design recognizing that our customers include businesses and job seekers. All WIOA services are available to Adults and Dislocated Workers either directly in the Area's AJC or through the vast network of community partners, public and private training institutions, vocational technical centers, community colleges, private proprietary schools, and four-year public and private educational institutions.

We support an integrated service delivery system for job seekers and business. Everyone may access career services and we encourage the use of the Center through orientations, outreach, referrals, and events. We will continue to prepare an educated and skilled workforce that meets the needs of local businesses. Our workforce system has the resources, services, and tools to assist individuals in obtaining and maintaining good jobs and improve employment prospects for success. All job seekers have access to job search tools and resources at the Center, such as, MWE and other internet-based job search websites; linkages to community partners; access to local, regional, and national labor market information. In addition, we conduct and develop job search workshops facilitated by experts. These workshops are designed to assist targeted populations based on regional workforce needs.

We will continue to work closely with our customers to address and remove workforce barriers. This includes assessing and determining job readiness, identifying the need for other supportive services, assisting with resume development, and advocating for the customer to be competitive in the labor market. As a nation and a workforce area, we have become aware of a gap or inequity in technology. Often, we find that our older customers, disadvantaged youth, ex-offenders, as well as other citizens in our area often had not had the access to and understanding of digital technology. Not only is technology necessary in the workplace but it have become essential in conducting personal business. We provide employment services for the local shelter, citizens who do not have access to local libraries during the pandemic and offenders who have limited access to technology. This has challenged us to look at technology as a place of not only illiteracy but inequity and have begun to address future areas of training and development. These areas will include online interviewing skills, networking, job search, resume, and video resume workshops. We will further create workshops for customers that support their understanding of technology and how to use it. We will also expand our relationship with our local Tech-Council for computers and technology training.

We assist job seekers in acquiring industry-recognized credentials for in-demand jobs. This is accomplished through staff-assisted career services to include, but not limited to, comprehensive assessment, counseling, case management, funded training, work-based training experiences including OJT, TJ, internships, and registered apprenticeship opportunities.

The Business Services team participate in sector partnership activities in the identified key industries. We engage employers in discussions on in-demand and growth industries, training needs, skill gaps, and future needs. The information gathered assists in the identification of in-demand short-term training that results in industry recognized certificates and credentials. This leads to a talent pipeline of individuals who possess the knowledge, skills and abilities that match the labor market demand.

BERC organizes virtual and site-based job fairs and recruitment events throughout the year to assist business with their hiring needs and to help job seekers reach their employment goals. These recruitments are industry-focused and demand-driven, based on needs local and regional employers. BERC will continue

to offer these job fairs and specialized recruitments as a service to area businesses.

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

BERC provides rapid response activities in response to WARN notices and other layoff situations to dislocated workers by conducting on-location information sessions where closings or staff reduction is We collaborate with MD Labor, WIOA partners and other workforce areas to provide comprehensive information on available WIOA services, job leads, unemployment insurance, lavoff aversion strategies and information on TAA, as applicable. We invite representatives of the Carroll County Health Department to attend Rapid Response sessions to provide information on available health benefit options. The dislocated workers are encouraged to access the full array of services available under WIOA and visit the American Job Center. The identified workers are provided information and instruction to register in the Maryland Workforce Exchange and other online job search sites. BERC works cooperatively with partners to diminish the time between the Rapid Response and the individuals obtaining reemployment. In the future workers who are affected by a closure may face significant barriers because of the pandemic and potentially after the pandemic is over due to shifting ways employers and business interact with workforce. Due to this we have invested in technology to go directly to the customer or to meet the customer online. Our goal is to be able to support the customer where they are. Future areas of exploration will be to hold online recruitment events, based on skills of impacted workers and labor market demand. This will eliminate the transportation barrier and gave the affected workers direct access to future employers both locally or regionally in targeted recruitments. We believe this model will prove to be flexible and effective for future Rapid Responses.

(C) A description and assessment of the type and availability of youth workforce development activities in the Local Area, including activities for youth who are individuals with disabilities, which description and assessment shall include an identification of successful models of such youth workforce development activities. DWDAL's policy on the Title I Youth Program can be found here: <a href="http://www.labor.maryland.gov/employment/mpi/mpi8-15.pdf">http://www.labor.maryland.gov/employment/mpi/mpi8-15.pdf</a>

BERC uses a customer-centered design in the delivery of all services. As previously mentioned, we pride ourselves on customer service and youth is no exception to this. We treat each youth as an individual; therefore, we design a plan for each person. Many out of school youth are in need of their high school diploma. We partner with Adult Education to assist youth with GED preparation. In Carroll County, a high school diploma is necessary for most jobs and is certainly a pre-requisite to start on a career path. We provide assessments for youth to assist them in identifying potential careers. Once a career has been identified, they may have the opportunity to attend occupational skills training. As we emerge as an independent area, we will continue to provide the 14 required elements through our Youth Team members. We are working diligently to enhance our community business partnerships along with our relationships with our local government agencies to improve and create career opportunities and pathways for our youth customers.

To build upon and expand our successful youth program, we are fortunate to have recently solidified a stronger working relationship with our seven public high schools in Carroll County. This began through a concerted effort with Carroll County's most diverse high school, Winter Mill High School. Through multiple meetings with the career and counseling staff we determined that we could support team by creating desk top aids, resource packets to be given directly to the students, flyers to be placed in strategic areas and QR codes that the students could scan that put them in direct contact with our team for support. Our goal is to roll this model out to the six other high schools in the 2021 school year.

We host youth in the workforce centers to practice mock interviews with local businesses. We partner with DORS to administer their summer youth program, which is another opportunity for youth with disabilities to obtain actual work experience.

The school systems CTE offers a variety of programs that are designed to prepare students to be successful in the career field of their choosing. Career areas currently include: Arts, Media, and Communication; Business, Management and Finance; Construction and Development; Consumer Services, Hospitality, and Tourism; Health and Biosciences; Human Resource Services; Information Technology; Manufacturing, Engineering and Technology; Transportation Technologies; and Career Research and Development. Each field has an advisory committee to bring the most realistic up-to-date information to the students. This model has been very successful in assisting students with entering college or pursuing other work staff participates on advisory boards.

Another model is Job Corps. Job Corps is a free education and training program that helps young people prepare for a career, earn a high school diploma, and secure a good job for a sustainable lifestyle. For eligible young people at least 16 years of age that qualify as low income, Job Corps provides the all-around skills needed to succeed in a career and in life.

Funding was awarded from the Governor's Office on Children to the Carroll County LMB for a Disconnecting Youth Program administered by the Carroll County Youth Service Bureau in partnership with the Human Services Program (Community Services Block Grant) and the Title 1 WIOA Youth Program. This inter-agency partnership's goal is to provide a coordinated county-wide approach to reengage disconnected youth and reduce youth homelessness. This team of agencies uses complementary programmatic strengths to successfully remove barriers and contribute to achieving the long-term goal of re-engaging disconnected youth.

(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.

BERC continues to work closely with the public schools for referrals to our youth program and they often refer families in need of workforce services too. We have relationships with the counselors at the various high schools who refer students who are dropping out of school and/or are potential AJC customers. We work very closely with our community college partners, referring students to one other and coordinating services. BERC staff are active participants of community agency boards including the Carroll County CTC advisory board, the Carroll County Transition Council and the Local Management Board ensuring a voice in the development and collaboration of youth services in the county.

Our newly developed Carroll Workforce Board will appoint a youth committee that shall serve as a venue for partners to establish coordinated education and workforce development activities. Carroll has several networking committees and boards that meet regularly to discuss and plan for the needs of the identified youth. Aside from the more traditional post-secondary activities, we are focusing on increasing youth awareness of the trades with emphasis on apprenticeships as alternative career path toward a sustainable lifestyle. These committees are comprised of WIOA core partners as well as the public schools, public libraries, and non-profit and government service providers.

Open communication among partners allows for unduplicated service and enhanced coordination among partners.

A collaborative agreement exists between the AJC in Carroll County, along with 28 other agencies/programs, with the Carroll County Public Schools "Judy Center" that provides comprehensive integrated services for young children and their families for promoting school readiness. BERC, the Carroll

County AJC, partners by offering services such as career exploration, skill assessments, assistance with using the Maryland Workforce Exchange, job search, resume assistance and information on employer expectations and work readiness to parents and age appropriate youth.

# (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.

Supportive services may be provided to those who are participating in programs and activities authorized by WIOA and who are unable to obtain such supportive services through other programs providing such services. Customers are referred to the appropriate organizations providing the services before accessing WIOA funds for supportive services. BERC may provide supportive services, as WIOA funding allows, to an individual on an as-needed basis.

Limited public transportation in Carroll County has effects on job seekers' ability to obtain and retain employment as well as for local businesses limiting their workforce. Transportation is a primary supportive service BERC provides, especially for youth. BERC's parent organization, the Department of Economic Development represents the workforce transportation challenges on the Carroll Transit Board. Carroll County Government has set up the AJC as the hub for the transit system allowing riders from all corners of the county access to the AJC.

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

We intend to provide the full array of workforce services to all eligible adults with priority given to targeted populations including: veterans and eligible spouses, economically disadvantaged individuals including TANF recipients, individuals who are basic skills deficient or have limited English proficiency, individuals with disabilities, offenders, homeless and other in need populations. Services provided include workshops, one-one and group counseling, development of individualized employment plans, skills analysis, labor market information, occupational skills training, job preparation and job search assistance. We will continue to work with our partners in the community to provide comprehensive services and referrals.

Priority is given to the adult groups specified in the state plan. Through an initial assessment, we will identify individuals qualifying for POS. BERC may use funding to provide the full array of basic, individualized and follow-up services. This may include: outreach, staff services, counseling and guidance, assessment, support services, coursework, training, registered apprenticeships, transitional jobs, and other work and learn opportunities, incumbent worker training, the use of ITAs and/or classroom-sized training, contracts and any other allowable workforce service that will benefit the job seeking customer and regional economy.

