

**Workforce Innovation and Opportunity Act (WIOA)  
Howard County Workforce Development Area  
2020-2024 Local Workforce Plan**



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## WIOA Plan Acronym Glossary

<b>Acronym</b>	<b>Definition</b>
<b>ABAWD</b>	Able-Bodied Adults Without Dependents
<b>ABE</b>	Adult Basic Education
<b>ACLS</b>	Advanced Cardiac Life Support Certification
<b>ADA</b>	American Disabilities Act
<b>AJC</b>	American Job Center
<b>APL</b>	Johns Hopkins Applied Physics Laboratory
<b>BERC</b>	Business & Employment Resource Center
<b>BLS</b>	Basic Life Support (BLS) Certification
<b>BMC</b>	Baltimore Metropolitan Council
<b>BRAC</b>	Base Realignment and Closure
<b>CAP</b>	Cost Allocation Plan
<b>CASAS</b>	Comprehensive Adult Student Assessment Systems
<b>CCC</b>	Carroll Community College
<b>CCNA</b>	Cisco Certified Network Associate
<b>CDL</b>	Commercial Driver's License
<b>CFR</b>	Code of Federal Regulations
<b>CISSP</b>	Certified Information Systems Security Professional
<b>CNA</b>	Certified Nursing Assistant (CNA)
<b>CRC</b>	Civil Rights Center
<b>CTE</b>	Career and Technology Education
<b>CTC</b>	Career and Technology Centers
<b>CWC</b>	Columbia Workforce Center
<b>DHS</b>	Department of Human Services
<b>DISA</b>	Defense Information Systems Agency
<b>DLLR</b>	Department of Labor Licensing and Regulation
<b>DOL</b>	Department of Labor
<b>DORS</b>	Division of Rehabilitation Services
<b>DSS</b>	Department of Social Services
<b>DVOP</b>	Disabled Veterans Outreach Program
<b>EARN</b>	Employment Advancement Right Now
<b>EDA</b>	Economic Development Authority
<b>EO</b>	Equal Opportunity

<b>ESL</b>	English Language Learner
<b>ETPL</b>	Eligible Training Provider List
<b>FERPA</b>	Federal Education Rights and Privacy Act
<b>FMS</b>	Financial Management System
<b>GAAP</b>	Generally Accepted Accounting Principles
<b>GED</b>	General Educational Diploma
<b>GIAC</b>	Global Information Assurance Certification
<b>HCC</b>	Howard Community College
<b>HSP</b>	Human Services Program
<b>ISS</b>	Individual Services Strategy
<b>ITA</b>	Individual Training Account
<b>ITIL</b>	Information Technology Infrastructure Library Certification
<b>LAUS</b>	Local Area Unemployment Statistics
<b>LDSS</b>	Local Department of Social Services
<b>LMI</b>	Labor Market Information
<b>LVER</b>	Local Veterans Employment Representative
<b>LWIOA</b>	Local Workforce Innovation and Opportunity Act
<b>MEP</b>	Manufacturing Extension Partnership
<b>MOSH</b>	Maryland Occupational Safety and Health
<b>MSFW</b>	Migrant Seasonal Farmworker Program
<b>MWE</b>	Maryland Workforce Exchange
<b>MWIN</b>	Maryland Workforce Investment Network
<b>NAMI</b>	National Alliance on Mental Illness
<b>NEDP</b>	National External Diploma Program
<b>NEG</b>	National Emergency Grant
<b>NESAP</b>	North East Social Action Program
<b>NSA</b>	National Security Agency
<b>OJT</b>	On the Job Training
<b>OMB</b>	Office of Management and Budget
<b>ONET</b>	Occupation Information Network
<b>PII</b>	Personally Identifiable Information
<b>POS</b>	Point of Service
<b>RESEA</b>	Re-Employment Services Assessment
<b>RFP</b>	Request for Proposal
<b>ROW</b>	Reemployment Opportunities Workshop
<b>SBDC</b>	Small Business Development Center

<b>SCORE</b>	Service Core of Retired Executives
<b>SNAP</b>	Supplemental Nutritional Assistance Program
<b>STEM</b>	Science, Technology, Engineering and Math
<b>TAA</b>	Trade Adjustment Assistance
<b>TABE</b>	Test of Adult Basic Education
<b>TANF</b>	Temporary Assistance for Needy Families
<b>TCA</b>	Temporary Cash Assistance
<b>TEGL</b>	Training and Employment Guidance Letters
<b>UCX</b>	Unemployment Compensation for Ex-Military members
<b>UI</b>	Unemployment Insurance
<b>US</b>	United States
<b>USDOL</b>	United States Department of Labor
<b>WARN</b>	Worker Adjustment and Retraining Notification
<b>WDA</b>	Workforce Development Area
<b>WDB</b>	Workforce Development Board
<b>WIA</b>	Workforce Investment Act
<b>WIB</b>	Workforce Investment Board
<b>WIOA</b>	Workforce Innovation and Opportunity Act
<b>WP</b>	Wagner-Peyser
<b>WPR</b>	Work Participation Rate

## **Introduction**

The Workforce Development Board collaborates with a wide variety of individuals, businesses and organizations. We view 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 businesses across Howard County and the region; our mission directly supports economic business growth.

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

Effective July 1, 2021 Howard County is an individual Workforce Development Area with its own Workforce Development Board. Prior to this, Howard County was part of the Mid-Maryland Workforce Development Area (Carroll and Howard Counties) and the counties shared the Mid-Maryland Workforce Development Board. During the transition to separate areas, the board has authorized each County to use Mid-Maryland policies, board mission/vision 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 local plan is a living document and changes as workforce needs are identified. We believe that it is important for us to respond to the needs of businesses and maintain and enhance the quality of life in Howard 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.

*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: <https://www.labor.maryland.gov/lmi/wiagrowthind/git.shtml>) and the Growth Occupation Tool (available at: <https://www.labor.maryland.gov/lmi/wiagrowthind/got.shtml>) as an aid to examining employment, growth, and employment concentration for the Local Area.*

Howard County commissioned two studies on the impact of the COVID-19 on the labor market and economy; one study by Sage Policy Research addressed the short-term impacts of COVID-19 and the other study addresses the impacts of the pandemic on the current and post-pandemic labor market.

The COVID-19 pandemic began in early 2020 and has been marked not only by an immense public health crisis but also by an economic crisis. Lockdowns and social distancing measures caused many individuals to lose their jobs and seek alternative employment. In the period from March to April of 2020, Howard County’s unemployment rate jumped from 2.9 to 8.1 percent, leaving 14,169 individuals without a job.

According to data from the U.S. Bureau of Labor Statistics, Howard County’s total nonfarm industries employed 151,178 individuals in Q2 2020, a 13.4 percent decrease from the year prior. This drop in employment was most concentrated throughout the Leisure and Hospitality supersector, which includes food, travel, lodging, arts, and entertainment industries, most of which inherently entail in-person interaction and are not telework-capable positions.

While Howard County’s unemployment rate has consistently remained below the Maryland average, the Howard County unemployment rate alone is somewhat misleading because it only applies to Howard County residents. Many of the Howard County workers, especially those within the Leisure and Hospitality supersector, who experienced layoffs likely live outside of Howard County. Consequently, as they are not reflected in the Howard County unemployment rate.

Despite experiencing a loss of over 22,000 jobs between 2020 Q1 and 2020 Q2, Howard County is expected to recover over 16,000 jobs in 2021 and fully recover by 2023. As Howard County recovers, there will likely be long-term (if not permanent) changes to the workplace and the nature of work itself—while some industries will rapidly recover and pass their pre-pandemic levels, others may not recover to their pre-pandemic levels for many years. For many professional industries that are telework-capable, working from home will become much more common even after the COVID-19 pandemic ends. This widespread, long-term shift to working from home will likely change other industries, particularly those which provide services to the employees who previously worked in major employment centers (e.g., offices, warehouses, etc.) five days a week.

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

Employment in the Leisure and Hospitality supersector had risen at a rate three times faster than the rest of the labor force for the past two decades. Many of the positions within this supersector that were lost may not return for many years, and the employees working within this supersector who experienced layoffs will likely need to transition to different occupational categories.

There are three industry sectors where Howard County has a distinct regional advantage, allowing them to maintain more jobs than national trends would predict throughout the pandemic. Moving forward, these are industries where HCOWD can work to recruit and expand countywide employment.

- Manufacturing;
- Wholesale Trade; and
- Professional, Scientific, and Technical Services.

Most occupational groups in Howard County experienced a decline in employment in 2020. However we expect that most occupational groups in the county will meet or exceed their 2019 employment levels by 2024, with a few exceptions. Healthcare Occupations as well as Computer, Mathematical, Architecture, and Engineering Occupations are expected to have rapid recoveries and return to 2019 employment levels by 2022. However, Sales and Related Office and Administrative Support Occupations are not expected to fully recover until 2024.

Based on a review of all available information and taking into consideration the impact of COVID-19, we have identified the key occupations for Howard County as:

1. Registered Nurses;
2. Nursing Assistants;
3. Medical Assistants;
4. Personal Care Aides;
5. Secretaries and Administrative Assistants;
6. General and Operations Managers;
7. Heavy and Tractor-Trailer Truck Drivers;
8. Light Truck Drivers;
9. Laborers and Freight, Stock, and Material Movers;
10. Computer Systems Analysts / Computer Support Specialists / Computer Programmers / Information Security; and
11. Software Developers: Applications and Systems.

There are numerous occupations that are in demand in Howard County and have minimal education requirements, including:

- Nursing Assistants;
- Medical Assistants;
- Personal Care Aides;
- Secretaries and Administrative Assistants;
- Heavy and Tractor Trailer Truck Drivers;
- Delivery Truck Drivers and Driver/Sales Workers; and
- Laborers and Freight, Stock, and Material Movers.

The following chart is a list of priority industries that HCOWD will focus on.

Emerging	Growth	In-Demand
Accommodation and Food Services	Management of companies and enterprises	Business Services (Professional, Managerial, Technical)
Finance and Insurance	Data Centers	Transportation & Logistics
Health care and social assistance	<i>E-commerce/delivery</i>	Construction/Trades
Other services, except public administration		IT/Cyber Security
		Manufacturing
		Healthcare
		Gaming
		Green Energy

Howard County has a strong Professional, Scientific, and Business Services industry as well as a strong Manufacturing industry. However, most of the jobs within Professional, Scientific, and Business Services are ones requiring formal education and experience. While it is important for HCOWD to work with employers in these fields to help them find qualified candidates, it is unlikely that low wage displaced workers can fill these roles. However, there may be opportunities for some of these displaced employees within Howard County’s Manufacturing industry.

Since employees who have only worked in lower-wage service sector positions may not have the skills necessary for digital success, classes designed to build skills relating to teleworking, online security & privacy, digital communication, and standard software usage can all be of great benefit moving forward. HCOWD will look to provide a certificate program in customer service for those who are seeking employment in retail, food service, hospitality, home health, and in other service- oriented categories, since many of the jobs to be created once the pandemic is past will be oriented toward customer service.

The average annual wage across the 15 industries in Howard County with the highest wages each averaged at least \$88,489 per year. Two industries represented 67.4 percent of all employees working within the top paying 15 industries. The Professional and Technical Services industry, which employed 31,047 workers, had an average wage of \$113,876 and the Merchant Wholesalers, Durable Goods Industry, which employed 6,784 workers, had an average wage of \$106,083. Combined the 15 industries with highest wages employed 54,836 workers and had an average annual wage of \$114,565 (weighted). More than half of these employees worked within the Professional and Technical Services Industry.

The charts on the following pages reflect the demographics in Howard County based on data obtained through the Maryland Workforce Exchange

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

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

- (A) Increase the earning capacity of Maryland’s workforce system customers by maximizing access to employment;

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

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

- (A) An analysis of the knowledge and skills needed to meet the needs of the businesses in the Local Area, including employment needs in in-demand industry sectors and occupations.<sup>3</sup>

An analysis of the workforce in the Local Area, including current labor force employment (and unemployment) data,<sup>4</sup> and information on labor market trends, and the educational and skill levels of the workforce in the Local Area,<sup>5</sup> including individuals with barriers to employment.

