



WORKFORCE INVESTMENT ACT

LOCAL WORKFORCE INVESTMENT UPDATED FIVE-YEAR PLAN (PY 2009)

ANNE ARUNDEL COUNTY, MARYLAND

Prepared by
Administrative Entity/Sub-grant Recipient

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Local Workforce Investment Five-Year Plan (PY2009)
Anne Arundel County, Maryland

III. GENERAL NARRATIVE

A. WIA ORGANIZATION

Grant Recipient

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B. TITLE I OPERATIONAL AREAS

1. Collaborative Local Labor Market Plan

Historically, Anne Arundel County has maintained one of the strongest economies in the State. While this County has been affected by the economic downturn that has affected the rest of the State and the country, Anne Arundel County's unemployment rate remains below the State and national average. The County's unemployment rate has increased from 3.6% in 2006 to 6.3% in March of 2009 – while a sizeable increase, still significantly below the Maryland average of 7.0% for March of 2009. Employment in the County actually increased by 1,101 workers from the third quarter of 2007 compared to the same period in 2008.

However, Anne Arundel County reported 17,399 workers remained unemployed as of March of 2009. Major worker dislocations have occurred in the retail, manufacturing, and banking industries.

In the third quarter of 2008, the County's average weekly wage for all jobs was \$891; the average weekly wage for government jobs was \$1,021. Key private sector employers (100+ employees) include: ARINC, Booz Allen & Hamilton, Anne Arundel Medical Systems, Computer Sciences Corporation, General Dynamics, Lockheed Martin and Northrop Grumman.

Anne Arundel County's highest private employment concentration, identified by Anne Arundel Economic Development Corporation, represents the following sectors: Professional/Business and Technical occupations, Hospitality/Leisure/Tourism, Education and Health Services, Construction, Manufacturing, Financing, Information, and Trade, Transportation, and Utilities. In addition, government is a major employer in the County, accounting for 15.7% of total employment.

Despite the rising unemployment rate, some current industries face a workforce shortage. Healthcare, especially the areas of nursing, physicians, and allied health, continues to struggle to fill openings. Science, Technology, Engineering and Math Skills (STEM) are in short supply and this shortage will grow as technical jobs generated by BRAC move to the area. There are critical shortages in education, not only in STEM fields, but in special education, English for speakers of other languages, and career and technology education. Considerable demands continue to exist in hospitality/tourism, construction (related to BRAC and several other planned major projects), public service and manufacturing. It is essential that newly emerging fields such as energy/renewable energy and green technology are addressed.

Current and anticipated development projects in the County reinforce these growth areas. In spite of recent retail closures, retail expansion in the Annapolis area is moving forward with the opening of the Annapolis Towne Center. The first businesses opened in October 2008, and openings are continuing at a steady pace. The Arundel Mills area continues to grow. The Odenton Town Center is in the planning stages. The relocation of the International Union of Painters and Allied Trades to Hanover will bring 300 construction-related jobs to the area.

The BRAC process occurring at Fort Meade greatly impacts Maryland's workforce systems. BRAC is expected to add 5,700 direct jobs to the Fort Meade area, including Defense Information Systems Agency (DISA), Defense Media Publications (DMA), and the Adjudication and Office of Hearing and Appeals Offices. Personnel who are relocating are highly educated but also will continue to require training and education for upgrading skills. To support the BRAC influx, more middle and high-level technically skilled workers must be recruited or trained. Additionally, Federal agencies already located within Anne Arundel County, such as the National Security Agency (NSA), are anticipating growth.

AAWDC will target the following industries and skills areas: Aerospace/Defense, Information Technology, Construction, Transportation/Logistics/Cargo, Healthcare, Retail Trade, Hospitality/Leisure/Tourism, Manufacturing, Business Services, Education, and Federal Government/Federal Contractors. At the same time, AAWDC will continue to further refine its awareness of the specific skill gaps and business needs in the County by surveying businesses to identify anticipated hiring, the business perception of the availability of skills among the existing labor pool, and the availability of training opportunities to fill those skill gaps. This information will be the basis for training opportunities provided to County job seekers.

Partnerships among education, economic development and employment in Anne Arundel County have created a continuum of opportunities to move the future and current workforce towards economic growth and prosperity. Each County high school is establishing a signature program to focus awareness and learning on growth industries. Two schools have been designated as STEM magnet schools. Anne Arundel Community College, recognized nationally as leader in post-secondary education, continues to provide and create certificate programs and partnerships with four-year institutions in growth industries.