We will expand our outreach to these populations. Our ultimate goal is for these populations to reach self-sufficiency. Together with the job seekers we serve, we evaluate their short and long-term goals, and develop an individualized employment plan that will map out a path to achieving their identified goals. As funding is available we provide training that allows for someone to begin employment above entry-level and continue on a career path. Together with the job seeker, BERC will fund training that will lead to employment in the local and regional labor market. Meeting the needs of business is a priority when assisting customers focusing on a career path. We will prioritize the industry sectors referenced in Section 1 of the Plan. Using a business-driven model we will develop career pathways with our partners when it most beneficial to both the business and job seeker customer.

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

We intend to provide workforce services to all eligible dislocated workers. Services provided include workshops, one-one and group counseling, development of individualized employment plans, skills analysis, labor market information, occupational skills training, job preparation and job search assistance. We will continue to work with our partners to develop comprehensive referrals and services.

BERC may use funding to provide the full array of basic, individualized and follow up services. This may include: outreach, staff services, assessments, support services, coursework, training, registered apprenticeships, transitional jobs, other work and learn opportunities, incumbent worker training, the use of ITAs and/or classroom training, contracts and any other allowable workforce activity. Dislocated worker funding may be used to support business services. These services are not limited to but may include: job fairs and job matching, industry specific recruitments, industry sector partnerships, retention, incumbent worker and on-the-job training, assessment, roundtables, and any other allowable WIOA activity that enables us to further understand or respond to business needs that support the local economy. We will use Dislocated Worker funds to support Rapid Response activities in the area as funding allows.

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

#### Self-sufficiency for employed adults and employed dislocated workers will be defined as follows:

Carroll Workforce Area will utilize Mid-Maryland's definition until we have the opportunity to review the ALICE report to redetermine self-sufficiency in Carroll County in 2021. The ALICE Survival Budget and Stability Budget reports will be used to steer the Board's efforts in determining this.

<u>Employed Adults</u> –self-sufficiency is defined as exceeding 175% of the USDOL Lower Living Standard Income Level

Mid-Maryland - Employed adults must be "low income" individuals. The term "low income individual" means an individual who received an income, or is a member of a family that received a total family income, for the 6-month period prior to registration for the program that, in relation to family size, does not exceed 175% of the USDOL Lower Living Standard Income Level. Additionally, an individual receiving, or determined eligible to receive food stamps during the 6-month period prior to application; an individual who qualifies as homeless under the Stewart B. McKinney Homeless Assistance Act; or an individual with a disability whose own income meets the definition of low income, but who is a member of a family whose income does not meet the definition.

# **Employed Dislocated Workers** – self-sufficiency is 75% of the wage at dislocation.

Employed dislocated workers may qualify for services as needed to retain employment leading to self-sufficiency or if their current wage is less than 75% of their wage at dislocation. The training request must be reasonable in relation to the current use of training dollars, and local labor market conditions (high growth/high demand) and what appears to be a prudent use of taxpayer dollars.

- (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.
  - This determination is made when the dislocated workers are laid off from positions with skill sets that are considered obsolete.
  - If the local market is saturated with similar skill sets and retraining would increase their chances for

- successful employment at a self-sufficient or previous wage or better.
- The industry/occupation requires additional training for the job seeker to have the skills the current labor market demands to obtain employment.
- Labor market information, both formal and informal, has shown the industry or occupation as declining.
- Individual cannot return to their previous industry or occupation due to age, ability, illness/injury, disability.
- Individuals that may have worked seasonally can be considered unlikely to work in a previous industry or occupation as a temporary or seasonal worker.
- Individuals have conducted dedicated but unsuccessful job search in the previous industry/occupation for over three months as evidenced by employer rejection letters or employer contact logs.
- (J) A description of how the Local Board will interpret and document eligibility criteria for in-school youth and 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). http://www.labor.maryland.gov/meployment/mpi/mpi8-15.pdf

This is defined as a need for additional education, vocational training, or intensive career counseling related assistance, in order to enter and/or participate successfully in regular schoolwork or to secure and hold employment. It is further defined as follows: a lack of employability skills, including social skills; an inability to retain jobs (lost two or more jobs during the 12 months preceding eligibility determination), documented by the counselor during assessment; or, a lack of prior work experience (the youth has not worked for the same employer for longer than three consecutive months in the one-year preceding eligibility determination), documented by the counselor during assessment.

(K) A description of how the Local Board will interpret and document eligibility criteria for out-of-school youth and 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). <a href="http://www.labor.maryland.gov/meployment/mpi/mpi8-15.pdf">http://www.labor.maryland.gov/meployment/mpi/mpi8-15.pdf</a>

We shall interpret and document eligibility criteria for in-school and out of school youth in accordance with MD Labor policy issuances 2015-8 and 2018-16, related TEGLS, regulations and WIOA law, section 129 and WIOA final regulations. We will collect required documentation and maintain it in either hard copy or electronically. We will document eligibility in MWE.

- (L) A description of the documentation required to demonstrate a "need for training".
  - Area Labor market information is used to demonstrate the need for training. Data, job openings, ONET, employment opportunities, employer needs or other relevant information may be used to demonstrate the need for training.
  - Case notes should document the need for training.
  - If a potential employer requests specific training in order for an individual to be hired, that will be considered a "need for training."
- (M)A description of how the Local Board will provide the fourteen required program elements for the WIOA Youth program design.

The 14 elements are provided through community partners and WIOA Title 1 staff. Our goal is to help any youth between ages 14-24 prepare for a productive and meaningful adulthood. We help youth explore

and obtain career and training opportunities, find, and keep the right job. We encourage and assist in obtaining a high school diploma and continue lifelong learning. To this end, we partner with our adult education providers to assist in preparation for obtaining a high school diploma. We work closely with our community colleges and other training providers to provide in-demand occupational skills training for youth.

Carroll Counties youth program provides the 14 elements through WIOA Title 1 staff, and partner organizations. The program design gives youth the opportunity to participate in a comprehensive year-round program. The enrollment process begins with orientation, eligibility determination and an objective assessment where CASAS testing and the Individual Services Strategy (ISS) are completed. CASAS results are shared between Adult Ed providers and WIOA Title 1 staff to reduce the duplication of testing, when possible. Staff then determines an appropriate track or tracks for youth based on the results of the comprehensive assessment. The available tracks are Education, Work-based training and Credentialing and are described as:

Education Track - designed for the youth that need to obtain their Maryland High School diploma or increase their basic skills. Services may include but are limited to:

- Tutoring
- Study Skills instruction
- Basic Skills assessment
- GED Classes
- Successfully obtaining GED or high school diploma
- ABE classes
- English Language Learner (ESL)

Work-Based Training Track – uses a variety of paid work experiences to help youth attain and/or improve work readiness skills and obtain unsubsidized gainful employment.

# Career exploration and assessment

- Work skills assessment
- Interest inventory
- Labor market information research;

#### • Employment Preparation

- Career Interest Assessments
- o Work and Learn may be in conjunction with GED or other occupational skills trainings.
- Paid Work Experiences
- On-the-Job Training (OJT)
- Other subsidized employment

### • Successful gains are unsubsidized employment or entrance into the military

Credentialing Track – training for industry-recognized credentials linked to demand occupations

#### Career exploration

- Career Assessment
- o Labor market information research
- Job shadowing

# • Enrollment in training program

- o Financial aid training program
- o Registration completed
- o Classes scheduled
- o Earn certificate or credential

The development of the ISS is considered to be the "cornerstone" of the process for serving WIOA Out-of-School Youth. WIOA Youth Staff provide guidance and support for each youth to achieve their goals as outlined in the ISS. We use proven program activities and established partnerships that engage the youth in education and work essentials. Staff may utilize CareerScope, MWE, O\*Net and other career exploration tools to assist the youth in designing a career path and acquiring in-demand skill sets in an occupation that leads to stackable credentials for further career growth.

(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.

We will use multiple strategies to ensure that 20% of the Title I Youth program funding is used for work-based learning. The strategies may include but are not limited to:

- Paid Work Experience
- Paid internships
- On the Job Training
- Paid externship components of training programs
- Pre-apprenticeship/registered apprenticeship training

We will review the expenditures regularly to ensure that the 20% expenditure requirement will be met.

(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.

Our youth population is predominantly out of school youth. To insure we meet the 75% requirement we will continue to focus our efforts on recruiting this population. We plan to recruit youth from areas where out of school youth frequent in addition to using social media. We leverage on our community partners to refer youth to our program, for example, we utilize cross referrals through programs funded through our Local Management Boards. We use various forms of outreach to create visibility in the community. Due to the positive experience youth have in our program, many of our youth referrals are word of mouth from youth to their peers. The youth program has an excellent reputation and youth and community partners like to refer youth to our program. We will work with our partners and area schools to identify in-school youth that would be candidates for the youth program as they are in their last year of school who would benefit from a paid work experience and occupational training/apprenticeship to create a path to a sustainable living.

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

Basic career services are provided at the first point of entry into the workforce system based on the customer's needs identified in the initial assessment. If that first point of entry is an AJC an orientation to the American Job Center system services are offered to customers seeking employment and/or training information. They are also offered during the Reemployment Services and Eligibility Assessment Workshop (RESEA) and the Reemployment Opportunities Workshop (ROW) and on an individual basis. These orientations are facilitated by WIOA Title 1 and/or Wagner Peyser staff. The orientation process provides access to system-wide resources inclusive of partner and community services.

If a customer accesses services through partner programs not co-located at the AJC, basic career services may be provided by the partner agency at that location. If individualized career services will be offered through a partner program, that program will determine if other partners can provide additional individualized services and make appropriate referrals. Any assessments performed through partner programs are shared between programs using a common referral. An individual employment plan may be developed individually and shared jointly. We encourage joint case management. This avoids duplication and maximizes available services and funding.

Carroll Counties' AJC is co-located with Title I, Wagner-Peyser, and Adult Education which streamlines the communication process between programs as well as referral and joint case management. This co-location allows us to blend services that are responsive to our customers' needs. We will continue to work with our WIOA partners (DSS) Department of Social Services, (HSP) Human Services Programs, (SCSEP) Senior Community Service Employment Program and (DORS) Division Of Rehabilitation Services to better coordinate our services at the AJC. Carroll AJC staff coordinate with our partners and use a common referral to support both in person and online access to partner programs.