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

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

<sup>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: <https://www.labor.maryland.gov/lmi/laus/lauscounties.shtml> and [http://labor.maryland.gov/lmi/uicountyindustry/?fbclid=IwAR1thEMzRCUTMT0I-UODS4OZqbMH9MeDo\\_W-6CZxCf5e4LRw4sc\\_v6QMSr0](http://labor.maryland.gov/lmi/uicountyindustry/?fbclid=IwAR1thEMzRCUTMT0I-UODS4OZqbMH9MeDo_W-6CZxCf5e4LRw4sc_v6QMSr0).

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

## Area Profile for Howard County, MD

### Advertised Job Skills Table

The table below shows the top advertised detailed job skills found in job openings advertised online in Howard County, MD in December 2020.

7 of the top 10 advertised job skills in Howard County that are listed in the Maryland Workforce Exchange identify a need for “soft/essential skills” with customer service taking the top spot. Other top skills needed are in the Information Technology and Business Services industries

Rank	Advertised Detailed Job Skill	Advertised Skill Group	Job Opening Match Count
1	Customer service	Customer Service Skills	1,134
2	Problem solving	Basic Skills	742
3	Decision making	Basic Skills	711
4	System design	Information Systems Manager Skills	631
5	Interpersonal skills	Interpersonal Skills	497
6	Software design	Software Engineer Skills	449
7	Must be flexible	Basic Skills	446
8	Work independently	Basic Skills	425
9	Risk management	Risk Analyst Skills	424
10	Self-motivated	Basic Skills	421

Source: Online advertised jobs data  
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## Advertised Job Certifications Table

The table below shows the top advertised certification groups found in job openings advertised online in Howard County, MD in December 2020.

Information Technology and Cyber Security are the most often requested tools and technology needs listed in the Maryland Workforce Exchange for Howard County job postings. Healthcare continues to be a mainstay with the need of CPR and Nursing Certificates ranking 1st and 3rd respectively.

Rank	Advertised Certification Group	Advertised Certification Sub-Category	Job Opening Match Count
1	American Heart Association (AHA) CPR & First Aid Certifications	Nursing	841
2	(ISC) <sup>2</sup> Certifications	Information and Cyber Security	495
3	Nursing Credentials and Certifications	Nursing	489
4	Cisco Associate Certifications	Computer Network	364
5	GIAC Security Certifications - Cyber Defense	Information and Cyber Security	222
6	CompTIA Certifications	Information Technology - All Other	202
7	Cisco Professional Certifications	Computer Network	129
8	Schneider Electric Certifications	Engineering	120
9	Information Systems Audit and Control Association (ISACA)	Information and Cyber Security	117
10	GIAC Security Certifications - Penetration Testing	Information and Cyber Security	101

Source: Online advertised jobs data  
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## Employers by Number of Job Openings Table

The table below shows the employers with the highest number of job openings and green jobs advertised online in Howard County, MD on January 27, 2021.

Howard County’s emerging and growth industries are reflected in Table above; Science Research, healthcare, defense contractors and Information Technology currently offer the most job openings. Results are based on information entered by each organization.

Rank	Employer Name	Job Openings	Green Job Count
1	The Johns Hopkins University Applied Physics Laboratory	466	270
2	Johns Hopkins Health System	262	262
3	Novetta Solutions	195	100
4	Howard Community College	191	167
5	Level One Personnel	118	118
6	Booz Allen Hamilton INC.	94	94
7	Data Computer Corporation of America (DCCA)	68	68
8	Alion Science & Technology	44	44
9	MOSAIC Technologies Group, Inc.	44	41
10	Planned Systems International, Inc.	42	42

Source: Online advertised jobs data  
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## Advertised Tools and Technology Table

The table below shows the top advertised detailed tools and technologies found in job openings advertised online in Howard County, MD in December 2020.

Information Technology tools and technology continue to be the prevailing need in Howard County. Employers are always seeking candidates with knowledge of various software applications.

Rank	Advertised Detailed Tool or Technology	Advertised Tool and Technology Group	Job Opening Match Count
1	Linux software	Operating System Software	1,527
2	Python	Object or Component Oriented Development Software	1,260
3	UNIX	Operating System Software	824
4	C++	Object or Component Oriented Development Software	683
5	JavaScript	Web Platform Development Software	589
6	Practical extraction and reporting language (Perl)	Object or Component Oriented Development Software	453
7	Microsoft (MS) Office	Office Suite Software	447
8	Git	File Versioning Software	436
9	Structured query language (SQL)	Database User Interface and Query Software	433
10	VMWare	Configuration Management Software	384

Source: Online advertised jobs data  
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### Education Level of Jobs and Candidates Table

The table below shows the minimum level of education requested by employers on job openings and green jobs advertised online, as well as the educational attainment of potential candidates in the workforce system that are looking for jobs in Howard County, MD on January 27, 2021. There were 10094 job openings advertised online that did not specify a minimum education requirement.

Education requirements continue to be high in the County with almost 50% of the jobs requiring at least a bachelor's degree. There continues to be a good number of jobs still only requiring a high school diploma, or no minimum of education required

Rank	Education Level	Job Openings	Percentage of Job Openings	Green Job Count	Percentage of Green Jobs	Potential Candidates	Percentage of Potential Candidates
1	No Minimum Education Requirement	505	3.96%	14	5.07%	0	N/A
2	Less than High School	0	N/A	0	N/A	309	2.01%
3	High School Diploma or Equivalent	539	4.22%	25	9.06%	3,648	23.76%
4	2 Years of College or a Technical or Vocational School	1	0.01%	0	0.00%	0	N/A
5	3 Years of College or a Technical or Vocational School	1	0.01%	0	0.00%	0	N/A
6	Vocational School Certificate	1	0.01%	0	0.00%	1,092	7.11%
7	Associate's Degree	86	0.67%	0	0.00%	1,343	8.75%
8	Bachelor's Degree	1,365	10.69%	27	9.78%	4,448	28.97%
9	Master's Degree	120	0.94%	3	1.09%	1,976	12.87%
11	Specialized Degree (e.g., MD, DDS)	3	0.02%	0	0.00%	106	0.69%
10	Doctorate Degree	49	0.38%	3	1.09%	328	2.14%
12	Not Specified	10,094	79.08%	204	73.91%	0	N/A

Source: Job Source: Online advertised jobs data  
Candidate Source: Individuals with active résumés in the workforce system.  
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### Work Experience of Jobs and Candidates Table

The table below shows the minimum required work experience on job openings and green jobs advertised online, as well as the experience level of potential candidates in the workforce system that are looking for jobs in Howard County, MD on January 27, 2021 (Jobs De-duplication Level 2).

Over 11,000 of the available jobs are seeking candidates with at least a year or two of experience or more. Experienced candidates are in high demand in the county with over 13,000 of the available candidates meeting the threshold.

Rank		Experience	Job Openings	Percentage of Job Openings	Green Job Count	Percentage of Green Jobs	Potential Candidates	Percentage of Potential Candidates
1		Entry Level	536	4.20%	26	9.59%	0	N/A
2		Less than 1 year	39	0.31%	1	0.37%	1,371	8.90%
3		1 Year to 2 Years	11,077	86.78%	216	79.71%	535	3.47%
4		2 Years to 5 Years	654	5.12%	17	6.27%	1,606	10.42%
5		5 Years to 10 Years	304	2.38%	6	2.21%	2,267	14.71%
6		More than 10 Years	154	1.21%	5	1.85%	9,633	62.50%

### Candidate Area Distribution Table

The table below shows the counties in Maryland with the highest potential candidates in the workforce system on January 27, 2021. Although it is not one of the largest jurisdictions, Howard County ranks 5<sup>th</sup> terms of candidates in the population.

Rank	Area Name	Candidates
1	Baltimore County, MD	17,046
2	Montgomery County, MD	16,765
3	Prince George's County, MD	16,441
4	Anne Arundel County, MD	15,547
5	Howard County, MD	15,412
6	Baltimore, City of, MD	15,342
7	Harford County, MD	12,893
8	Frederick County, MD	12,857
9	Carroll County, MD	12,813
10	Charles County, MD	11,991

Source: Individuals with active résumés in the workforce system.  
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## Labor Force, Employment and Unemployment Distribution Table

The table below shows the counties with the highest preliminary unemployment rate in Maryland for November 2020. These figures are not seasonally adjusted.

Howard County is tied for the 3rd lowest unemployment rate in the State of Maryland. In this area, our businesses still face challenges finding the highly qualified employees they need to fill their open positions. In addition, is equally difficult to fill low skilled jobs due to competition from the overall region.

### The table below shows the monthly not seasonally adjusted Labor Force, Employment and Unemployment data for Howard County, MD in November 2020.

Rank	Area	Civilian Labor Force	Number Employed	Number Unemployed	Unemployment Rate	Preliminary
24	Carroll County, MD	91,157	87,114	4,043	4.4%	Yes
23	St. Mary's County, MD	53,021	50,576	2,445	4.6%	Yes
22	Queen Anne's County, MD	26,250	25,009	1,241	4.7%	Yes
20	Calvert County, MD	47,860	45,528	2,332	4.9%	Yes
21	Howard County, MD	181,494	172,617	8,877	4.9%	Yes
19	Harford County, MD	135,354	128,642	6,712	5.0%	Yes
18	Caroline County, MD	16,775	15,925	850	5.1%	Yes
17	Talbot County, MD	17,555	16,650	905	5.2%	Yes
16	Anne Arundel County, MD	305,213	288,887	16,326	5.3%	Yes
14	Frederick County, MD	130,507	123,425	7,082	5.4%	Yes
15	Garrett County, MD	14,438	13,654	784	5.4%	Yes
13	Cecil County, MD	49,288	46,595	2,693	5.5%	Yes
12	Washington County, MD	70,463	66,348	4,115	5.8%	Yes
11	Kent County, MD	9,085	8,544	541	6.0%	Yes

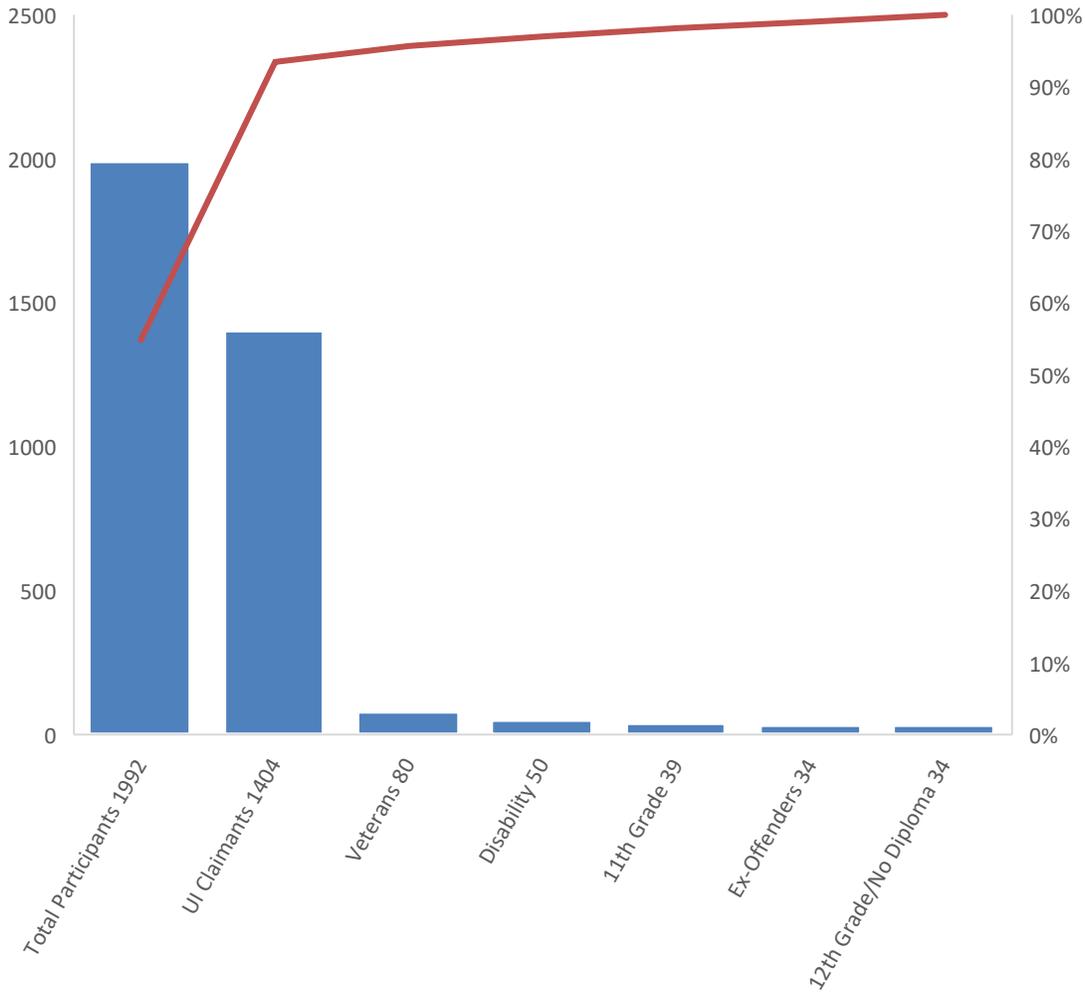
10	Baltimore County, MD	441,426	413,400	28,026	6.3%	Yes
8	Charles County, MD	84,631	79,121	5,510	6.5%	Yes
9	Montgomery County, MD	554,024	518,243	35,781	6.5%	Yes
6	Allegany County, MD	29,825	27,856	1,969	6.6%	Yes
7	Dorchester County, MD	14,513	13,552	961	6.6%	Yes
5	Wicomico County, MD	47,679	44,402	3,277	6.9%	Yes
4	Somerset County, MD	8,207	7,557	650	7.9%	Yes
3	Baltimore, City of, MD	283,258	259,140	24,118	8.5%	Yes
2	Prince George's County, MD	506,075	460,775	45,300	9.0%	Yes
1	Worcester County, MD	23,717	21,420	2,297	9.7%	Yes