Regular joint meetings will continue to be held between partner programs to share information about services and work on continuous improvement of non-duplicative and customer focused processes.

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

Carroll Workforce staff will provide quarterly follow-up services as required for participants who exit the program, for up to 12 months after the first day of employment. Follow up services may include guidance and counseling, career development and further education planning, referral to community resources and assistance with securing better paying jobs, as customer need dictates. Reports are generated to ensure timely follow up that is conducted via telephone, text, virtual meeting, email, wage records or employer contact. Staff enter the follow up contacts in the MWE indicating results and required documentation.

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

This Section should include –

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

Title II Adult Education partner, Carroll Community College is physically co-located in the Carroll AJC and enjoys a highly collaborative working relationship. We have streamlined and implemented a referral process for job seekers identified as needing adult education and literacy services. Job seekers are provided information on adult education and literacy services during the initial orientation to the AJC and staff may attend Adult Education orientations to give information on AJC services. A common partner referral process is in place to reduce duplication of services and to create a more efficient intake system among partners. WIOA mandates help us to strengthen our existing partnerships. In our Area, achieving a high school diploma is essential based on the requirements of the labor market (see Section 1). Our goal is for individuals to eventually become self-sufficient and on a career trajectory. This may occur once they have obtained their diploma or concurrently if it will result in successful completion of both.

Carroll Workforce is open to any opportunity to create career pathways that create a career trajectory for customers and promote self-sufficiency. Currently, Carroll is not participating in a Career Pathways grant.

The Title II partner, Carroll Community College along with other WIOA Core partners will meet quarterly to ensure continuing alignment of services. Partner trainings are developed to broaden the understanding of services provided by core and community partners which serve to strength our service delivery to customers.

The Maryland Department of Labor will competitively select adult education and literacy providers. The Local Board chair will review applications in accordance with the guidance provided by the Department of Labor, Division of Workforce Development' Office of Adult Education and Literacy Services and will submit appropriate documentation and any recommendations of alignment of adult education with the local workforce development plan.

- (B) A description of how the Local Board will coordinate efforts with Title II providers to align basic skills and English language assessments. The description should include:
  - An outline of the agreed upon steps that will be taken to align basic education skills and English language assessments within the Local Area, including, but not limited to, any MOU entered into by the workforce development and adult learning partners;

Customer service is very important to the WIOA partners in Carroll County. We are already addressing alignment to avoid requiring duplicative assessments. Title I and II providers both use CASAS assessment tools and share assessment results We work to broaden testing availability and times to all customers. Understanding the stress and angst that testing and assessments may cause, we strive for best practices in assessment administration to create a successful customer experience. MOUs are written as to ensure continuing partnership and alignment.

• 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));

Student/client score information is shared in multiple ways. Staff at each program send score information through the students themselves to comply with FERPA and WIOA/Local area privacy requirements. A signed Release of Information allows us to share test scores.

• 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;

To promote customer service and expedite the testing process, partners may accommodate clients needing math and reading assessment from either Title I or Title II partners, if the client is appropriate and eligible for the assessment service. The primary partners administering assessments will be Carroll Community College/ Adult Education and BERC.

• An outline of how the Local Area will coordinate testing between workforce development and adult education providers; and

The AJC has a dedicated testing lab staffed by Title I that offers scheduled testing M-F. Title II Adult Education provider offers scheduled testing days and times prior to quarterly registration sessions. Coordinated scheduling allows for ease and availability of testing for customers.

 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.

In compliance with the assessment policy of the Maryland Department of Labor, Division of Workforce Development and Adult Learning, all test administrators and proctors complete assessment implementation training biennially as required by the test publisher (CASAS). CASAS provides online certification for Testing administrators and proctors (<a href="http://training.casas.org/">http://training.casas.org/</a>) DWDAL's policy on assessments can be found here: <a href="http://www.labor.maryland.gov/employment/mpi/mpi5-20.pdf">http://www.labor.maryland.gov/employment/mpi/mpi5-20.pdf</a>.

(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.

Carroll Workforce Area has a single Title II provider and the provider representative sits on the Local Board.

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

Information sharing happens regularly between the AJC and the Adult Education partner to ensure staff of all partner agencies are familiar with the services provided and eligibility requirements, and to facilitate cross-referrals and customer service. Adult Education and the AJC are co-located, and numerous Adult Education classes are held in the building, facilitating ease of referrals and contact for shared students/clients.

(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.* 

Carroll Community College Adult Education Program does not receive IELCE funds and does not have a referral process for learners interested in participation in Integrated English Literacy and Civics Education.

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

This Section should include –

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

The Carroll County local area has been co-located for over a decade and will continue to coordinate customer-centered services, in-person and/or virtually. The Office is operationally consolidated using a team approach. Many basic and individualized services in the AJC are handled by Wagner Peyser and WIOA Title I. All Basic career service functions have been integrated and cross training has been completed in compliance with the law and state personnel regulations. Features of the integrated system include an orientation process highlighting all partner services, a common resource area; common job search or job-related workshops; technology linkage; sharing of information, resources, and staff; combined staff meetings, integrated program planning and trouble-shooting; and a unified commitment to the Maryland Workforce Exchange.

The Business Service team works to provide a comprehensive "demand-side" service approach to the business community. The core team is WIOA Title 1, WP, DORS, RLVER. Depending on the type of service, a representative of the local community college, Rapid Response, DSS, and others may also participate. The team addresses employer needs, outreach to high growth/high demand industries/priority industries, and establishing goals, and recruitment efforts as well as any other item the business needs. We refer to partners and coordinating community resources as needed.

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

There are few Migrant Seasonal Farm Workers (MSFW) in Carroll County. Wagner Peyser staff conduct outreach activities for our area. If a migrant seasonal farm worker is identified they are contacted and provided with information on available services and how to access them. Outreach is also conducted to ensure compliance with the MSFW program to include appropriate housing/transportation/complaint procedures/wages.

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

The Rural Services Coordinator conducts MSFW housing inspections for our area, adhering to 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. MD DOL 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.

## Section 8 – Title IV – Vocational Rehabilitation Functions This Section should include –

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

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

- Provide intake, orientation, and assessments for job-seekers with disabilities
- Promote employment of persons with disabilities
- Based on a comprehensive assessment of an individual disabilities, determine an individual's eligibility for services in accordance with the Division's Order of Selection criteria
- Develop an Individualized Employment Plan
- Provide guidance and counseling, physical restoration, and training to financially eligible persons with disabilities
- Provide follow-up services to enhance job retention
- Provide other services as may be available and appropriate
- Provide Pre-Employment Transitioning Services for students with disabilities, as defined by WIOA
- Provide Supported Employment Services for youth and adults with disabilities as defined by WIOA;
- Provide independent living and blind services for seniors 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 Liaisons
- 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/.

Individuals with disabilities will receive services through the AJC. Customers with disabilities will have access to all services and will be referred to DORS if they need to receive services beyond those available through the other AJC partners. We will co-case manage customers and share resources to benefit the customer. In addition, our goal is to ensure that all information and services provided are accessible to individuals with disabilities. Adaptive equipment in the AJC has been upgraded to ensure compliance and accessibility. DORS

has part time representation in the AJC. This physical presence helps us enhance partner collaboration and maintain the warm hand-off of referrals. The Center has been reviewed for Section 188 compliance. We work to insure ease of accessibility and promote services for individuals with disabilities. DORS staff participate in local WIOA partner cross-trainings/ professional development activities in order to maintain familiarity with local partner services, initiatives, employer needs, marketable career pathways and best practices as well as share information. DORS customers participate in Center activities including workshops, job fairs, local recruiting events, and year-around and summer youth employment program.

Section 9 – Temporary Cash Assistance for Needy Families Functions With guidance and technical assistance from DHS and MD Labor, Local Areas will use a functional approach to integration which may include revised practices and policies related to:

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

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

This Section should include -

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

Our goal is to increase coordination across the programs to improve efficiency in service delivery and increase the effectiveness of the provided services. We believe a common intake process is pivotal to enhanced customer services. At the present time, the electronic data systems used by the various partners do not "talk" to each other. However, we have resolved this with the use of a common intake/referral form to share pertinent data. TANF/TCA customers have full access to the AJC resources and are encouraged to use the services of the AJC. We have processes in place to work with the ABAWD customers and are exploring methods to extrapolate what is working in order to improve outcomes for all customers. TANF/TCA customers participate in orientation with the AJC. The monitoring of attendance and participation is a joint responsibility between the AJC and the referring partner while communicating with case managers, as needed. We will continue meetings amongst partner representatives to keep the communication open for enhanced service delivery.

Additionally, LDSS staff may provide services at the AJC. Services provided will include assisting with applications for benefits, determining eligibility for DSS services or programs, and assisting current DSS customers with questions regarding their benefits. We will adjust frequency based on customer needs. This creates efficiency for the customers, so they are not required to visit multiple locations for services. This creates efficiency for customers, so they are not required to visit multiple locations for services.

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

- Co-location of LDSS and WIOA Partners at AJCs and 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 policy;
- 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.

Many of the Core partners serve on multiple community boards together. Much of the intent of these boards is to share information and continue to create common systems that better serve the WIOA customers. The LDSS and BERC in Carroll County have staff co-located at the AJC along with many other community partners including the DORS and others that serve economically disadvantaged individuals. The local DSS office periodically provides staff at the AJC, based on availability. As of this plan writing, the local AJC and local DSS are collaborating to develop strategies to maximize services to TANF/TCA customers, streamline communication and create a seamless approach to service delivery. The AJC staff provides orientation to WIOA services to TANF/TCA recipients at the LDSS and the Community College provides job readiness workshops, GED, and adult education programs.

We cross-train partner staff to share knowledge, promote commonalities across partners and expand directservices options available for customers. This will provide for consistently accurate information and that time spent at each agency is value-added.

The LDSS will provide updated information of WPR "countable" activities to partners, particularly the AJC staff, to increase the understanding of what is allowable. In Carroll County, we believe that when working with a potential employer we should focus on the individual's skill sets and what they can do for the business. We strive to fill the needs of our businesses with the best qualified candidates. Recruitments and job search activities, which occur in the AJC, are shared with TANF/TCA staff via email to forward to TANF/TCA customers. TANF/TCA staff utilize the online jobs board at <a href="https://www.carrollworks.com">www.carrollworks.com</a>. This will continue to be an ongoing practice. We support the single point of entry concept and share information.

We plan to meet with partners to identify ways to leverage existing financial and in-kind contributions through the Resource Sharing Agreement. Through our partner meetings, we are exploring ways to share baseline outcome data for the WIOA system.

(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 LWDB has a representative from Carroll County DSS on the Board to represent TANF expectations, outcomes, and data.

(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.

Our primary strategy will be for LDSS to refer TANF/TCA recipients to the appropriate WIOA partner programs most able to provide skills upgrades, occupational training and credentialing, life management skills, and employment. The partners will work together to improve work and life skills which lead to improving financial stability and independence of TANF/TCA recipients prior exiting the TANF/TCA program.

# **Section 10 – Community Service Block Grant Functions**

#### This Section should include -

- (A) A list of Community Service Block Grant (CSBG) providers in the Local Area and whether they provide employment and training activities. Community Action Agencies are a partner in the local workforce development system, irrespective of whether they spend money on employment and training. A map of Maryland's Community Action Agencies (CAAs) can be found here: <a href="http://www.maryland-cap.org/member-map.aspx">http://www.maryland-cap.org/member-map.aspx</a>.
  - The Human Services Programs of Carroll County, Inc. (HSP), a local non-profit with a rich history of assisting Carroll Countians through housing, energy and training programs, provides pre-employment and training activities through their Opportunity Works Program to formerly incarcerated individuals and to individuals experiencing homelessness.
- (B) A description of the implementation and coordination process to enhance the provision of services to individuals on CSBG that includes:
  - Potential co-location of Community Action Agencies (CAAs) and/or WIOA Partners at American Job Centers or CAAs depending on the nature of local partnerships and operations;
  - 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.

HSP, Inc and WIOA partners refer individuals between programs based on the need of the customer using a common referral; Carroll's AJC will provide a full range of employment and training services to individuals, referred from HSP, Inc. The AJC and local partners will refer to the agency for services not available at the AJC and which are provided by the CAA. The CAA in Carroll County will provide a Financial Education workshops at BERC once per month and virtually each week. The agency will provide timely notice of trainings and topics to be disseminated to WIOA and local community partners. HSP,Inc. participates in partner meetings where we address services to businesses and individuals. As partners are included on recruitment distribution lists so that business services are available to their participants. HSP, Inc. refers customers to BERC for co-case management as to avail them to the full array of services in the AJC. HSP, Inc. will provide data for shared reporting, outcomes and planning for future provision of services and working toward best practices in partnership.

# (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.

HSP, Inc. has been an active and contributing partner at the Mid-Maryland partnership meetings and staff trainings. HSP, Inc. has appointed membership on the Carroll Workforce Board. As a collaborative board member, HSP, Inc. will educate the LWDB of their role and responsibilities in fulfilling the expectations of the CSBG. Information will be shared regarding the constituents needs and contributions to Carroll's developing workforce and the local plan. HSP, Inc. shares membership on many mutual boards and committees in Carroll County that address the needs of our community members with barriers to employment and whom are most in need.

#### Section 11 – Jobs for Veterans State Grants Functions

This Section should include –

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

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

To receive Veterans Priority of Service for a specific program, a Veteran or eligible spouse must meet the statutory definition of a "covered person" and 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.

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

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

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

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

AJC staff provides core services and initial assessments to veterans.

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

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

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

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

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

#### **Verifying Veteran Status**

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

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

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

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

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

# Veterans and Spouses as Dislocated Workers

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

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

Generally, service members exiting the military, including, but not limited to, recipients of Unemployment Compensation for Ex-Military members (UCX), qualify as dislocated workers. Active duty service members who separate by retirement may also 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.

(B) 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 <u>Local Board</u> will promote LVER services through social media, job fairs and email blasts based on information provided to the <u>Local Board</u> by the LVER. The <u>Local Board</u> will include the LVER in employer meetings convened in support of determining employer needs related to Career Services, Training Services, or Educational Services. The LVER will be included in meetings and efforts convened by and on behalf of the AJC Partners, including meetings and efforts convened by the One Stop Operator.

# Section 12 – Trade Adjustment Assistance for Workers Program Functions

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

Trade Adjustment Assistance Employment and case management services include:

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

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

USDOL's Trade Adjustment Assistance Final Rule can be found here: <a href="https://www.dol.gov/sites/dolgov/files/ETA/tradeact/pdfs/TAA">https://www.dol.gov/sites/dolgov/files/ETA/tradeact/pdfs/TAA</a> Final Rule 1205 AB78.pdf.

This Section should include –

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

The Trade Adjustment Assistance Program is a required partner under WIOA. The TAA program is responsible for providing access to benefits and services to adversely affected workers through the AJC network. The program includes training, employment, case management, job search and relocation allowances, Trade Readjustment Allowances (TRA), and Reemployment Trade Adjustment Assistance (RTAA). Staff meets with participants face-to-face, explains how the TAA Program is a great opportunity that was created in the event an employer has moved their position abroad, as well as, explain to the participant how this is a chance to obtain schooling, training &/or certifications that will make them highly marketable in today's current workforce at no cost to the participant. Case management is provided to all TAA participants, which includes IEP development, setting/monitoring benchmarks and follow-up. TAA training is provided quarterly to keep staff up to date on regulation changes. Trade affected workers will be co-enrolled with the WIOA dislocated worker program or other appropriate program to ensure the availability of a comprehensive array of services and the integration of workforce development programs. Trade staff and WIOA partners will coordinate efforts to provide opportunities

for Trade affected workers to obtain skills, services, resources and support in a quick and effective manner to return the trade-affected worker back to suitable employment.

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

State merit 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 in MWE and to ensure the six criteria for training have been met, as well as create or review participants' IEP. Trade staff will also provide approval of all TAA training programs, training contracts and training waivers. Efforts will be coordinated to monitor progress, provide Benchmarks every 60 days and ensure a service is provided every 90 days for the Trade affected worker, as well as ensure any needs and barriers are addressed. Staff will coordinate on all employment, case management and follow-up activities. Title 1 and Title III staff will coordinate service delivery

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

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

# **Section 13 – Unemployment Insurance Functions**

This Section should include –

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

The federal-state Unemployment Insurance (UI) is a required partner in the comprehensive, integrated workforce system. We hold sessions for Unemployment Insurance (UI) claimants, adhering to the requirements of the Reemployment Services and Eligibility Assessment (RESEA) and Reemployment Opportunities Workshops (ROW) programs. State merit staff are currently managing the weekly RESEA and ROW programs to provide services to UI Claimants. The RESEA program requires core components: UI eligibility assessment, Labor Market Information (LMI), Wagner-Peyser enrollment, Individual Reemployment Plan and access to all appropriate AJC services, to support the claimant's return to work. We provide comprehensive services to our customers, and access or referrals to partner agencies. We strive to empower our customers with the skills and knowledge to conduct their job search with staff assistance or independently. We also assist job seekers with filing claims online and answering general questions. Title I information is provided in our RESEA and ROW workshops. There are UI and Workforce liaisons in headquarters to assist with more complex UI claimant issues. Updated training on UI/BEACON services will be arranged by the LEA and DOL Participants are encouraged to access all resources available through the AJCs. Title I staff provide an overview of services offered available through the Title I program and how to access them.

During the COVID-19 state of emergency Title I staff have provided UI customer supports through managing customer calls, providing hands-on customer computer assistance and enrollment in BEACON and assisting customers with basic career services at the AJC.

The AJC reopened on July 27,2020 by "appointment only" for customers needing access and connectivity to technology.

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

The comprehensive Carroll AJC provides Wagner-Peyser, RESEA and ROW programs where customers are provided information and services to assist with reemployment. Claimants are provided Labor Market Information, Resume and Interviewing Assistance, Individual Employment Plans and are referred to Title I and Title II for aptitude and career assessments and training services, if appropriate. We use these workshops as a method of providing access to workforce development services, community resource information, partner information, employment activities in the area. Follow-up is conducted with all RESEA customers.

# Section 14 – Senior Community Service Employment Program Functions This Section should include –

(A) A list of Senior Community Service Employment Program (SCSEP) providers in the Local Area. Explain how SCSEP is administered in the Local Area, including grantee and subgrantee information, if applicable.

Senior Service America, Inc 8403 Colesville Road Suite 200 Silver Spring, MD 20910

For nearly 60 years, The Center for Workforce Inclusion (the Center), formerly Senior Service America, Inc, has been building pathways to employment for our low-income, older job seekers. The Center operates the Senior Community Service Employment Program. (SCSEP). SCSEP is a job training program for eligible 55 years and older Carroll County residents. Participants are paid minimum wage for 20 hours per week for community service work-based training at nonprofit or government host agencies. Participants also receive job search assistance to find a job off the program. SCSEP is operated under a USDOL grant and in cooperation with the Center for Workforce Inclusion. SCSEP is funded by a \$46.3 million grant from the U.S. Department of Labor. This funding provides 90% of the support for SCSEP with The Center providing 10% match or \$5 million. The SCSEP Program is an equal opportunity program. Auxiliary aids and services are available upon request to individuals with disabilities.

(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.

The Senior Community Service Employment Program (SCSEP) is not physically located in the American Job Centers in Carroll County. However, Carroll County has had a long-term relationship with the Center serving as a host to SCSEP participants where participants serve as representatives of the SCSEP program and provide services. AJC staff train SCSEP participants to provide assistance at the front desk and in the resource areas, as well as, supporting administrative tasks to free up Employment Consultants' time to provide staff-assisted services and training if necessary. SCSEP participants may also provide basic eligibility screening for ageeligible American Job Center customers who register for employment services. While a SCSEP participant is working part-time in the American Job Center, they have access to a full range of services offered, such as assistance in finding full-time employment, job readiness skills (resume and interviewing), and the use of labor market information. Additionally, the Center's SCSEP staff require all SCSEP participants to register at the AJC and refer our participants to the AJC for job search assistance and training classes as needed dependent upon the participants' respective Individual Employment Plans. When referred to SCSEP, the applicant meets with the employment specialist and is assisted with registering in Maryland Workforce Exchange. The employment specialist also explains the program and process of becoming a participant to the applicant. The employment specialist tries to ensure the best match for both participant and host agency.