Source: LAUS Unit and Bureau of Labor Statistics  
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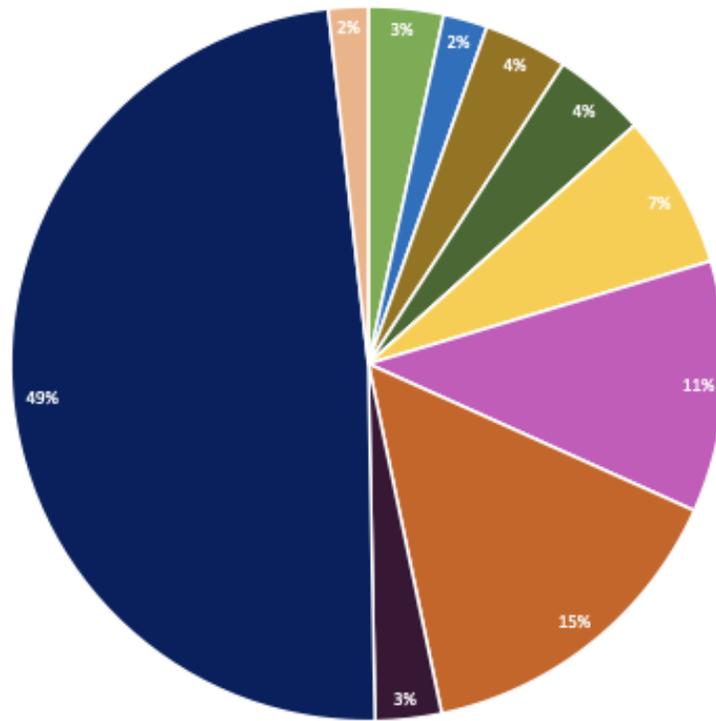
Area	Civilian Labor Force	Number Employed	Number Unemployed	Unemployment Rate	Preliminary
Howard County, MD	181,494	172,617	8,877	4.9%	Yes
Maryland	3,134,905	2,927,624	207,281	6.6%	No
United States	160,468,000	150,203,000	10,264,000	6.4%	No

Source: LAUS Unit and Bureau of Labor Statistics  
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Wagner-Peyser  
Enrolled Individuals  
07/01/2019-06/30/2020



### Customers served with barriers



- Displaced Homemaker
- Migrant Seasonal Farmworker
- Ex Offender
- Homeless
- Cultural Barriers
- Disabilities
- TANF Exhaustee within 2 years
- English Language Learner
- Long term Unemployed
- Low Literacy
- No High School Diploma
- Low Income
- Native American

Howard County has over 9,544 employers with approximately 177,000 people in the labor force and a median income of \$121,160 for 2015-2019. (US Census) Over half of Howard County's workforce commutes outside of the area. Significant numbers of commuters from across the state of Maryland as well as out-of-state workers come into Howard County for employment. Education is highly valued in the Area. The 2019 Maryland Report Card indicates that Howard County has a high school graduation rate of approximately 93%. In addition, the report indicates that over 83% of Howard's graduates were enrolled in college 12 months post-graduation.

A growing number of Howard County's population faces challenges due to their lower English language proficiency. Howard County's increase in diverse cultural demographics is a contributing factor and further validates the importance of ESL programs and the role they will play in helping our diverse population successfully integrate into the workforce. According to Project Literacy, in FY19 approximately 85% of their Adult Education students were involved with ESL. According to the Maryland Department of Planning, from the Population Division, U.S. Census Bureau, reports showed that from July 1, 2017- July 1, 2018, Howard County was tied for the second highest population growth in Maryland at 1.2%. Anecdotally, we have learned that there is an increase in the Spanish speaking population, particularly from Central America, as well as an increase of various Asian populations.

Howard 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 2019 American Community Survey 1-Year Estimates, approximately 5.9% of Howard population ages 18-64 have a disability. During the 2019 Fiscal Year, Mid-Maryland's Division of Rehabilitation Services Annual Report showed 23,121 individuals were served, 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.

Howard County's AJC provides comprehensive employment services to assist ex-offenders and those who are close to release. When operating in person, there continues to be times designated for re-entry individuals to meet with someone in the AJC to ensure a "warm handoff" and enhance the comfort level of the returning citizen when using AJC services; this service is available remotely too! Through representation on the Re-entry Coordinating Council 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 Department of Correction and have a dedicated staff member who provides employment related workshops to educate inmates on labor market information and other resources offered at the American Job Centers.

In Howard County, public transportation has contributed to the challenges some employer's face in finding and retaining employees for in-person employment. With the growing population and increased congestion, the area 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. This has been exaggerated by individuals being concerned about using public transportation during a pandemic.

(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.

Howard County has the capacity to provide a range of workforce development activities. Our workforce development system strives to align workforce activities with business needs. Howard 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 Centers (CTC) provide 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 CTCs. They may also participate in youth apprenticeships. WIOA Title 1 staff serves on the advisory boards for the CTCs. The community colleges, particularly the Continuing Education divisions, create programs that effectively respond to the skills required by area business. Registered apprenticeship opportunities are available in Howard County through the public schools, Howard Community College, private vendors/sponsor.

There are numerous quality-training providers and programs in Howard County and the surrounding area. However, we are limited by the number of programs in our area on the Eligible Training Providers List (ETPL). Fortunately, our central location allows for participants to access training outside of the County. Most classes are offered virtually during the pandemic. This allows for access to additional training opportunities because distance is not a factor.

High caliber business services teams assist business with overcoming the challenges of recruiting, retaining, and developing talent. The Business Services Team has a clear understanding of industry skill needs, identifies appropriate strategies for assisting employers, and coordinates business services activities across partner programs. The Team presents a unified voice for its communications with business.

As mentioned previously, the Howard County team uses data in making decisions regarding service delivery. The long-term labor market study will be presented to the Howard County Board/Partners. This study addresses the needs of businesses.

Additionally, the Mid-Maryland WDB addressed the essential skill needs of businesses during the strategic planning meeting. The Board has determined the following skills as most important:

Communication  
Teamwork  
Dependability  
Digital Literacy

We will be incorporating these skills into workshops, skills training and one-on-one meetings with participants.

**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
- Integrated services teams
- Strong customer service focus; high quality and specialized career services
- System partners work well together and have existing relationships

**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 further systematize services and electronic processes.
- Need a statewide common intake process with partners that is more customer-friendly and streamlined to alleviate “agency time” for clients
- Need coordinated state management IT systems for all mandated partners, at minimum
- Limited public transportation options
- Limitations of ETPL

(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 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 Howard County and the region; our mission directly supports economic business growth.

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

Howard County’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. Historically, we have worked to promote these concepts even prior to the Benchmarks of Success being a framework for service delivery.

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 based on formal and informal labor market data. We will provide training opportunities to narrow the hard skills gap that have been identified. For example, there is a continued demand for supply chain drivers which has increased since the pandemic. In response to this demand, we provide training leading to CDL licenses. We provide training toward other in-demand jobs requiring credentials, certifications and ultimately employment. We are providing classes to assist customers with increasing opportunities (Benchmarks 1, 2 and 3).

We have commissioned both short-term and long-term labor market studies as they relate to workforce development and the pandemic. We plan to use those results to identify industries that should lead to increased access to employment in a post-pandemic economy. Using our short-term study, we are working with HCC to develop customer-service training. Many jobs lost during the pandemic impacted low wage earners in the hospitality, food service, social assistance and retail fields. The customer service training is a direct result of the study. The expectation is that this will assist individuals with being more competitive for the reduced number of jobs.

WIOA Performance Metrics	Agreed Upon Goals for PY2021 (Mid-Maryland)
<b>Adult Measure</b>	
Employment Rate 2nd Quarter after exit	76%
Employment Rate 4th Quarter after exit	72%
Median Earnings 2 <sup>nd</sup> Quarter after exit	\$5900
Credential Attainment within 4 quarters after exit	60%
Measurable Skills Gain	53%
<b>Dislocated Workers</b>	
Employment Rate 2nd Quarter after exit	80%
Employment Rate 4th Quarter after exit	76%
Median Earnings 2 <sup>nd</sup> Quarter after exit	\$9000
Credential Attainment rate within 4 quarters after exit	56%
Measurable Skills Gain	55%
<b>Youth</b>	
Employment Rate 2nd Quarter after exit	69%
Employment Rate 4th Quarter after exit	65%
Median Earnings 2 <sup>nd</sup> Quarter after exit	\$3500
Credential Attainment	63%
Measurable Skills Gain	48%
<b>Wagner Peyser</b>	
Employment Rate 2nd Quarter after exit	59%
Employment Rate 4th Quarter after exit	58%
Median Earnings 2 <sup>nd</sup> Quarter after exit	\$6600

We want to continue partnering with organizations serving 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 connect to even more. We plan to accomplish this by expanding outreach to other service providers of these targeted populations. We are expanding our partnership with the Community Action Council, FIRN which is an organization working with foreign born individuals, the Howard County Library System and others. 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 Howard County WDB 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.

Howard County's goals will increase the economic growth and self-sufficiency to lead to a better prepared and responsive workforce using the Benchmarks of Success. Howard County 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.

We have held and will continue to hold local partner meetings to ensure alignment of the system and to make the best use of resources available. The goal for is an integrated system that is responsive to local and regional workforce needs. Collaboration results enhanced customer service. Howard County, being its own workforce area, allows for the focus to be on the needs of this jurisdiction and region. One of the goals for this workforce area is to systematize workforce development in the County and continue to collaborate to break down silos.

The WDB held a special meeting to work on our local plan. Board members discussed different aspects of the plan and provided input on ways to increase collaboration among partners. The board recommended the following in addition to what already occurs:

- a. The state developed a common referral system used by all partners and incorporated into how they we business and an electronic way to track referrals
- b. Collaborative presence among partners and in the business community
- c. Educating the educators (apprenticeship/trade awareness). The Board would like to see the all of the K-12 education system including parents and students (not just CTE) understand the benefits of apprenticeship, working in the trades and how lucrative these career fields can be.

These points will be addressed during partner meetings and we will work toward implementation. We would like for the state-level partners to develop a consistent platform all partners can use for tracking, communicating, case management etc. It seems there are multiple platforms tracking the same information which is in opposition with strengthening and enhancing the effectiveness of the system.