# Section 15 – WIOA Section 188 and Equal Opportunity Functions

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

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

This Section should include –

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

Heather Powell, BERC Manager
Carroll County Business/Employment Resource Center
224 N. Center St., Westminster, MD 21157
<a href="mailto:hpowell@carrollcountymd.gov">hpowell@carrollcountymd.gov</a>
410-386-2820

Maryland Relay 7-1-1
(The Local Board will review this designation in year one of the plan.)

(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 Carroll Workforce Board, WIOA partners and the One Stop Operator are committed to inclusion of all community members to the access of the AJC and WIOA programs regardless of disability and Limited English Proficiency. Language line phone and video services as well as in-person interpreter are available for customers with limited English Proficiency.

The AJC is located in a Carroll County Government facility and is compliant with the provisions of the ADA. The AJC is monitored annually for Section 188 for compliance by the One Stop Operator. Our DORS partner provides technical assistance for the AJC and its members. The AJC has accessible technology available to assist customers.

As the local area is committed to training, the EO officer attended the Virginia Employment Commission's Equal Opportunity Training in October 2019. The training of a broad overview of disability specific accommodations, the provision and implementation of WIOA Section 188 and a thorough review of the compliant and investigation process.

Staff participate in disability awareness and accommodation training. Our DORS partner provides technical assistance and training updates to all partners as requested.

- (C) An acknowledgment that the Local Board understands that, while Section 188 of WIOA and 29 CFR Part 38 ensure equal opportunity for individuals with disabilities, sub-recipients may also be subject to the requirements of:
  - Section 504 of the Rehabilitation Act, which prohibits discrimination against individuals with disabilities by recipients of Federal financial assistance;
  - Title I of the ADA, which prohibits discrimination in employment based on disability;
  - Title II of the ADA, which prohibits State and local governments from discriminating on the basis of disability;
  - Section 427 of the General Education Provisions Act; and
  - Maryland Anti-Discrimination laws, including 5 Md. STATE GOVERNMENT Code Ann. §10-1101, which stipulates that oral language services must be delivered on-site for those in frequent contact with a service provider.

The Local Board understands that, while Section 188 of WIOA and 29 CFR Part 38 ensure equal opportunity for individuals with disabilities, sub-recipients may also be subject to the requirements of: Section 504 of the Rehabilitation Act, which prohibits discrimination against individuals with disabilities by recipients of Federal financial assistance; Title I of the ADA, which prohibits discrimination in employment based on disability; Title II of the ADA, which prohibits State and local governments from discriminating on the basis of disability; Section 427 of the General Education Provisions Act; and Maryland Anti-Discrimination laws, including 5 Md. STATE GOVERNMENT Code Ann. §10-1101, which stipulates that oral language services must be delivered on-site for those in frequent contact with a service provider.

(D) A description of how the Local Board will ensure meaningful access<sup>5</sup> to all customers.

The Local Board will ensure meaningful access to all customers. Customers with Limited English Proficiency (LEP) may gain timely access to AJC services and WIOA partners services via interpreter services such as Language Line, interpreter agencies, qualified staff members or community partners and other acceptable services. (Professional services must be vetted and approved by the State of Maryland or Carroll County Government) These services are provided at no cost to the customer.

AJC staff are aware of all available access points for supportive services. Staff receive training on assistive technology; disability awareness and courteous customer service; and provision of accommodations in a manner consistent to all customers.

- (E) A description of the Local Board's procedures for handling grievances and complaints from participants and other interested parties affected by the local AJC system, including partners and service providers. Federal 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;

Any person who believes that he or she has been or is being subjected to discrimination based on the ground of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for

<sup>&</sup>lt;sup>5</sup> The Equal Employment Opportunity Commission provides an example of "meaningful access" as it relates to language access for individuals with Limited English Proficiency as "Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior compared to programs or services provided to English proficient individuals," available at: <a href="https://www.eeoc.gov/eeoc/plan/lap.cfm">https://www.eeoc.gov/eeoc/plan/lap.cfm</a>.

beneficiaries only, citizenship or participation in any WIOA Title 1 program or activity, may file a complaint. These persons include but are not limited to program applicants, registrants, participants, service providers, contractors, labor unions, community-based organizations, employees, and applicants for employment may file a complaint, either individual or through and authorized representative.

- a. Recipient Discrimination complaints must be filed within 180 days of the alleged discrimination.
- **b.** Each complaint must be filed in writing and contain the following information:
  - o Complainant's name and address, or alternate means of contact
  - o Identity of the individual or entity that the complainant alleges is responsible for the discrimination
  - o Description of the complainant's allegations, including enough detail to determine if the CRC or Recipient has jurisdiction over the complaint, the complaint was filed in time and that the complaint has apparent merit
  - o Complaint's signature or the signature of the complainant's authorized representative
- **c.** Complaints may be filed by completing and submitting CRC's Complaint information and Privacy Act Consent Form.
- **d.** Both the complainant and the respondent have the right to be represented by an attorney or other representative.
- **e.** If a complaint filed with the Carroll WIOA EO Officer is determined not to be under the local area's jurisdiction, the EO Office will immediately notify the complainant, in writing, providing a statement of the reason for that determination, notice that the complainant has a right to file a complaint with CRC within 30 days of the date on which the complainant received this notice.

All complaints must be made in writing and be directed to Carroll Equal Opportunity Officer, BERC, 224 N. Center Street, Westminster, MD 21157; or directly to the Director, Civil Rights Center (CRC) U.S. Department of Labor, 200 Constitution Avenue, NW, Room N-4123, Washington, DC 20210.

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

All nondiscrimination complaints (complaints not based on claims of discrimination) must be made in writing to the BERC Manager within 60 days of the date of the alleged incident.

Information postings regarding Maryland Labor Law are accessible to customers. These contain information pertaining to Minimum Wage, Fair Employment, Child Labor, Health Insurance, Unemployment Insurance, Equal Pay for Equal Work, Workers Compensation, MD Occupational Safety & Health (MOSH) Program and Wage Payment and Collection. Contact information is included on these postings. We also refer customers to the DOL website for further information and reference.

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

Remedies for violation of any requirement may include:

- Suspension or termination of payments to a program participant or vendor under WIOA Title I.
- Suspension or termination of payments to or contract with an employer who has violated any requirement under WIOA Title I.

- Efforts toward reinstatement of an employee when applicable.
- Other equitable alternatives.

Individuals with disabilities, including those who are deaf or blind, may request auxiliary aids and services. Please contact the Americans with Disabilities Act Coordinator at 410-386-3800, 1-888-302-8978, MD Relay 7-1-1/1-800-735-2258 or email: <a href="mailto:ada@carrollcountymd.gov">ada@carrollcountymd.gov</a>.

The information above is a description of the Local Board's procedures for handling grievances and complaints from participants and other interested parties affected by the local American Job Center system.

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

We provide universal access and will provide reasonable accommodations to qualified individuals. We comply with Carroll County Government's Equal Employment Opportunity and ADA requirements. The County has a position dedicated to the coordination of the ADA and assistance with assuring compliance. AJC documentation includes a notice accessibility and contact information to request accommodations. Employees, customers and members of the public may request reasonable accommodation from the AJC's EO officer, or any AJC staff member.

Carroll written materials contain the following statement:

**Equal Opportunity Program:** As an equal opportunity program; discrimination in WIOA Title I financially assisted programs or activities is prohibited by federal law and by Carroll County Government. Auxiliary aids and services are available upon request to individuals with disabilities. For accommodations please contact the Americans with Disabilities Act Coordinator at 410-386-3800, 1-888-302-8978, MD Relay 7-1-1/1-800-735-2258 or email: <a href="mailto:ada@carrollcountymd.gov">ada@carrollcountymd.gov</a>.

Carroll Workforce Board assures that we will provide reasonable accommodations to qualified individuals with disabilities unless providing the accommodation would cause undue hardship.

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

Carroll Workforce Board assures that we will provide universal access and reasonable accommodations to qualified individuals with disabilities with regard to aid, benefits, services, training and employment unless providing the accommodation would cause undue hardship. We comply with the State of Maryland and County Government Equal Employment Opportunity and ADA requirements. The AJC documentation has a notice of accessibility on it and the information for whom to contact to arrange accommodations. See Section15 (I) for ADA tagline

(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.

WIOA partners will work with the One Stop Operator to review and update existing policy and procedures related to ADA accommodations carried over from Mid-Maryland workforce area.

CWDA policy will be in place on or before October 31, 2021. The OSO will work with partners to include ADA and disability training in the annual training plan. Guidance from DORS partners, the OSO and local disability providers will provide training assistance.

(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.

Local policies will be reviewed and updated to ensure compliance and accessibility for the Carroll Workforce Development Area. Current policies and procedures address variety of communication accommodations available for individuals with disabilities including visual and hearing impairments. Accommodation aides may include Maryland Relay Services, TTY, interpreter services (sign and language), adaptive technology (iPad, adaptive software, etc.), accessible workstations, low tech accommodations and written materials.

The ADA tagline is on outreach material and forms. We use the Universal language poster at the front desk to identify which language a customer may be speaking. Language line is available and can be used with little or no advance notice. The process to provide in-person foreign language interpreting via DOL partners or County ADA coordinator.

#### ADA Tagline:

Equal Opportunity Program: As an equal opportunity program; discrimination, in WIOA Title I financially assisted programs or activities is prohibited by federal law and by Carroll County Government. Auxiliary aids and services are available upon request to individuals with disabilities. For accommodations, contact the Department of Citizen Services at 410.386.3600, 1.888.302.8978, MD Relay 7-1-1/1.800.735.2258, email: <a href="mailto:ada@carrollcountymd.gov">ada@carrollcountymd.gov</a> as soon as possible but no later than 72 hours before the scheduled event. The Personally Identifiable Information (PII) collected will be used as required by the Workforce Innovation and Opportunity Act, US Department of Labor, State of Maryland, and Carroll County Governments and will comply with the Privacy Act of 1974. The collection and use of all personal information is guided by strict standards of confidentiality.