A customer-centered approach has been and will be the cornerstone of our service delivery. We have been having regular joint trainings for staff as well as partner manger meetings, since the developing the last plan. We intend to continue and expand that by potentially including other partners. Regular meetings are set up with our Economic Development Authority and Howard Community College. Many of the partners are on boards together and see each other either in person or remotely on a regular basis. This reinforces the positive relationships that exist especially since many partners are working virtually during the pandemic. The partners will continue:

- Increasing opportunities for cross training of staff fostering timely and responsive services without duplication
- Sharing information to ensure alignment with the goals identified by the board
- Share a point of contacts for each partner to enhance the customer referral process

The partners are dedicated to seeing our workforce system succeed and be one of the best in the state.

- (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.).

Howard County 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)
- Maryland Department of Labor (Wagner Peyser, Veterans, Trade, U.I and Migrant and Seasonal Farm Workers)
- Division of Rehabilitation Services (DORS)
- Adult Education & Literacy
- Carl Perkins
- TANF
- Job Corps
- Community Services Block Grant
- SCSEP

Many of the programs are co-located and plan to continue once we return to the office. For example, in the Howard County WIOA Title 1, Maryland Department of Labor, and DORS are co-located in a comprehensive AJC full time with part-time DSS and SCSEP representation. Adult Ed works closely with the Title 1 staff through WIOA, the Career Pathways Grants, and various boards and committees; as needed, staff will attend each other's team meetings to present and share information. A WIOA staff person, acting as a point of contact, briefs soon-to-be-released individuals on available services. Many returning citizens are TANF recipients once they are released. Veteran representatives (DVOP's) also meet with veterans with significant barriers in the detention center to address their needs and to describe services specific for veterans. In Howard County basic skills assessments are coordinated with Adult Education to avoid duplication. Title 1 staff provide information sessions, either virtually or in person, for TANF participants. We expect to work more closely to serve foster care youth exiting the system in Howard County.

All partners plan to continue communicating regularly to ensure services are provided seamlessly, collaboratively and without duplication. The aspirational goal is a coordinated workforce system. Core partners meet regularly 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. For example, the Core partners have set up quarterly combined staff trainings, which began after the adoption of the previous Plan. We share information about services and resources available for participants and businesses or topics relevant to the local workforce system. These trainings allow staff to learn about appropriate referrals for each agency and how to access services. In addition, we have invited and plan to continue to invite other partners serving barrier populations to ensure customers have access to all community resources not just those within the AJC.

Title 1 staff are members of the local public school systems' Carl D. Perkins Career and Technical Education Advisory Boards. The programs of study are developed with input from these advisory boards that also align with the priority industries identified in our plan. Additionally, a member of the Career and Technology Education Program serves on the Workforce Development Board. Title 1 staff serves on the Youth Apprenticeship Advisory Council. We have held periodic meetings for apprenticeship organizations in the County.

Although Job Corp is not located in Howard County, the Title 1 youth coordinator works closely with them. She refers youth who are appropriate for their services. She also serves on boards and committees within Job Corp.

The CSBG grantee is the Community Action Council. We have always and will continue to work with their clients. Periodically, the CAC presents at workforce center meetings on services available. They will participate in partner meetings/trainings and on the WDB. A CAC representative is co-located at the Howard County Multi-Services Center along with AJC/title 1 staff.

The SCSEP representative participates in partner meetings and trainings. When the office is open, the SCSEP representative works as a part-time receptionist and provides information on the SCSEP program.

Programs of study will be developed based on the following: employer input, labor market information, priority industries, and industries/occupations we expect to be in demand post-COVID-19. We will also use labor market data including but not limited to: 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 we collaborate with: housing, health departments, the library, the Local Children's Boards, and homeless 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, the Day Resource Center and, the Multiservice Center and others. We have expanded our social media presence and expect to continue to expand it. Many individuals in the AJC have personal distribution lists which we use to share information about services and events.

In order to facilitate co-enrollment and improve access to activities, we are striving to have one dedicated point of contact for each core partner (WIOA, WP, DORS, DSS, Adult Education) to streamline customer service, referrals and response. 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 data to identify career pathways that align with the established need as well as the other LMI identified by the board. Title 1 received a Careerpathways grant to train English Language Learners in entry-level healthcare occupations and ESOL. We partnered with both Adult Education providers in the County for this grant. It was so successful that in the next round of funding the Community College applied for and received a grant to provide similar services but for Ophthalmic Technicians. This grant is occurring now with the same partners. We plan to continue using this careerpathways model to expand to other populations and training areas.

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 continue to increase registered apprenticeship opportunities to create career ladders leading to successful employment for our customers. These strategies are in direct alignment with the Benchmarks for Success.

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

We meet and work regularly with the entities identified in A. The Workforce Development Board has been discussing the formulation of the plan. The Board held a plan-specific work session/meeting which included presentations from the GWDB, and input from businesses and partner organizations, then subsequent individual meetings were held with each partner. Each board member received a copy of the

draft plan to provide additional input.

(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;

The WDB identified strategies for engaging business and supporting a workforce development system that meets the needs of business in our local area. The italicized strategies identify those that the board deems most important.

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
- Streamline information presented to businesses
- Increase awareness of services available to business
  - Increase social media outreach (i.e. LinkedIn groups)
  - Increase outreach through business and industry trade associations, real estate brokers (leasing space to incoming or expanding businesses)
  - Establish an outreach subcommittee to continuously seek ways to engage target businesses
  - Increase speaking engagements in the business community
  - 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
- Invite industry representatives to speak with job seekers
- Monitor WARN notices
- Continue regular meetings with Economic Development to support businesses seeking employees and people seeking employment opportunities
- Establish a regular interval and method for communication of updates - perhaps at WDB meetings
  - 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
- Strengthen linkage between U.I and AJC
  - Locally, AJC staff assists with helping job seekers file U.I. claims and setting up appeal requests. We plan to request staff training from U.I. for the AJC. In Howard County, there is a specific point of contact from the U.I. system to help with RESEA and ROW as well as more complex U.I. issues. Having a direct point of contact will strengthen the linkage between programs. We implemented RESEA and ROW locally, which has direct ties to U.I.
- 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 Ed. 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: 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.

We have already started implementing initiatives designed to meet the needs of businesses. For example, in Howard County the OJT program has been available for many years and we have successfully used it; we support Incumbent Worker training locally and plan to continue it. We have used our local incumbent worker training program and Maryland Business Works 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. We have partnered with other workforce areas to respond to the regional need for cyber security. We support and work with our community colleges in creating training programs consistent with career pathways and registered apprenticeship initiatives. Howard County received a Careerpathways grant to address the shortage of skilled entry level healthcare workers. We worked with both Adult Ed providers in the County to deliver a Careerpathways program and Integrated Education and Training. Based on the success of that grant we are participating, with the same partners, in another grant for Ophthalmic Technicians. We plan to continue moving forward with this model and seeking additional Career pathway grant opportunities.

Howard County has held several successful apprenticeship events since October 2018. Some of the events were information sessions for the public, held at the Columbia AJCS, to spread the word about apprenticeship opportunities. During the pandemic and virtual work, we held a virtual event to increase interest in apprenticeship. We plan to continue these events. Before the event was over, the apprenticeship sponsors and employers requested subsequent events. We learned at the first event that there was a need to provide specific information about what an apprentice is. We held workshops at the subsequent events describing apprentices. We have also held events targeted toward businesses. These events were to increase business participation the apprenticeship program. Like the job seeker events, we will continue holding them virtually during the pandemic. The Director sits on the Youth Apprenticeship Board in the County and apprenticeship is represented on the WDB. The County Executive is a huge supporter of apprenticeships and attends and promotes our apprenticeship events. He has added four apprenticeships to Howard County Government.

We have held and plan to continue holding industry-specific recruitment events. Since the pandemic, we typically invite three – five employers in the same industry to present about their specific business and their job openings. In conjunction with several community business partners we are planning to send a survey to area businesses and including a question on interest in an industry sector partnership. We hope to develop more industry sector partnerships as time goes on.

- (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.

Workforce Development activities are currently being coordinated. in Howard County, the Economic Development Authority is a close partner and represented on the WDB. We will continue to promote entrepreneurial skills and microenterprise services using various means to include:

- A. Support Client Self-Employment Options

- Link workforce services with the programs of the Maryland Center for Entrepreneurship and the Small Business Development Center (SBDC), the Service Core of Retired Executives (SCORE), and at the community colleges.

- 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 sign up for such services available to support WDB clients seeking to start their own businesses.

- C. Connect with the SBDC to support self-employment

- (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 supportive 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. As an example of partnership with the Local Management Board, we work together on our annual youth job and resource fair. This is a direct result of our relationship. The Director serves as VP of the local Management Board. For the current year and next year we have a grant to provide summer youth employment services to disconnected youth and youth at risk of disconnection. The relationships, at the staff and management level, allows for us to understand who provides which supportive service and more readily access them on behalf of our customers.

Another example is that we may provide training for a recipient of DSS services but the DSS will provide the supports such as childcare and transportation to allow the individual to attend training. We work closely with our Community Action Council, Library, Office on Aging, and many others to further leverage and coordinate supportive services.

- (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.

Howard County believes in 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 will tap into our WDB to obtain industry information for the new board will represent industry in the area. 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 colleges and economic development offices and their related advisory groups to obtain this valuable information. Our job seeker 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 participates on Howard County Chamber of Commerce committees to glean information and engage businesses. Another strategy we intend to 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 opportunity in demand by our businesses community.

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

The Mid-Maryland Workforce Development Board is committed to serving businesses.

We 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. Ongoing
- Ensure available training matches the area's workforce needs. Ongoing
- Stay apprised of and advocate for career pathways programs particularly advocating for business and industry connections for work experience and internships. Ongoing
- Support job readiness training. Ongoing
- Support business and education activities including mock interviews with professionals and workforce staff. Several times per year staff participates in mock interview sessions youth and as needed with adult job seekers; the WDB supports structured mock interview sessions
- Sponsor Meet and Greets with industry representatives for youth through adults. We encourage participation with Chamber of Commerce and Economic Development meet and greets
- Host Career Fairs to include industry professionals. Ongoing

We are working with multiple industry groups to assist and develop strategies to respond to the shortage of skilled entry-level direct-care staff. Through the development of our regional plan, we expect to develop regional industry sector partnerships that should evolve .

As mentioned earlier, we have held several apprenticeship events for both businesses and job seekers to spread the word about apprenticeship and engage more individuals and businesses in it. The Title 1 Director serves on the Youth Apprenticeship Advisory Council for the school system and Apprenticeship staff from the public schools serve on the WDB. The County Executive is a huge supporter of apprenticeships and expanding apprenticeship opportunities locally is important to him. We plan to host more events and continue to engage the community in learning more about this wonderful talent pipeline.

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

We have strong partnerships with many community-based organizations in our area. The workforce development system is supported by many of these organizations. Success in Style, a local non-profit, provides interviewing and work attire free of charge for individuals with barriers to employment. Bridges to Housing Stability provides housing for homeless or those at risk of becoming homeless. They refer clients for workforce assistance, and we refer clients to them. Staff reaches out to faith-based organizations to share information about services and events sponsored by the Center. We have offered workshops at some of our faith-based and community-based organizations and serve on many Boards with them.

#### 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 Columbia Workforce Center (CWC)**

Comprehensive Site

7161 Columbia Gateway Drive, Ste. D

Columbia, MD 21046

410.290.2620

- (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: <http://www.labor.maryland.gov/employment/mpi/mpi5-20.pdf>.*

Howard County 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 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, Howard County has developed partnerships with both mandated partners and other resources that are coordinated to ensure uniformity and minimize any duplication of effort. Referrals are made to the appropriate partner(s). A common intake method is being discussed with the hope that the State, with its partners, will coordinate a technology-based tool that all partners could access.

Howard County's eligibility process may include 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 encouraged to register using the MWE system. We have streamlined the eligibility intake process with partner programs and since the pandemic are providing services remotely. For those job seekers who meet Adult, Youth, or Dislocated Worker eligibility guidelines, required documents are uploaded into the MWE system and we plan to continue this process. The exception to this are Veterans. Howard County 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 prevocational 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. Services are being provided remotely during the pandemic.

- (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 will competitively bid the One Stop Operator through the Howard County local government's procurement office in accordance with WIOA law and regulations. Selection of the One Stop Operator will be made by WDB members after review and rating the submitted proposals. The board has the option to renew 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: <http://www.labor.maryland.gov/employment/mpi/mpi9-17.pdf>.*

Howard County 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. We request 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 and the state 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 have increased our use of technology in service delivery since the COVID-19 pandemic and intend to continue this trend. All services in the workforce system are provided virtually. Howard County Government created a Digital Equity workgroup in which Title 1 management participates. Through this workgroup we are able to access a limited number of Chromebooks for customers to use. This workgroup is exploring all digital equity issues that exist in the County and we are seeking remedies for digital inequities.

We have a strong partnership with the Howard County Library System and they created a loan program for Chromebooks and hotspots. Our customers are given priority to access the equipment and together we developed a direct referral system for our customers. Although this is an excellent resource for customers the library has a six-week loan limit. Customers often need computer access for much longer. We are continuing to explore various ways to help customers meet their technology needs.

We continue to use technology to communicate with customers through various means such as email, phone, social media, and websites. Free WIFI is available in many areas of Howard County which allows for ease of communication. We use social media and MWE to advertise events and provide information

about our services. When we are back on-site, we have a large computer with a camera available so customers and clients may use it for video interviews.

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. If individuals do not have Internet access at home and cannot get to a physical AJC, they are told of other places where there is free public Internet access in the community, or we recommend they contact the library to see if they have hotspots available

Once the pandemic is over, the Howard County staff will provide services at various locations to increase outreach such as libraries, homeless shelters, CAC, community resource fairs and other places where individuals may have challenges accessing services. We use extensive electronic distribution lists to inform the community of services being delivered.

(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>.*

In Howard County, we are striving toward a comprehensive and integrated system that provides a no wrong door approach to service delivery. We will continue to work closely with our partners toward achieving this goal. We expect this enhanced collaboration between the partners will lead to better service for business and job seeker customers. 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 at the local level. The goal of the AJC is for customers to leave our AJCs, either virtually or in person, feeling more empowered to meet their workforce development goals than when they entered the centers. 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**

<ul style="list-style-type: none"> <li>• Career Centers w/Internet, copying, faxing, etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Business Consultation</li> </ul>
<ul style="list-style-type: none"> <li>• Maryland Workforce Exchange (mwejobs.maryland.gov)</li> </ul>	<ul style="list-style-type: none"> <li>• Labor Market Information</li> </ul>
<ul style="list-style-type: none"> <li>• Job Search Workshops and Seminars</li> </ul>	<ul style="list-style-type: none"> <li>• Youth Services</li> </ul>
<ul style="list-style-type: none"> <li>• Career Assessment , Counseling and Planning</li> </ul>	<ul style="list-style-type: none"> <li>• Training Information and Services</li> </ul>
<ul style="list-style-type: none"> <li>• Résumé and Interviewing Assistance</li> </ul>	<ul style="list-style-type: none"> <li>• GED/ National External Diploma Program Information</li> <li>• English Language Learner Information</li> <li>• Adult Basic Education</li> </ul>
<ul style="list-style-type: none"> <li>• Veteran Services Program</li> </ul>	<ul style="list-style-type: none"> <li>• Grants and Outplacement Assistance (Businesses)</li> <li>• Recruitment</li> </ul>
<ul style="list-style-type: none"> <li>• TRADE Act Program (TAA)</li> </ul>	<ul style="list-style-type: none"> <li>• Tax Credit information</li> </ul>

<ul style="list-style-type: none"> <li>• Migrant Seasonal Farmworker Program (MSFW)</li> </ul>	<ul style="list-style-type: none"> <li>• Unemployment Insurance (UI) Information</li> </ul>
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**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:

<ul style="list-style-type: none"> <li>▪ Career decision making and counseling, to help find a career path that best suits interests and abilities</li> </ul>
<ul style="list-style-type: none"> <li>▪ Rehabilitation technology services, to find solutions to help perform the job to the best of one’s ability</li> </ul>
<ul style="list-style-type: none"> <li>▪ Employment and skills training</li> </ul>
<ul style="list-style-type: none"> <li>▪ Job search and placement services</li> </ul>
<ul style="list-style-type: none"> <li>▪ Job coaching and supported employment services</li> </ul>

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:**

<ul style="list-style-type: none"> <li>▪ GED and NEDP Prep and Testing and English Language learning</li> </ul>
<ul style="list-style-type: none"> <li>▪ Adult Basic Education</li> </ul>
<ul style="list-style-type: none"> <li>▪ Assist adults to become literate and obtain knowledge and skills necessary for employment and self-sufficiency.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Assist adults who are parents to obtain educational skills necessary to become full partners in the educational development of their children.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Assist adults in the completion of a secondary school education.</li> </ul>

Howard Community College and Howard County Library System provide adult basic education and literacy training. Title I customers are referred to ABE and Literacy Works programs, GED and External Diploma programs, based on the customers’ needs. We have MOUs with these entities 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 AJCs will continue to serve as host sites and refer individuals to the SCSEP Program; during the pandemic the SCSEP worker continues to monitor phone calls remotely and enter data into MWD

Unemployment Insurance provides:

- 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.

(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 Howard County Board 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 - <https://www.gpo.gov/fdsys/pkg/USCODE-2008-title38/pdf/USCODE-2008-title38-partIII-chap42-sec4215.pdf>; A Protocol for Implementing Priority of Service For Veterans and Eligible Spouses: <https://wdr.doleta.gov/directives/attach/TEN/ten2010/ten15-10a1.pdf>.*

## 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 TEG 7-20, 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 Howard County. 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.

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.

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.

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 8th 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.

- (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 the Mid-Maryland board. Howard County may use up to 20% of Adult and Dislocated Worker funds to provide incumbent worker training. It 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 will be required to pay 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 all we do in Howard County. We consider everyone with whom we come in contact to be our customers, both internal and external to our system and use formal and informal mechanisms to track customer service. Our AJC has an excellent reputation for customer service. Based on feedback received, staff training will be provided as needed and will continue to be incorporated as part of how we do business. Staff participates in a variety of trainings. Staff has been involved with many trainings, since COVID-19, about how to deliver services virtually, labor market data and customer service during the pandemic. In order to provide even better service all Title 1 staff and Title III managers are participating in Racial Equity Training. We will be reviewing services and developing a plan to ensure we are providing services equitably and identifying areas where we can improve.

## 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 Howard County 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; services are provided virtually during the COVID-19 pandemic.

We support an integrated service delivery system for job seekers and business. Everyone may access career services. During the pandemic, we encourage access to services through the use of technology. We will continue to provide virtual services for individuals who cannot access the center or for whom it is not convenient. We will continue to prepare an educated and skilled workforce that meets the needs of business. Our workforce system has the resources, services, and tools to assist individuals in obtaining and maintaining good jobs and improve employment prospects for success. We are working with the County and partners to help ensure all job seekers have access to job search tools and resources such as, MWE and other internet-based job search websites; linkages to community partners; access to local, regional, and national labor market information and recruitment events. 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. For example, we provide employment services for the local shelter, refer customers who are in need of appropriate business attire to non-profit partners and work from satellite offices in low-income areas.

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

The Business Service team will participate in sector partnership activities in the identified key industries. We will continue to engage business in discussions about their industries, training needs, skill gaps, and what they believe their future needs will be. The information gathered helps identify specific in-demand short-term training that results in certificates and credentials. This leads to a talent pipeline of individuals who possess the knowledge, skills and abilities that match the labor market demand.

Howard will hold in person and virtual job fairs and recruitment fairs 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 local and regional employer needs. We 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: <http://www.labor.maryland.gov/employment/mpi/mpi5-18.pdf>.*

We provide rapid response activities in response to the WARN Notice and other layoff situations to dislocated workers by conducting information sessions at the location that is closing or reducing staff or virtually. We team with Maryland Labor staff, other workforce areas and other partners to provide comprehensive information including information on available services, job leads, unemployment insurance, layoff aversion strategies and information on TAA, as applicable. We invite a member of the health department to attend Rapid Response sessions with us to provide information on health benefit options available. The dislocated workers are encouraged to access the full array of services available and at the American Job Center whether in person or virtually. They are provided information about how to access MWE and other job search tools electronically. We work with partners to diminish the time between the rapid response and the individual obtaining employment. We will hold recruitments events, based on skills of impacted workers and labor market demand, either at the AJC, the impacted location or virtually. In order to maximize re-employment opportunities, we may collaborate with the state regional business services represented for local or regional targeted recruitments for affected workers and expect the state reps will collaborate with us when taking the lead. We plan to use this model 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: <http://www.labor.maryland.gov/employment/mpi/mpi8-15.pdf>.*

Howard County 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 Howard 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. Aside from providing the 14 required elements through a staff or partner, we have the support of County Government in providing work and learn opportunities. Youth participants have the opportunity to work as contingent employees of Howard County and experience real-life work. For example, participants have worked in the Office of Human Rights, Transportation, Finance, Fleet, Purchasing, Office on Aging and many others including private businesses. These offices have already hosted participants in work and learn opportunities and Finance has hired one youth and Recreation and Parks hired another. We have also had youth participate in pre-apprenticeships and apprenticeships. We will continue to incorporate this work and learn method in the future. During the pandemic, we are exploring other opportunities for youth including virtual opportunities. We plan to incorporate this into future work and learn activities.

Youth with disabilities are incorporated into our year-around and summer youth programs. We provide the same level of services to them as we do to anyone else. When required, we partner with DORS and/or the school system in the provision of services. We outreach to disability organizations in the community for events and youth program participation.

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. Staff also participates on the Youth Apprenticeship Advisory Council and Howard County has one of the most successful Youth Apprenticeship programs in the state.

Another model is Job Corps. Job Corps is a free education and training program that helps young people learn a career, earn a high school diploma or GED, and find and keep a good job. 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.

The Director participates on the Local Children's Board as the Vice Chair. The LCB funds several programs in the County which serve youth including, food distribution, mental health, and summer youth employment which the Howard County Office of Workforce development implements.

- (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.

In Howard County, we will continue 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 to refer students to each other and coordinate service whether working virtually or in person. We serve on the advisory board of the CTC, and our WDB community college and CTC partners are active on the board.

The WDB is an avenue for partners to work toward coordination of education and workforce development activities. Howard County 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. The 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.

- (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. We may provide supportive services, as WIOA funding allows, to an individual on an as-needed basis.

Public transportation has historically had its challenges in Howard County and affects job seekers' ability to obtain and retain employment. We will continue to partner with transportation offices to identify gaps in services that would typically affect our customers. Together, we have identified parts of the county where businesses have a need for employees but transportation becomes a barrier to staffing. We serve on local boards that examine the workforce transportation challenges in our area and try to determine ways to mitigate those challenges.

- (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 such as: 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 the most comprehensive services and referrals.

Priority is given to the adult groups specified in the state plan. Through an initial assessment, we will identify if an individual qualifies for POS. We may use funding to provide the full array of WIOA 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 individual employment plan that will map out a path to help them achieve their goals. As funding is available, we provide training that allows for someone to begin employment above entry-level and be on a career path. Together with the job seeker, we will provide training that will lead to employment in the local and regional labor market. Meeting the needs of business is priority when assisting individuals with focusing on a career. We will focus on 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.

Funding will be used to support both in-person and virtual workforce needs.

- (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 the most comprehensive referrals and services.

We 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 allows us to further understand or respond to business needs to support the local economy. We will use dislocated worker funds to support rapid response activities in the area as funding allows.

Funding will be used to support both in-person and virtual workforce needs.