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

There are signs posted in the Resource Center that language assistance is available for non-English speakers. The AJC front desk/resource center will use the Language Identification Card to help identify the language the individual speaks. We use Language Line which is a phone and video interpretations service, as appropriate. We will also provide in-person interpreter service. We follow county-specific policies related to translation and interpretation.

## Section 16- Fiscal, Performance, and Other Functions

This Section should include –

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

The responsibility for the disbursal of grant funds, as determined by the chief elected officials, Carroll County Board of Commissioners, rests with the Carroll County Business/Employment Resource Center.

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

The Carroll AJC in Mid-Maryland WDA has been financially stable based on current funding levels and the current resource sharing agreements. As funding allocations are redetermined due to the separation of Mid-Maryland into two independent workforce areas, we will examine all options, evaluate impact, and adjust our budget to maintain financial sustainability while remaining responsive to local workforce development needs. Carroll Workforce will seek the Technical Assistance (TA) provided by the DOL during this transition and may address a hold harmless provision as advised by MD Labor for the newly independent WDA.

(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.

We will use our local government procurement processes to award competitive subgrants and contracts. Carroll County government's Purchasing office has procedures in place to award competitively bid contracts. Award threshold is as follows:

\$25,000 and above – a formal competitive process is used through either a Competitive Sealed Bidding or a Competitive Sealed Proposal. Purchases under \$25,000 but over \$2,500 must receive no less than three businesses solicited to submit quotations. Purchases under \$2,500 are conducted under the discretion of the BERC Manager and Fiscal Manager. For the Invitation for Bids process, award is made to the lowest responsive and responsible bidder meeting the minimum qualifications, Vendors that are contracted by CCG and BERC must provide a Certificate of Insurance and sign an agreement that states they can perform the work. The vendor is researched on the Maryland State Debarment list, the Maryland Department of Assessment and Taxation and the Carroll County Collections Office for good standing status. References are also checked.

(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 American Job Center(s) and the One-Stop Operator.

Carroll subscribes to a demand-driven philosophy to support the labor market. The core partners participate on the board as well as labor representatives, CBOs, and businesses. Mid-Maryland's board is representative of the Area's industry composition. The Board meets regularly and is committed to continuing to focus on key areas such as business needs, workforce system effectiveness, youth and customer services to remain a high performing board. Board members are active in a variety of service organizations and boards which allows for increased knowledge and a broad reach in the community. We evaluate the skills required in our region through conversation with business and reviewing LMI.

At the WDB meeting, the Mid-Maryland board reviews the quarterly performance reports, provides feedback and understands the impact of performance. We concur with the Governor's goal that the workforce system must serve the person rather than focus on performance measures only. In keeping with the Governor's philosophy, we discuss customer satisfaction surveys for businesses and job seekers and respond with solutions to areas needing improvement. Carroll continues to utilize the strategic goals identified in the State's **Benchmarks of Success** as our foundation for customer services. We believe that collaborating with our customers and meeting their needs has resulted in positive performance.

WDB members participate in the development of policies. The WDB have active participants and that work to expand and increase the levels of partnerships. The Board naturally communicates and develops partnerships between business, labor, education and workforce entities.

The WDB provides oversight and guidance for the workforce system. The board authorizes the Workforce Development Area Manager or designee to handle day-to-day operations and make operational decisions and adjustments as necessary.

(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.

Carroll County will continue to support WIOA participants training through Individual Training Accounts (ITA) in accordance with the law and applicable local policies. There is no sequence of service requirement for "career services" and training. WIOA participants who seek training services:

- Must be unlikely or unable to obtain or retain employment with current skills, that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment;
- Is in need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
- Has the skills and qualifications to successfully participate in the selected program of training services.

After assessment, consultation and guidance with WIOA staff, and substantiation of labor market information and labor demand, participants and staff together will determine the need for an ITA. The training emphasis will be in response to local/regional labor market needs, specifically in growth, in-demand and priority industries and occupations. In consultation with WIOA staff, participants may select a training vendor from the list of approved providers on the statewide WIOA Eligible Training Provider List (ETPL). ITAs are the primary method to be used for procuring training services under WIOA. Standard exceptions to using a provider on the ETPL are listed below:

- On-the-job training, registered apprenticeship program, customized training, incumbent worker training, transitional jobs and internships and work experience;
- There are insufficient providers;
- There is a training services program with demonstrated effectiveness offered in the local area by a community-based organization or other private organization to serve individuals with barriers to employment (the Board or Board's designee will develop criteria to determine effectiveness)
- It would be most appropriate to award a contract to an institution of higher education or other eligible provider of training services in order to facilitate the training of multiple individuals in indemand industry sectors or occupations, and such contract does not limit customer choice.
- Additionally, we may determine that providing training through a combination of ITAs and contracts is the most effective approach.

• If an individual has been offered employment contingent upon obtaining a skill or specific training Carroll will support the training, even if it is not on the ETPL or is not a priority industry).

ITA limits on duration and value are established based on the participant's needs and circumstances, funding availability and allocations and local labor market demand. Adjustments may be made after submission of quarterly reports. Ceiling values are based on current obligations, expenditures, accruals, and balances. Carroll conducts an on-going assessment in terms of balance of funds and anticipated numbers to be served. Leveraging of funds with partner agencies is routinely used. Unique funding requests may be approved on a case-by-case basis when there is no anticipation of a future funding shortage. The amount of an ITA for youth is determined on a case-by-case basis. In Mid-Maryland, we support training that includes career pathways. Participants are required to acknowledge by signature that they have been notified of the requirement to apply for Pell Grants or other awards, as applicable. Management or designee must approve the ITA before it is submitted to the Fiscal Manager for availability of funds.

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

Training services will be made available to eligible customers in a manner that will ensure customer choice and is in alignment with demand occupations and industries. The customer may also benefit from training in partnerships with local employers or businesses. Included opportunities are On the Job training, Incumbent Worker training, Transitional Employment and Internships and Work Experience.

In certain circumstances a contract for training services or classroom-sized training may be developed. For example, if employers are in need of specific skills, then contract or class-sized training may be timelier and more cost effective. Or if there is a shortage of training available, within a reasonable timeframe, then contract or class-sized training may be used to support the local and regional economies. Additionally, if it is more effective to train a group rather than individuals then we may use contract training. Carroll would develop the contract with the training provider for group training. There may be situations where an employer may be included in an agreement. For example, in an OJT in conjunction with classroom training the training provider and business hosting the OJT may be included in an agreement. While not traditionally utilizing customized training, BERC will reserve the option to support business. There are established ITA and OJT guidelines and policies outlining the process and minimum requirements.

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

The Maryland Workforce Exchange (MWE) is used as the primary tool by Title I and Wagner Peyser staff to provide and track services to job seekers and businesses.

Job seekers register in MWE and are encouraged to complete the online resume. Job seekers receive training in the use of MWE in an individual or group format and staff assistance is available if needed. Job seekers use the MWE to search and apply for available positions, labor market information, education and training, and career and workforce information. Job Seekers, eligible for Unemployment, utilize MWE to record required job search contacts to continue receiving their UI benefits. Businesses use MWE to post their jobs, search the resume database for qualified applicants and utilize labor market information tools.

Staff use MWE to assist job seekers with registration, manage eligibility documentation, identify PIRL, job search, career information, and labor market information. Staff complete the WIOA program enrollment applications, tracks services and documents program participation through case notes. MWE is utilized for customer follow-up. MWE is used to produce reports for staff and management to ensure quality and performance. Staff provide training on the use of MWE as a job search tool for partners and as a recruitment and labor market information tool for businesses.

LMI based on the Maryland Workforce Exchange is shared with partners. Partners will use the Maryland Workforce Exchange as a tool to assist job seekers and businesses. Partners have been granted MWE access to view pertinent information to assist their job-seeking customers to obtain employment. Currently, each partner has their own intake and case management information system they are required to use by their respective agencies. It is redundant and inefficient to expect the same information to be data entered into multiple systems. When a fully integrated system for intake and case management is available, the WDB will encourage the use of the Maryland Workforce Exchange as the primary system.

- (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. 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;

Mid-Maryland has a sub-recipient monitoring policy. While the Carroll WDA does not currently utilize subgrantees or contractors, we will follow the carryover policy established by Mid-Maryland WDA. CWDA will develop local policy on or before October 31, 2021. Oversight and monitoring of WIOA activities of subgrantees and contractors will be performed to determine compliance with regulations and WIOA rules. Staff will utilize Carroll County Government risk assessment as a monitoring tool. Standard risk factors include but are not limited to grantee history of grant management, financial stability, performance, nondiscrimination of services, lack of staff training, and independent audit findings. Program and/or fiscal staff will provide oversight and/or actual monitoring. For example, program monitoring may include client eligibility, eligibility of services, and compliance with client documentation requirements. The Fiscal monitoring may include financial documentation standards, systems of internal controls, allowable costs, adequacy of financial reporting and records retention.

- A requirement that all subgrantee agreements and contracts be monitored at least annually; As notated in section 10 (c), Carroll WDA follows a monitoring process in compliance with the Subrecipient policy. Monitoring is required 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; Carroll WIOA (WDA) incorporates the Cost Allocation Plan and determination of allowable versus non-allowable costs into the monitoring process. In addition to the annual monitoring process, the expenditures are tracked as invoices are submitted for reimbursement. Managers review the invoices to ensure accuracy, validity, completeness, and eligibility of costs.
- 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;

BERC staff will communicate regularly with subgrantees and contractors. As part of the Cost Allocation Plan, Carroll WIOA (WDA) reviews updates to regulations and makes adjustments as

necessary. Notification of updates may come from multiple sources, including but not limited to; fiscal and MWA meetings, communication from MD Labor, and communication from the OMB. Compliance will be measured against the procured contract, agency and County policies and procedures. Depending on need, the Local Board may use a combination of desk review and on-site monitoring.

• 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;

Findings are recorded on the monitoring instruments. All findings will be communicated to the subgrantee and contractor for review and response. A fiscal and programmatic report will be issued within thirty (30) days of the completion of the review and includes the following: background, results of the review, findings, corrective action if required and summary. The review is complete if no corrective action is required.