(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:

Employed Adults –self-sufficiency is defined as exceeding 175% of the USDOL Lower Living Standard Income Level (see specifics below)

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 because they have physical or other limitations, which would prevent reentry into the former industry or occupation, as documented by a physician or other applicable professional.
- 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 laid off on a temporary basis, with a specific return date do **not** meet the criteria of unlikely to return work in a previous industry or occupation.
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(J) A description of how the Local Board will interpret and document eligibility criteria for in-school youth “requires additional assistance to complete an educational program or to secure or hold employment” as set forth in the State’s Youth Policy and WIOA Sections 129(a)(1)(B)(iii)(VII) and (a)(1)(C)(iv)(VII). *DWDAL’s policy on the Title I Youth Program can be found here:* <http://www.labor.maryland.gov/employment/mpi/mpi8-15.pdf>.

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.

We shall interpret and document eligibility criteria for in-school and out of school youth in accordance with Maryland 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 including self-attestation, when applicable. We will document eligibility in MWE.

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

Workforce Board defines individuals who "require additional assistance to complete an educational program, or to secure and hold employment" as youth who fall within at least one of the following categories: 1. Is or was in Foster Care; 2. Has been referred to or treated by an agency for substance abuse/ psychological problems; 3. A victim of domestic abuse or violence; 4. Has a currently incarcerated parent(s); 5. Has neither the work experience nor the credential required for an occupation in demand for which training is necessary and will be provided ; 7 Has been fired from a job within the 6 months(or longer if last job) prior to application; 8. Has never held a full-time job (30+ hours per week) for more than 13 consecutive weeks.

We shall interpret and document eligibility criteria for in-school and out of school youth in accordance with Maryland 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 including self-attestation, when applicable. 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, business voice 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 access to the 14 required program elements for the WIOA Youth program design, including whether the Local Board has contracted with youth service providers or not:

1. *Tutoring, skills training, and dropout prevention;*
2. *Alternative secondary school services;*
3. *Paid and unpaid work experiences;*
4. *Occupational skills training;*

5. *Leadership development opportunities;*
6. *Supportive services;*
7. *Mentoring;*
8. *Follow-up services;*
9. *Counseling;*
10. *Concurrent education and workforce preparation activities;*
11. *Financial literacy education;*
12. *Entrepreneurial skills training;*
13. *Labor Market Information (LMI); and*
14. *Preparing for Post-Secondary Education and training.*

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 diploma/GED. We work closely with our community colleges and other training providers to provide in-demand occupational skills training for youth.

Our 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. Staff determines an appropriate track or track 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
  - Work and Learn - may be in conjunction with GED or other occupational skills trainings.
  - 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
  - Labor market information research
  - Job shadowing
  
- **Enrollment in training program**
  - Financial aid training program
  - Registration completed
  - Classes scheduled
  - Earn certificate or credential

The development of the ISS is considered to be the “cornerstone” of the process for serving 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 potential career laddering opportunities.

(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.

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

Our youth population tends to be mainly out of school youth. To insure we meet the 50% 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 youth centric social media. We rely on our community partners to refer youth to our program, for example, we use 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.

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

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 with the 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.

Comprehensive services to business are provided through business service consultants, business resource representatives and the business team. Collaboration is expected to exist among the partners for the enhancement of workforce services, such as, planning, program development and delivery, and business services. As previously mentioned, we support a common intake mechanism amongst partner agencies and hope there will be one common case management system authorized by state partners.

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 will be shared between programs as long as a releasee information is available or the client shares a copy of the assessment results with the partner agency. An individual employment plan may be developed and shared jointly. We may provide joint case management. This avoids duplication and maximizes available services and funding.

We are co-located with Title I, Wagner Peyser, DORS when we are working at the AJC which streamlines the communication process between programs as well as referral and joint case management. Co-location allows us to blend services that are responsive to our customers' needs. Full time partners located at the AJC are scheduled to meet weekly while working virtually and all partners meet quarterly at minimum. TANF staff periodically works at the AJC and Title 1 staff provide AJC overviews to TANF customers at the DSS location or remotely. We will continue to work with our TANF partner to better coordinate our services at the AJCs. AJC staff is already familiar with the TANF program offerings and may assist customers with the on-line TANF/Food Stamp eligibility application. TANF management participates on the WDB and partner meetings. We work closely with the Community Action Agency and cross-refer customers regularly. The CAA will have representation on the WDB and plans to participate in partner meetings and trainings.

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. The same level of partnership continues as we work remotely.

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

We will provide quarterly follow-up services as required for participants who exit the program, for up to 12 months after exit. 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, email, wage records or employer contact. Staff enters 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.

The AJC in Howard County has a collaborative working relationship with Adult Education. 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 provide information on AJC services.

Howard County is currently participating in the Career Pathways Grant for the second time and expects to sustain this innovative project after the grant ends. Due to the success of the first grant, we have been able to increase the access of English Language Learners to Certified Nursing Assistant and/or Patient Care Technician training. A smooth process for recommending and enrolling students developed out of the grant. For the current Career Pathways Grant, we are working with both of our Adult Education partners (Howard Community College and Howard County Library System’s Project Literacy). This grant is focused on English Language Learners who want to become Ophthalmic Technician Assistants. These students are enrolled in an ESL support class along with the Ophthalmic Technician training course. This career was chosen due to the many opportunities for advancement as well as high demand.

Furthermore, students who are contemplating a career in the above career fields will have the option of taking contextualized career exploration classes. These classes will help give prospective participants a chance to improve their English proficiency and learn about the responsibilities, work settings, education and training required, and a career pathway for higher income in the respective field.

The Title II partners along with other WIOA Core partners will meet quarterly to ensure continuing alignment of services. Additionally, the Adult Ed providers meet annually to discuss services and the community college adult ed. providers meet monthly.

Howard County will review applications in accordance with the guidance provided by the Maryland Department of Labor’s Division of Workforce Development’ Office of Adult Education and Literacy Services and will submit appropriate documentation.

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

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

Customer service is very important to the partners in Howard County. We are already addressing alignment to avoid requiring duplicative assessments. We will continue to work together to more closely align adult basic education and English language assessments amongst the other American Job Center partners. We use TABE and CASAS as assessment tools and have agreed to share assessment results. We plan to learn best practices in assessment administration to create a better customer experience. As we “finalize” our assessment procedures, we will develop MOUs to ensure partnership and alignment.

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/County privacy requirements. When needed, we request clients sign a Release of Information so that we can share the scores. A Release of Information is included on applications for workforce-related classes at Howard Community College. To promote customer service and expedite the testing process, partners may accommodate clients needing assessment from the other partner, if the client is appropriate and eligible for the assessment service. The primary partners administering assessments will be the Adult Education and WIOA Title I partners.

Partners will share testing schedules on a regular basis. As the need arises, more structured procedures will be developed to facilitate the coordination of testing. As previously identified, a process has been developed for sharing scores.

HCC will train Howard County counselors once per year or as needed in TABE administration and proctoring best practices. The Adult Ed. provider will also inform the center whenever the training is being held locally for Adult Ed. instructors, in case the workforce counselors need training or a refresher and vice versa.

*DWDAL’s policy on assessments can be found here: <http://www.labor.maryland.gov/employment/mpi/mpi5-20.pdf>.*

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

The Adult Ed. rep will share the meeting schedule and link to the meeting minutes with other Adult Ed. providers. As relevant and necessary, the Adult Ed. rep will engage the other providers in discussion on

local board topics. Board meetings are open to the public and the minutes/schedules are posted on the [www.mid-marylandwib.org](http://www.mid-marylandwib.org) website.

The Adult Ed rep will reach out to other grantees in the workforce area prior to each meeting and encourage them to review any posted agenda or meeting materials on the WDB website, soliciting any feedback or input to share at the meeting. The rep will also encourage the other grantees to review the posted minutes after each meeting to stay informed. The Adult Ed rep will be accessible to other grantees through standard communication channels, such as phone, email, video conferencing, and in-person. The email communications may be shared as documentation upon request.

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

Two Adult Ed grantees currently serve Howard County, providing a range of services to residents and students. Information sharing happens regularly between the AJC and the Adult Ed. partners to ensure staff of all agencies are familiar with the services provided and eligibility requirements, to facilitate cross-referrals and customer service. As the need arises, the potential exists to hold Adult Ed. classes and/or have adult ed represented in the AJC center. The local area will consider involving adult education students, at a specific academic functional level required for participation, in IET programs at the AJC as demand/need requires.

- (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.*

As mentioned previously, Howard County has worked with HCC and Project Literacy to develop a program to train English language learners interested in two positions: Certified Nursing Assistant and Patient Care Technician. Certified Nursing Assistant is an entry-level certification in healthcare – one of the priority industries identified in the Howard County Board’s strategic plan – for candidates with a high school diploma (to work in a hospital). This program is now supported through Title II grant funds.

HCC and Howard County have collaborated to identify occupational training programs as targets for Integrated Education and Training (IET) programs. These targeted programs are on the Eligible Training Provider List (ETPL) and are in industries that are priorities in the Howard County strategic plan. Existing programs offered include Commercial Driver’s License, information support specialist, and bookkeeping. Additional IELCE/IET programs are available at other community colleges and HCC can refer students to the appropriate training program (for example, Central Sterile Processing at Anne Arundel Community College)

## **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 Howard 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 where group orientations may be facilitated by a multi-partner team, in-person and/or remotely; a common resource area; common job search or job related workshops; technology linkage; sharing of information, resources, and staff; joint case management and funding; combined staff meetings, integrated program planning and trouble-shooting; consolidated business team functions, and a unified commitment to the Maryland Workforce Exchange.

1. Howard County's Business Service team work to provide a comprehensive "demand-side" service approach to the business community. The core team is WIOA Title 1, WP, DORS, RLVER and the WDB expects collaboration amongst the partners . Depending on the type of service, a representative of the local community college, Rapid Response, DSS, and others may also participate. The local team works together and the Board expects that any regional representatives will coordinate with the local area when reaching out to businesses and actively participate on the team and local business service team/management meetings. We see this collaboration as a way to help reach the fifth goal in the Benchmarks for Success. 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>*

In Howard County, Wagner-Peyser Staff conducts outreach activities for our area. If a migrant seasonal farm worker is identified they are contacted and told about the services available and provided information on 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: <http://www.labor.maryland.gov/employment/mpi/mpi4-18.pdf>*

The Rural Services Coordinator conducts MSFW housing inspections for our area. They MUST follow ETA requirements described in 20 CFR §654 Subpart E, found at [www.gpo.gov/fdsys/pkg/CFR-2003-title20-vol3/pdf/CFR-2003-title20-vol3-part654-subpartE.pdf](http://www.gpo.gov/fdsys/pkg/CFR-2003-title20-vol3/pdf/CFR-2003-title20-vol3-part654-subpartE.pdf). 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 disabled job-seekers;
- Promote employment of persons with disabilities;
- Based on a comprehensive assessment of an individual's disabilities, determine an individual's eligibility for services in accordance with the Division's Order of Selection criteria;
- Develop an Individualized Employment Plan;
- Provide guidance and counseling, physical restoration, and training to eligible persons with disabilities;
- Provide follow-up services to enhance job retention;
- Provide other services as may be available and appropriate;
- Provide Pre-Employment Transitioning Services for students with disabilities, as defined by WIOA;
- Provide Supported Employment Services for **youth and adults** with disabilities as defined by WIOA;
- Provide independent living services to enhance the capacity of persons with disabilities to live unaided in the community;
- Provide performance information as required by WIOA;
- Provide cross-training of workforce staff on disability related issues;
- Provide technical assistance on disability related issues and on assistive technology;
- Engage employers through the Division's Business Services Representatives ;
- Work in a collaborative manner to coordinate services among the Workforce Partners for **youth and adults** with disabilities.

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

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 is co-located in the Howard County 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+. Partner managers have been meeting virtually on a regular basis during the pandemic to share program updates and plan for service provision and will continue to do so. DORS customers participate in Center activities including workshops, job fairs, local recruitments and apprenticeship events, and year-around and summer youth employment program.

## Section 9 – Temporary Assistance for Needy Families Functions

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

- Eligibility,
- The range and sequence of services,

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

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

This Section should include –

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

We have received the implementation timeline from DHS and are in the third phase. However, we have been and will continue to work locally to serve the TANF customers. 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 are very hopeful that this will be resolved at the state level. TANF 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 DSS and DSS staff are co-located part-time at the AJC. We partner to provide orientation and employment services to the DSS participants both virtually and in-person. Services provided will include 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. We meet regularly amongst partners to keep the communication open for enhanced service delivery. During the pandemic all of the above is done virtually.