A corrective action plan shall be documented by identifying the finding(s) and the action that the entity will initiate to correct the problem and the time frame in which the problem will be resolved. In the event it is not possible to resolve, the finding(s) will stand and be recorded in the report as unresolved. Technical assistance will/may be provided to ensure the finding(s) do not continue.

Provisions of technical assistance as necessary and appropriate

Technical assistance shall be provided as needed. Specific findings and issues shall be addressed using relevant federal regulations, state and local policies. Policies used shall include Case Management and Monitoring policies.

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

The following polices have been developed for the oversight of the American Job Center system.

Client Records Management Priority for Adult Funds Supportive Services Policy Incumbent Worker Policy Veterans Services Policy Transitional Jobs OJT

In areas where the Board does not have an existing policy Carroll County uses the MD Labor Policy Issuance.

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

Carroll WDA follows the Division of Workforce Development and Adult Learning's (DWDAL) privacy policy. DWDAL's policy on privacy can be found here: <a href="https://www.labor.maryland.gov/employment/mpi/mpi4-19.pdf">https://www.labor.maryland.gov/employment/mpi/mpi4-19.pdf</a> All PII is kept in locked filing cabinets or other locked areas and accessible only to staff needing such information. Electronic files are only maintained in the Maryland Workforce Exchange.

Any breaches are subject to notification requirements, both for physical and electronic data. Upon suspicion that a breach has occurred, the individual that discovered the possible breach must immediately notify their supervisor. Notification of organizations and individuals will be consistent with MD Labor policy issuance 4-19 reporting schedule. The table below outlines which entities need to be notified, by type of program, in the event of a breach. Notification of the following programs will occur in 24 hours or the next business day:

### Workforce Program

- For WIOA Title I, Local Area Manager
- For WIOA Title III, Labor Exchange Administrator;
- MD Labor DWDAL Manager of Monitoring and Compliance;
- MD Labor DWDAL Director of Office of Workforce Information and Performance, where applicable; and
- Affected customers/employees.
- MD Labor Director of Workforce Development
- GWDB Executive Director
- Carroll County Government

The notifications/incident response should contain the following elements:

- A brief description of what happened, including the date(s) of the breach and of its discovery.
- To the extent possible, a description of the types of PII and/or sensitive information involved in the breach (e.g., full name, social security number, date of birth, home address, account number, disability code, etc.)
- What the agency is doing, if anything, to investigate the breach, to mitigate losses, and to protect against any further breaches.
- Contact information for the organization experiencing the breach; and
- For notifications to the affected customers and/or employees, the steps that affected individuals and/or employees should take to protect themselves from potential harm.

#### Corrective Action Plan

- Carroll WDA will complete an incident report and corrective action as indicated in MD Labor Policy Issuance 2019-04. In addition to the above Carroll County will notify appropriate individuals and departments depending on the nature of the breach.
- (J) A description of the Local Board's procurement system, including a statement of assurance that the procedures conform to the standards in USDOL regulations set forth in 29 CFR Part 95, Part 97 and 2 CFR 200. Note that this should include details on how the Local Board would award emergency contracts when current contracts have been eliminated for just cause, in accordance with the Local Board's procurement system.

The Carroll Workforce Development Area follows County Government's procurement systems. CWDA assures that its procedures conform with the standards and regulations found in 2 CFR 200 Uniform Administrative Requirements COST Principles, And Audit Requirements for Federal Awards. If instances exist where there is a difference between County and federal procurement guidelines, then the more stringent guidelines will be followed. Below are links to Carroll County Government's Purchasing manual.

https://www.carrollcountymd.gov/media/2601/purchasing-procedures-10-16-20.pdf

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.

We follow our local government's acquisition, management and property disposition policies and procedures and adhere to DOL regulations set forth in 2 CFR Part 200. The specifics are spelled out in the Carroll County Maryland Capital Asset and Surplus Property Procedural Manual.

If instances exist where there is a difference between County and federal procurement guidelines, then the more stringent guidelines will be followed. Below is the link for Carroll County Purchasing. https://www.carrollcountymd.gov/government/directory/comptroller/purchasing/

(K)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.

Carroll Workforce Development Board has a conflict of interest policy that each board member must sign. It includes conflicts related to the awarding of contracts.

- (L) 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 Accounting procedures for Carroll County are prepared in accordance with Generally Accepted Accounting Principles (GAAP). Through a combination of specially designed Excel worksheets, and the Carroll County FMS system, control of obligations and expenditures is maintained. The County financial system records the amount of funds available for each grant, the amount of expenditures, and the current balance. Carroll County's accounting system utilizes a Microsoft Excel based format for tracking and compiling all financial information of the Local WIOA offices. The information will be used to generate Requisitions for Cash, Quarterly Status Reports, Final Closeout Reports, and any other ad hoc reports as needed by the Manager and the WDB.

On a monthly basis, the BERC Fiscal Manager reviews and reconciles all transactions with the Carroll County FMS system and the CCG Comptroller Department. After all transactions have been reviewed and adjusted for any corrections (through journal entries), the BERC Fiscal Manager will begin report preparation.

The Carroll County Government provides space for the One Stop Center and its activities at no cost to the WIOA Title 1. However, a monthly accounting of this value is included in the QSRs.

- (M) An identification of key staff who will be working with WIOA funds.
  - Carroll County BERC: Christine Cruz, Fiscal Manager
  - Heather Lee Powell, Manager, Business/ Employment Resource Center

# (N) 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.

A detailed Cost Allocation Plan (CAP) is used detailing allowable and non-allowable costs as well as appropriate categorization of costs. Carroll County also maintains detailed procedures for all fiscal aspects regarding WIOA funds. Included in the procedures is the process for documentation and tracking of the completeness, accuracy and validity of all training vouchers issued, allocation of salary expenses as well as approval process. This system of internal controls verifies that all training expenditures are issued and paid only for clients and training. All expenditures are reconciled on a monthly basis.

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

#### • Fiscal reporting system,

CWDA fiscal reporting system uses Microsoft Excel, and Carroll County's FMS Financial System.

#### • Obligation control system,

Obligation control system consists of one Microsoft Excel Master Control Log per Fiscal Year that continuously tracks training vouchers and other obligations. Data fields within this system include voucher control number, date of issuance, training institution, client name, category of training, funding stream, dates of training, counselor initials and dollar amount of training. Carroll County also uses specially designed Excel spreadsheets to maintain obligations monthly against available grant funds.

#### ITA payment system,

Documented procedures exist for all steps within the payment process. Briefly stated, the invoices that are received are compared against corresponding ITAs/vouchers that are issued and also against the Obligation Master Control Log as referenced above. Verification of the accuracy of client name, training name, dates of training, dollar amount of training and attendance of the customer is completed by the Fiscal Manager. Once verification is completed, payment process is begun. All payment requests are routed to management for approval before submitting to the CCG Accounts Payable department for processing. Processing of check disbursements and mailings are completed by the CCG Accounts Payable department.

#### • Chart of account system,

Mid Maryland utilizes the Chart of Account System as created and maintained by the County Finance Department.

#### • Accounts payable system,

The Carroll County Government Comptroller Office uses FMS financial systems.

# • Staff payroll system,

Carroll County Government Staff submit bi-weekly timesheets through VTI. The timesheets are approved by Management.

Staff time allocation is reconciled monthly to specific grant funding in accordance with the monthly Participant Indicators report showing time spent on the grant activity in the respective funding stream. Manual timesheets translate the hours documented in VTI for each individual staff member to the appropriate funding stream in accordance with the monthly Participant Indicator report. These manual timesheets are also approved by Management.

All payroll for the County is processed by the County's Centralized Payroll Department for payment and payroll tax reporting.

## • Participant payroll system, and

Participant payroll system is the same as the staff payroll system.

## • Participant stipend payment system.

Carroll does not use a participant stipend payment system at this time.

# (P) 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.

Carroll County does not maintain physical custody of cash assets other than a \$50 petty cash fund that is reconciled with the County Government. There is not a physical custody of check stock. All cash deposit, disbursements and reconciliation of the bank reconciliation activities are maintained within the appropriate County Department in accordance with proper segregation of duties' controls.

Carroll WIOA operates on a reimbursement basis. The Area's cash requisitions are based on reimbursement for actual expenditures already incurred.

Upon receipt of the revenues (reimbursed expenditures), the BERC Fiscal manager provides the Collections office with the deposit information, to include the appropriate grant project and object codes, a description of the deposit and the amount. The Collections office deposits the check. The fiscal manager reconciles funds received to the requisitions submitted.

### (Q)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 American Job Centers.

#### Carroll WIOA follows the below Cost Allocation Plan Procedures:

#### **Carroll functions and related benefit:**

Function	Benefit
Participant Intake, eligibility	Program
Participant meeting, skills assessment, training program development	Program
Counselor training	Program
Participant resume review, mock interview	Program
Customer data management activities	Program

Business services	Program
Job Fair	Program
Membership Dues	Program/Administrative
Staff meetings	Program
Fiscal reporting and funds management	Administrative
Training workshops	Program
Work experience coordination and oversight	Program
Workforce Investment Board Meetings	Program/Administrative
Timekeeping	Program/Administrative

For the purposes of the above chart, program is defined as active funding streams, mainly WIOA, but may be discretionary or other grants as well. Staff salary distribution via timesheet documentation is the basis for allocation.

#### **Determination of Allowable vs Unallowable costs:**

OMB Super Circular Title 2 CFR 200.403 sets forth the following language in determining the validity of an allowable cost:

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:

- a. Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
- b. Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
- c. Be consistent with policies and procedures that apply uniformly to both federally financed and other activities of the non-Federal entity.
- d. Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- e. Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part.
- f. Not be included as a cost or used to meet cost sharing or matching requirements of any other federally financed program in either the current or a prior period. See also § 200.306 Cost sharing or matching paragraph (b).
- g. Be adequately documented. See also §§ 200.300 Statutory and national policy requirements through 200.309 Period of performance of this part.

WIOA Law Appendix IV Part 200 provides regulatory guidance for allowable versus unallowable costs. The costs considered allowable for Carroll are:

- 1) Salaries
- 2) Fringe
- 3) Benefits (health insurance, retirement)
- 4) Training for participants
- 5) Participant Supportive Services
- 6) Equipment
- 7) Supplies and operating expenses
- 8) Mileage/Travel/Staff Training Costs
- 9) Contractual Fees
- 10) Indirect Costs

Costs beyond the categories listed above are discussed with the BERC/WIOA manager, or Fiscal Manager prior to incurrence to determine whether the cost is considered allowable or unallowable under WIOA law.

#### **Direct Cost Plan:**

For those activities where the cost can be directly related to a specific area of benefit, 100% of the cost is charged to the area of benefit. Staff salary distribution as documented by employee timesheets is the basis for allocation for direct costs for those employees whose work benefits multiple funding sources. Examples of direct costs:

- 1) Salaries
- 2) Fringe/Benefits
- 3) Training for participants
- 4) Supportive Services
- 5) Mileage/Travel/Staff Training
- 6) Supplies
- 7) Contractual Fees

#### **Indirect Cost Plan:**

The basis for allocation for indirect costs for Carroll is the De Minimus Rate of 10% based on the Modified Total Direct Costs.

Indirect costs allocated to BERC from the County Government include costs associated with carrying out administrative and general management functions such as Accounting, Budgeting, Payroll, Procurement, Facilities, Property Management Insurance Human Resources, Audit, Incident Reports, etc.

#### **Allocation Basis: Staff Salary Allocation:**

BERC utilizes an Excel based spreadsheet for the allocation of costs to the benefiting cost objectives. BERC does not base allocations on projections, funding amount or budgetary data. All allocations are performed using the basis of staff time allocation associated with the Participant Indicator report. Actual time worked as reported on the employee timesheet approved by supervisor is used as the source documentation for salary. Administrative/Other amounts charged are re-allocated based on the percentages from the Participant Indicator report. Amounts are calculated by employee based on their individual pay information. This methodology is utilized for all salary and fringe related expenses. This is also used for those costs that are not specific to one program, such as office supplies. Staff costs benefiting multiple programs at the AJC are allocated based on customer counts from the Participant Indicator report run in the MWE which provides data regarding the number of participants served by the Center under the various funding streams.

#### **American Job Center Costs:**

American Job Center related costs are identified on the Resource Sharing Agreement and agreed upon by the partners.

## **Reconciliation and Adjustment:**

On a monthly basis, the Fiscal Manager reviews all expenses recorded to the funding streams for validity, completeness and accuracy of costs deemed as allowable. The costs allocated to the grant funding streams are included in this review and analysis. If allowable administrative costs have been allocated to the grant in excess of limits set by the Grantor (for example, 10% cap for administrative costs) these amounts are reconciled and moved out of the funding stream to be charged against the BERC County funding.

#### Validation and Updates:

This Cost Allocation Plan is reviewed at least annually by the Fiscal Manager and the Manager of the Carroll Workforce Area. The basis of allocation is reviewed for verification that the operations have remained consistent and continue to be the most reasonable basis for calculation and distribution of expenses. This review is evidenced by the signature of the Manager of Carroll Workforce Area on the Certificate of Cost Allocation Plan.

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

Carroll County operates on cost reimbursement basis only. If overpayment is made to a vendor, the discrepancy is identified, and the vendor is notified of the overpayment both verbally and/or in writing. The vendor issues a manual check made payable to the County. The collection is recorded to the appropriate grant fund for credit by the local WIOA fiscal staff. The County's Finance office deposits the check according to the appropriate grant fund and object code. Any Over or Under payment of salaries or fringe would result in the adjustment in the next pay period on the employee's payroll check.

Debt collection for late or unresponsive vendor debts are referred to Carroll County Government Department of County Attorney.

# 2020-2024 Local Plan Assurances

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

		Assurance
X	1.	Consistent with WIOA Section 108(d), for the 2020-2024 Plan, the Local Board has held at least one public comment period of no less than 30 days to obtain input into the development of the Local Plan and to provide the opportunity for comment by representative of business, labor organizations, education, other key stakeholders, and the general public.
x	2.	The final Local Plan is available and accessible to the general public.
x	3.	The Local Board has established procedures to ensure public access (including people with disabilities) to board meetings and information regarding board activities, such as board membership and minutes.
х	4.	The Local Board makes publicly available any local requirements for the Local Area, such as policies, including policies for the use of WIOA Title I funds.
х	5.	The Local Board has established a written policy or procedure that identifies circumstances that might present conflict of interest for any local workforce investment board or entity that they represent and provides for the resolution of conflicts.
х	6.	The Local Board has copies of memoranda of understanding between the Local Board and each American Job Center partner concerning the operation of the American Job Center delivery system in the Local Area and has provided the State with the latest versions of its memoranda of understanding.
х	7.	The Local Board has written policy or procedures that ensure American Job Center operator agreements are reviewed and updated no less than once every three years.
х	8.	The Local Board has procurement policies and procedures for selecting One-Stop operators, awarding contracts under WIOA Title I Adult and Dislocated Worker funding provisions, and awarding contracts for Youth service provision under WIOA Title I in accordance with applicable state and local laws, rules, and regulations, provided no conflict exists with WIOA.
x	9.	The Local Board has procedures for identifying and determining the eligibility of training providers and their programs to receive WIOA Title I individual training accounts.
х	10.	The Local Board has written procedures for resolving grievances and complaints alleging violations of WIOA Title I regulations, grants, or other agreements under WIOA and written policies or procedures for assisting customers who express interest in filing complaints at any point of service, including, at a minimum, a requirement that all partners can identify appropriate staff contacts and refer customers to those contacts.

Х	11.	The Local Board has established at least one comprehensive, full-service American Job Center and has a written process for the local Chief Elected Official and Local Board to determine that the center conforms to the definition therein.
х	12.	All partners in the local workforce and education system described in this plan ensure the physical, programmatic and communications accessibility of facilities, programs, services, technology and materials in the Local Area's American Job Centers for individuals with disabilities.
х	13.	The Local Board ensures that outreach is provided to populations and sub-populations who can benefit from American Job Center services.
х	14.	The Local Board implements universal access to programs and activities to individuals through reasonable recruitment targeting, outreach efforts, assessments, service delivery, partner development, and numeric goals.
х	15.	The Local Board complies with the nondiscrimination provisions of Section 188 and assures that Methods of Administration were developed and implemented.
х	16.	The Local Board collects and maintains data necessary to show compliance with nondiscrimination provisions of Section 188 of WIOA.
х	17.	The Local Board complies with restrictions governing the use of federal funds for political activities, the use of the American Job Center environment for political activities, and the Local Board complies with the applicable certification and disclosure requirements.
х	18.	The Local Board ensures that American Job Center staff, along with the Migrant and Seasonal Farmworker program partner agency, will continue to provide services to agricultural employers and Migrant and Seasonal Farmworkers that are demand-driven and consistent with MD Labor policy.
х	19.	The Local Board follows confidentiality requirements for wage and education records including, but not limited to, 20 C. F. R. 603, the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended, WIOA, and applicable State laws, Departmental regulations and policies.
X	20.	The Local Board has a written policy and procedures to competitively award grants and contracts for WIOA Title I activities (or applicable federal waiver), including a process to be used to procure training services made as exceptions to the Individual Training Account process.
X	21.	The Local Board has accounting systems that follow current Generally Accepted Accounting Principles (GAAP) and written fiscal-controls and fund-accounting procedures and ensures such procedures are followed to insure proper disbursement and accounting of WIOA adult, dislocated worker, and youth program and the Wagner-Peyser Act funds.

х	22.	The Local Board ensures compliance with the uniform administrative requirements under WIOA through annual, on-site monitoring of each local sub-recipient.
х	23.	The Local Board has a written debt collection policy and procedures that conforms with state and federal requirements and a process for maintaining a permanent record of all debt collection cases that supports the decisions made and documents the actions taken with respect to debt collection, restoration, or other debt resolution activities.
Х	24.	The Local Board has a written policy and procedures for ensuring management and inventory of all properties obtained using WIOA funds, including property purchased with JTPA or WIA funds and transferred to WIOA, and that comply with WIOA, and, in the cases of local government, Local Government Property Acquisition policies.
х	25.	The Local Board will not use funds received under WIOA to assist, promote, or deter union organizing.
X	26.	The Local Board has a written policy and procedures that ensure adequate and correct determinations of eligibility for WIOA-funded basic career services and qualifications for enrollment of adults, dislocated workers, and youth in WIOA-funded individualized career services and training services, consistent with state policy on eligibility and priority of service.
х	27.	The Local Board has a written policy and procedures for awarding Individual Training Accounts to eligible adults, dislocated workers, and youth receiving WIOA Title I training services, including dollar and/or duration limit(s), limits on the number of times an individual may modify an ITA, and how ITAs will be obligated and authorized.
х	28.	The Local Board has a written policy and procedures that establish internal controls, documentation requirements, and leveraging and coordination of other community resources when providing supportive services and, as applicable, needs-related payments to eligible adult, dislocated workers, and youth enrolled in WIOA Title I programs.
х	29.	The Local Board has a written policy for priority of service at its American Job Centers and, as applicable, affiliate sites and for local workforce providers that ensures veterans and eligible spouses are identified at the point of entry, made aware of their entitlement to priority of service, and provided information on the array of employment, training and placement services and eligibility requirements for those programs or services.
х	30.	The Local Board has developed plans and strategies for maximizing coordination of services provided by the State employment service under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) and services provided in the Local Area through the American Job Center delivery system, to improve service delivery and avoid duplication of services.
х	31.	The Local Board will provide reasonable accommodation to qualified individuals with disabilities unless providing the accommodation would cause undue hardship.

The Local Workforce Development Board for Carroll County Workforce Area certifies that it complies with all required components and assurances of the Workforce Innovation and Opportunity Act plan development guidelines issued by the state of Maryland. The Local Board also assures that funds will be spent in accordance with the Workforce Innovation and Opportunity Act, Wagner-Peyser Act, and their regulations, written U.S. Department of Labor guidance implementing these laws, Office of Management and Budget circulars, and all other applicable federal and state laws, regulations, and policies.

Local Chief Elected Official

Edward Rothstein, Board President

12/2/2b21 Date

Local Workforce Development Board Chair

Zach Tomlin, CCWDB Chair

Date