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

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

We expect to continue our enhanced partnership with our local DSS. Many of the Core partners serve on multiple community boards together. Much of the intent of these boards is to share information. The LDSS and LWIOA in Howard County have staff co-located at the Howard County Multi-Service Center along with many other community partners; This includes the Disabled Veterans Outreach Program and others that serve economically disadvantaged individuals. The local DSS office periodically provides staff at the

AJC. Through working together, we are able to coordinate services and create a more seamless system. The local AJC and local DSS are collaborating to develop strategies to maximize services to TANF customers and streamline communication. Staff meet regularly to orient customers to the systems.

We cross train partner staff to share knowledge, promote commonalities across partners and expand direct-services options available for customers. This will provide for consistently accurate information and that time spent at each agency is value added. The Title 1 and TANF provider work together to provide services via technology while we work remotely.

The LDSS will provide a list of WPR “countable” activities to partners, particularly the AJC staff, to increase the understanding of what is allowable. In Howard 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 not the program that provides them support. 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 staff. This will continue to be an ongoing practice. We support the single-point of entry concept and share information.

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

- (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.

Historically, the WDB has had TANF representation on the Board to represent TANF expectations and we plan to continue to do so. The TANF vendor also attends WDB and partner meetings which allows for increased partnership with the vendor and DSS management.

- (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 DSS to refer TANF recipients and exiters to the appropriate WIOA partner program most able to provide skills and credentialing, life management skills, and employment. The partners will work together to improve the financial status of those exiting the TANF program.

As part of our strategy DSS will refer youth, aging out of foster care, remaining in Howard County to the Title 1 youth coordinator. Title 1 will work with the youth to assist them with progressing with the workforce development and employment skills with the goal of them working toward self-sufficiency.

## 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: <http://www.maryland-cap.org/member-map.aspx>.*

Community Action Council of Howard County  
9820 Patuxent Woods  
Columbia, MD 21046  
Bitia Dayhoff, Director, [bdayhoff@cac-hc.org](mailto:bdayhoff@cac-hc.org)

Community Action Council of Howard County (does not receive funding for the employment and training portion of the CSBG)

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

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

The Community Action Council and AJC are already referring individuals between programs based on the need of the customer and plan to continue. As of this writing, both offices are working virtually due to the pandemic. Once we are all back on-site, workforce development staff may provide services at the CAC facility. We have planned for Howard County workforce staff to present information on available services to the CAC team, and will request CAC to do the same at a partner's meeting. The presentation about services will be provided to multiple people to expand referrals. The AJC and CAC in Howard County work together to support workforce needs of 2-gen customers. We plan to include the CAC in partner meetings and trainings where we address services to businesses and individuals. They are included on recruitment distribution lists so that business services/events/recruitments are available to their participants. There is a County multi-service center which hosts various human services agencies and AJC and CAC staff work closely there to serve customers.

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

The Howard County CAC is providing a representative to the local board.

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

**Customer Service Flow for Veterans**

AJC staff provides core services and initial assessments to veterans.

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

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

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

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

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

### **Verifying Veteran Status**

Any individual **self-identifying** as a covered person should be **provided immediate priority** in the delivery of employment and training services. It is neither necessary nor appropriate to require an individual self-identifying as a veteran or eligible 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 Priority of Service for career services, covered persons may **self-attest** their veteran or eligible spouse status.

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

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

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

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

If a Veteran meets the definition of a dislocated worker, then 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.

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.

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

### **Section 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:  
<http://www.labor.maryland.gov/employment/mpi/mpi11-19.pdf>.

USDOL's Trade Adjustment Assistance Final Rule can be found here:  
[https://www.dol.gov/sites/dolgov/files/ETA/tradeact/pdfs/TAA\\_Final\\_Rule\\_1205\\_AB78.pdf](https://www.dol.gov/sites/dolgov/files/ETA/tradeact/pdfs/TAA_Final_Rule_1205_AB78.pdf).

This Section should include –

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

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 as applicable. 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.

Services include training, employment, case management, job search and relocation allowances, Trade Readjustment Allowances (TRA), and Reemployment Trade Adjustment Assistance (RTAA). Title III staff meets with participants face-to-face and/or virtually, 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.

- (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.

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

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 allow for more an efficient use of public workforce system resources and reduce barriers to program integration.

Title 1 and Title III will work together to serve the participant. 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 is currently managing the bi-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 in the center and submitting UI appeal request documents. There are UI and Workforce liaisons in headquarters to assist with more complex UI claimant issues. Title I staff, participate in RESEA and ROW workshops to provide an overview of local workforce development services, including career and training services. Participants are encouraged to access all resources available through the AJC.

- (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.

See 13 (A)

### 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. is the National Grantee and utilizes sub-grantees to implement SCSEP. In Howard County the sub-grantee is:*

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, has been building pathways to employment for our low-income, older job seekers. The Center operated the Senior Community Service Employment Program. (SCSEP). SCSEP is a job training program for eligible 55 years old and older Baltimore County residents. Participants are paid minimum wage for 20 hours per week 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 Center. 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 SSAI 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 AJCs will continue to serve as host sites and refer appropriate individuals to the program. A SCSEP office is not located in Mid-Maryland, therefore, our SCSEP participants serve as representatives of the SCSEP program and provide services. Each AJC has a SCSEP participant working in the resource center/front desk.

The Senior Community Service Employment Program (SCSEP) is not physically located in the American Job Centers in Howard County. However, Howard County has had a long-term relationship serving as a host to many SCSEP participants. AJC staff train SCSEP participants to provide assistance at the front desk and in the resource area. SCSEP participants also provide basic eligibility screening for age-eligible 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 participants to the AJC for job search assistance and training classes as needed dependent upon the participants’ respective Individual Employment Plans.

## Section 15 – WIOA Section 188 and Equal Opportunity Functions

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

It is 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.

Shelia Little, Supervisor  
Howard County Office of Workforce Development  
7161 Columbia Gateway Drive, Suite D  
Columbia, Maryland 21046  
Slittle@howardcountymd.gov  
410-290-2620

(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 AJC is located in a state government facility and is regularly assessed for ADA compliance to ensure nondiscrimination and equal opportunity for individuals with disabilities and Limited English Proficiency in the administration of programs and activities. Individuals with disabilities are served through the same channels as individuals without disabilities, receiving reasonable accommodations, modifications, and auxiliary aids and services, as appropriate. Assistive technology and workstations are periodically assessed for upgrades based on customer needs.

We are co-located with DORS and partner with multiple organizations that serve individuals with disabilities. We will continue to partner to provide staff training based on regular and ongoing assessment of AJC program staff knowledge and experience serving individuals with disabilities to ensure universal access to services and activities. We will also focus on nondiscrimination/equal opportunity, including training on topics such as confidentiality, privacy, disclosure of disability, and the full range of other relevant topics.

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 the language line, which is an over the phone interpretations service, as appropriate. In order to assist the customer, we will provide in-person interpreter service. We also follow county specific policies related to translation and interpretation.

One of the responsibilities of the One-Stop Operator is to ensure Section 188 compliance.

(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 sub-recipients may be subject to the above requirements.

(D) A description of how the Local Board will ensure meaningful access<sup>6</sup> to all customers.

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<sup>6</sup> The Equal Employment Opportunity Commission provides an example of “meaningful access” as it relates to language access for individuals with Limited English Proficiency as “Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior compared to programs or services provided to English proficient individuals,” available at: <https://www.eeoc.gov/eeoc/plan/lap.cfm>.

Howard County is committed to ensuring customers have meaningful physical and programmatic access to services including those individuals with disabilities and those with limited English proficiency. When individuals come into the AJC they are triaged to determine services that will be most meaningful for them. AJC staff is aware of all available access points for supportive services. We are lucky because DORS is co-located in our AJC and assisted with the design of the AJC to enhance services to customers, including those with disabilities. We have upgraded our assistive technology to meet customer needs and will continue exploring the use of enhanced technology to serve individuals who cannot physically get to the Center. Staff will go to other organizations to provide services such as: homeless shelters, halfway houses, detention facilities, the Multiservice Center and others when it is difficult for customers to get to the workforce centers. During the pandemic, we are providing access to customers remotely and exploring ways to provide access to technology to those who do not have it.

(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 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:
  - Complainant's name and address, or alternate means of contact
  - Identity of the individual or entity that the complainant alleges is responsible for the discrimination
  - 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
  - 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 Howard County 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.

- 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 Howard County WIOA Director 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 DLLR 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 1.
- Suspension or termination of payments to or contract with an employer who has violated any requirement under WIOA Title 1.
- Efforts toward reinstatement of an employee when applicable.
- Other equitable alternatives.

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. We comply with all relevant federal, state and local laws governing grievances and complaints,

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

Individuals with disabilities, including those who are deaf or blind, may request auxiliary aids and services. For accommodations in Howard County, please contact Stephanie Hill at [shill@howardcountymd.gov](mailto:shill@howardcountymd.gov)/410-290-2620, or MD Relay 711. This information is on all public correspondence.

(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.

We provide universal access and will provide reasonable accommodations to qualified individuals. We comply with our County Government Equal Employment Opportunity and ADA requirements. The Howard County code describes the hiring preference for individuals with disabilities. The county has staff dedicated to coordination of the ADA and assist with assuring compliance. Additionally, AJC documentation has a notice of accessibility on it and the information for whom to contact to arrange accommodations.

Howard County's workforce development area's written materials contains 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 Howard Government. Auxiliary aids and services are available upon request to individuals with disabilities. For accommodations in Howard County, please contact Stephanie Hill at 410-290-2620, or MD Relay 711

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

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

Please see Section 13 (B)

- (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.

We follow County policies and procedures to ensure effective communication with individuals with disabilities, including individuals with visual or hearing impairments. We use the state, county and local resources to assist us so that our communication with the above-mentioned individuals is as effective as communication with others. Specific steps to follow are prescribed to ensure effective communication. For example, staff may use the Maryland Relay service, TTY or sign language interpreters. As appropriate, we may use written notes, assistive listening devices, email, videos or translation services. The resource centers are equipped with accessible workstations that were upgraded recently. Additionally, we will access our DORS partner resources, as appropriate.

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. In Howard County, the process is handled through the direction provided in the Howard County Limited English Proficiency Implementation policy. Additionally, we may follow the state LEP policy.

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 Howard County Government. Auxiliary aids and services are available upon request to individuals with disabilities. For accommodations in Howard County, please contact Stephanie Hill at 410-290-2620 or MD Relay 711 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 Howard County Government 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 the language line which is an over the phone interpretations service, as appropriate. In order to assist the customer, we will provide in-person interpreter service. We also follow county specific policies related to translation and interpretation. When meeting with a customer remotely we use telephone interpretation. Outreach material is provided in Spanish.

Howard County government has a separate procedure to file complaints with the county. The link for the County policies/procedures is:

<https://www.howardcountymd.gov/LinkClick.aspx?fileticket=N4u0MhJuXew%3d&portalid=0>  
<https://www.howardcountymd.gov/Departments/County-Administration/Human-Rights/How-To-File-A-Complaint>

See Howard County policy attached

## **Section 16 – Fiscal, Performance, and Other Functions**

This Section should include –

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

Howard County Government Office of Workforce Development

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

The AJCs in Howard County is financially stable based on current funding levels and the current resource sharing agreements. Should levels change, we will examine all options, evaluate impact, and adjust our budget and services accordingly.

- (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(s) procurement processes to award competitive subgrants and contracts. Howard County government has a procurement office with procedures in place to award competitively bid contracts. Award thresholds are as follows:

### **Procurement Procedures**

Depending on the amount of the purchase, Howard County Government uses different procurement methods:

**Procurement Card (\$10,000 or less)**

**Informal Quotes (\$10,001 - \$29,999)**

**Formal Bids (\$30,000 and over)**

We will use our internal risk assessment matrix as part of the evaluation of competitive bids. This tool provides a rating system for low, medium and high risks. (Attachment A)

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

Howard County 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. Howard County'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 Howard County board review 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 for businesses and job seekers and respond with solutions to areas needing improvement. For many years we have been using 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. We will focus on delivering services equitably and use data-informed decision making.

WDB members will participate in the development of policies. The WDB will actively participate 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 Director or designee to handle day-to-day operations, policy creation 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 *found at:* <http://www.labor.maryland.gov/employment/mpi/mpi9-17.pdf>.

Howard 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, together participants and staff will determine the need for an ITA. The training emphasis will be in response to local/regional labor market needs, specifically in high growth, high 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 in-demand 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 Howard County will support the training, even if it is not on the ETPL or is not a priority industry.

(COVID impact ie does not want to work in healthcare because of contagions, retraining even it if it is for income maintenance during pandemic)

ITA limits on duration and value are established based on the participant's needs and circumstances, funding availability, 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. Howard County 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 Howard County, 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 who approves it based on the 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.

We will ensure customer informed customer choice by discussing options with the customer. Together the customer and counselor determine the best training option for the customer. 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/or 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 or class-sized training. Howard County plans to

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, if there is an OJT in conjunction with classroom training then the training provider and business hosting the OJT may be included in an agreement. Howard County has not traditionally used customized training; however, we will leave that option available to support businesses. Howard County has established both ITA and OJT guidelines and policies outlining the process and minimum requirements.

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

The Maryland Workforce Exchange (MWE) is used as the primary tool by Title 1 and Wagner Peyser staff to provide and track services for 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; they receive this assistance either in person or remotely. Job seekers use the MWE to search and apply for available positions, labor market information, education and training options, and career and workforce information. Businesses use MWE to post their jobs, search the resume database for qualified applicants and utilize labor market information tools.

Staff uses MWE to assist job seekers with registration, job search, career information, and labor market information. Staff completes the WIOA program enrollment applications, tracks services and documents program participation through case notes. MWE is used to produce reports for staff and management to ensure quality and performance. Staff provides 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. [DWDAL's policy on monitoring can be found here: http://www.labor.maryland.gov/employment/mpi/mpi7-19.pdf](http://www.labor.maryland.gov/employment/mpi/mpi7-19.pdf). The monitoring plan shall address the monitoring scope and frequency and shall include the following:

- The roles and responsibility of staff in facilitating this procedure;
- A requirement that all subgrantee agreements and contracts be monitored at least annually;
- Procedures for determining that expenditures have been made against the cost categories and within the cost limitations specified in the Act and WIOA regulations;
- Procedures for determining compliance with other provisions of the Act and regulations and other applicable laws and regulations, including the method of monitoring to be used for subgrantees and contractors;
- Monitoring risk factors and risk assessments;
- Provisions for the recording of findings made by the recipients' monitor(s), the forwarding of such findings to the subgrantee or contractor for response and the recording of all corrective actions;

- Provisions of technical assistance as necessary and appropriate; and
- Specific local policies developed by the Local Board for oversight of the American Job Center system, youth activities and employment and training activities under Title I of WIOA

Howard County has a sub-recipient monitoring policy Oversight and monitoring of WIOA activities of subgrantees and contractors will be performed to determine compliance with regulations and WIOA rules. Program, fiscal staff and/or a contractor will provide oversight and/or 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.

As notated in section 10 (c), Howard County WDA follows a monitoring process in compliance with the Sub-recipient policy. Monitoring is required at least annually.

- Howard County 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.

Howard County staff will communicate regularly with subgrantees and contractors. As part of the Cost Allocation Plan, Howard County WIOA (WDA) reviews updates to regulations and adjusts as necessary. Notification of updates may come from multiple sources, including but not limited to; fiscal and MWA meetings, communication from the Maryland Department of Labor, communication from the US Department of Labor, communication from the OMB.

Depending on need and circumstance we may use a combination of desk review and on-site monitoring. Findings are recorded will be communicated to the subgrantee 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.

- 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 Howard County Case Management and Monitoring policies.

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  
 COVID-19 Interim policy

In areas where the Board does not have an existing policy Howard County uses the Maryland Department of Labor and/or US Department of 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. *DWDAL's policy on privacy and data security can be found here: <http://www.labor.maryland.gov/employment/mpi/mpi4-19.pdf>.*

- Howard County follows the Department of Labor Training and Employment Guidance Letter No. 39-11; Guidance on the Handling and Protection of Personally Identifiable Information (PII), Maryland Department of Labor's PII policy and Howard County Government's SS# policy. All PII is kept in locked filing cabinets, closets or other locked areas and accessible only to staff needing such information. Electronic files are 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. The table below outlines which entities need to be notified, by type of program, in the event of a breach:

#### Workforce Program

- For WIOA Title I, Local Area Director;
- For WIOA Title III, Labor Exchange Administrator;
- MDOL DWDAL Manager of Monitoring and Compliance;
- MDOL DWDAL Director of Office of Workforce Information and Performance, where applicable;
- and
- Affected customers/employees.
- MDOL Director of Workforce Development
- GWDB Executive Director
- Howard 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
- Howard County will complete an incident report and corrective action as indicated in MDOL Policy Issuance 2019-04. In addition to the above Howard 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.

We follow County Government's procurement systems. Howard County 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 Howard County Purchasing manuals, the Howard County Purchasing manual indicates how to award an emergency contract (Section 4.111). 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.

[https://www.municode.com/library/md/howard\\_county/codes/code\\_of\\_ordinances?nodeId=HOCOCO\\_TIT4CO\\_PUPR\\_SUBTITLE\\_1PU](https://www.municode.com/library/md/howard_county/codes/code_of_ordinances?nodeId=HOCOCO_TIT4CO_PUPR_SUBTITLE_1PU)

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

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 Howard County Government's Purchasing manuals and policies.

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 for Howard County Purchasing,

[https://www.municode.com/library/md/howard\\_county/codes/code\\_of\\_ordinances?nodeId=HOCOCO\\_TIT4CO\\_PUPR\\_SUBTITLE\\_1PU](https://www.municode.com/library/md/howard_county/codes/code_of_ordinances?nodeId=HOCOCO_TIT4CO_PUPR_SUBTITLE_1PU)

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

The Howard County Board has a conflict-of-interest policy that each board member must sign. It includes conflicts related to the awarding of contracts.

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

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

The Accounting procedures for Howard County are prepared in accordance with Generally Accepted Accounting Principles (GAAP). Through a combination of specially designed Excel worksheets, the Howard

County SAP 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. The County accounting system utilizes a Microsoft Excel based format for tracking and compiling all financial information of the Howard County 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 Director and the WIB.

On a monthly basis, the Howard County Department of Finance's Detail Listing of Obligations vs. Budget and the Trial Balance are reviewed and reconciled with OWD accounting records. After all transactions have been reviewed and adjusted for any corrections (through journal entries) the accounting system is ready to begin report preparation.

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

- Howard County Office of Workforce Development: Ji Mar, Fiscal Manager
- Francine Trout, Director, Howard County Workforce Development Area

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

A detailed Cost Allocation Plan (CAP) is used detailing allowable and non-allowable costs as well as appropriate categorization of costs. Howard 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. Howard County prepares the reports and sends them to MDOL.

(P) A brief description of the following:

- **Fiscal reporting system,**  
Howard County's fiscal reporting system uses Microsoft Excel, and SAP 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. Also, each funding stream has its' own obligation control Excel file. 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.

- **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 against the Obligation Master Control Log as referenced above. Verification of the accuracy of client name, training name, dates of training and dollar amount of training is completed by the Fiscal Manager.

Once verification is completed, the invoices are entered into the County's SAP Financial system to start the payment process. All entered invoices are routed to management for review and approval in the SAP financial system. Prior to approval, the invoices are verified by staff in the MWE system for authorization and validity of the invoice. Processing of check disbursements and mailings to training institutions are completed by the Accounts Payable Department in the County's Finance office.

- **Chart of account system,**

Howard County uses the Chart of Account System as created and maintained by the County Finance Department.

- **Accounts payable system,**

County Finance offices use SAP financial systems.

- **Staff payroll system,**

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

Howard County staff submits time, bi-weekly, to an automated electronic payroll system called, Kronos is then reviewed and approved by the supervisor electronically.

Along with Kronos, OWD staff submits bi-weekly paper timesheets coded to the grant funding in accordance with the allocation of time spent on the grant activity in the respective funding stream.

All paper timesheets are certified to be accurate by the staff person and manually approved by management. These timesheets serve as the source documentation for recordation into the payroll allocation spreadsheet. This spreadsheet contains algorithms to translate the hours spent for each individual staff member to the appropriate funding stream in accordance with hours documented on the timesheet.

We use the same payroll system for participants as for staff payroll .

- **Participant stipend payment system.**

Howard County does not use a participant stipend payment system at this time but may in the future.

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

We do not maintain any physical custody of cash assets or checks. 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.

Howard County WIOA operates on a reimbursement basis. The cash requisitions are based on reimbursement for actual expenditures already incurred.

Upon receipt of the revenues (reimbursed expenditures) from MDOL by ACH deposit, the County Cashier's office notifies the fiscal manager of the ACH deposit. The Fiscal manager then provides the Cashier's office with the deposit information, appropriate grant info and ID. The cashier's office deposits and provides receipts to the fiscal manager. The fiscal manager reconciles funds received to the requisitions submitted.

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

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

Howard County WIOA follows the below Cost Allocation Plan Procedures:

**Howard County 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	Program/Administrative
Training workshops	Program
Work experience coordination and oversight	Program
Workforce Development 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 the Howard County are:

- 1) Salaries
- 2) Fringe
- 3) Benefits (health insurance, retirement)
- 4) Training for participants
- 5) Supplies
- 6) Data Processing
- 7) Telephone

8) Mileage/Travel

9) Meeting

10) Copier

Costs beyond the categories listed above are discussed by the WIOA Director, or designee and 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

3) Training for participants

4) Supportive Service

5) Mileage/Travel

6) Supplies

**Indirect Cost Plan:**

**The basis for allocation for indirect costs for Howard County** is staff salary distribution as documented by employee timesheets. Indirect costs are those costs where a clear specifically identifiable benefit area may not be easily determinable for each cost incurred. Indirect costs allocated to Howard County from the County Government include:

1) Data processing

2) Health insurance

3) Telephone

4) Copier

5) Meetings

**Allocation Basis: Staff Salary Allocation:**

Howard County uses an Excel based spreadsheet for the allocation of costs to the benefiting cost objectives. Howard County *does not* base allocations on projections, funding amount or budgetary data. All allocations are performed using the basis of staff time allocation. Actual time worked as reported on the employee timesheet approved by supervisor is used as the source documentation for the allocation of salary. Administrative/Other amounts charged are re-allocated based on the percentages of time allocated to program. 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 service costs charged from the County and office supplies. Staff costs benefiting multiple programs at the AJC are allocated based on customer counts. The MDOL American Job Center Labor Exchange Administrator 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:**

**At least quarterly** if not monthly, 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 OWD County funding.

#### **Validation and Updates:**

This Cost Allocation Plan is reviewed at least annually by the Fiscal Manager and the Director of Howard County 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.

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

Howard 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 ID 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.

## 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
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	2.	The final Local Plan is available and accessible to the general public.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	13.	The Local Board ensures that outreach is provided to populations and sub-populations who can benefit from American Job Center services.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	15.	The Local Board complies with the nondiscrimination provisions of Section 188, and assures that Methods of Administration were developed and implemented.
<input checked="" type="checkbox"/>	16.	The Local Board collects and maintains data necessary to show compliance with nondiscrimination provisions of Section 188 of WIOA.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.

<input checked="" type="checkbox"/>	22.	The Local Board ensures compliance with the uniform administrative requirements under WIOA through annual, on-site monitoring of each local sub-recipient.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	25.	The Local Board will not use funds received under WIOA to assist, promote, or deter union organizing.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	31.	The Local Board will provide reasonable accommodation to qualified individuals with disabilities unless providing the accommodation would cause undue hardship.

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

\_\_\_\_\_  
Local Chief Elected Official(s)<sup>7</sup>

\_\_\_\_\_  
Date

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

\_\_\_\_\_  
Date

<sup>7</sup> Additional signature lines should be added to accommodate Local Areas that require more than one local chief elected official signature.