Through its One-Stop operations, WIA funding provides Adults and Dislocated Workers with a wide variety of skill development options and a comprehensive inventory of training providers. Information on high-growth and high-demand occupations will be available to all job seekers in the One-Stop Career Centers. Resources for skills training will be focused on the State's and local area's greatest labor market demand.

In addition to ongoing activities funded by the Workforce Investment Act of 1998, enhanced services funded through the American Recovery and Reinvestment Act (ARRA) of 2009 will address the increased need for services resulting from the current state of the economy. Training

options will expand; outreach will ensure that more County workers have access to training and other services. Activities in response to the ARRA of 2009 are described in Attachment 13.

2. Local Area Governance (LWIB)

(a) LWIB Role

- (1) The WIB will be actively involved in developing the Local Workforce Investment Plan and conducting oversight of the One-Stop system, youth activities and employment and training activities. Under the direction of the WIB chairman, the WIB will review and approve the Local Workforce Investment Plan. The public will have the opportunity to comment on the Plan prior to the Plan's submission to the Department of Labor, Licensing and Regulation. The WIB will achieve its oversight goals by operating in committees. The Youth Council is a subcomponent of the WIB and will make recommendations to WIB regarding youth activities and services.
- (2) AAWDC, a quasi-public, non-profit, 501(c) 3 organization, is the direct successor to the Business and Workforce Development Center (BWDC), a private, non-profit 501(c) 3 organization which qualified for grandfathered-designation as a One-Stop Operator by virtue of having operated a One-Stop Center as a part of Maryland's CareerNet system prior to August 7, 1998. As BWDC's descendent, AAWDC is designated by Anne Arundel County, Maryland, and the Anne Arundel County Workforce Investment Board as the County's One-Stop Operator. (Attachment 12, CLEO/WIB Agreement, affirms that AAWDC is the direct successor to BWDC.)
- (3)
 - (a) The WIB Chairman appoints the Chairman for the Youth Council, which will serve in an advisory capacity to the WIB. The Youth Council will annually submit to the WIB for its consideration the names of youth service providers who have agreed to serve eligible youth as defined in the Act, Section 101(13), and will recommend performance standards to the WIB for approved youth service providers.
 - (b) The WIB will annually recommend eligible providers of Adult and Dislocated Worker intensive and training services based on following criteria.
 - Their inclusion on the State list of eligible training providers;
 - Their status as an approved post-secondary or apprenticeship program;
 - Their relatedness to occupations in demand;
 - Their prior performance and accountability;

- Their costs in relation to locally determined tuition parameters;
 - Their willingness to accept and be governed by locally established timelines or conditions and WIA regulations; and
 - Their fiscal stability and responsibility.
- (c) Intensive services will be provided by the One-Stop Operator; and, when most appropriate, through contracts or as in-kind arrangements with such public, private, and non-profit service providers as have been approved by the WIB.
- (4) AAWDC, as staff to the Anne Arundel County WIB, will develop a budget for carrying out the duties of the local board. The budget will be developed with input from the WIB. The WIB will also review the budget and expenditures at each quarterly meeting.
- (5) The Anne Arundel County WIB:
- Will agree to those core indicators of performance which apply to all local workforce investment areas statewide under Section 666.100;
 - Will review State adjustments made to set specific performance levels on core indicators for Anne Arundel County for reasonableness, accuracy, and equity; and
 - Will not elect to add additional local performance measures to those mandated under WIA Title I for Adult, Youth, and Dislocated Workers; Title II Adult Education and Literacy; and Title I of the Perkins Vocational and Technical Education Act.
- (6) The WIB supports as one of its goals the development of an enhanced system of labor market information, which will benefit both the employer and job seeker communities. To that end, all partners in Anne Arundel's One-Stop system will actively participate in developing a statewide employment statistics system by participating on appropriate task forces and work groups, supplying such local labor market information as is available, and collecting such data as may be required to supplement State data collection efforts to the extent that such requirements are reasonable and practical.
- (7) Coordination of WIA workforce activities with economic development strategies is a priority WIB objective. AAWDC and its partners will advance this objective through mutual participation on work groups and task force initiatives devoted to major workforce challenge areas, such as transportation, school-to-work, skills development, or incumbent workers. Currently, AAWDC maintains active partnerships with numerous regional entities that investigate and promote solutions to local and regional workforce problems. A sampling of these partnerships includes: Anne

Arundel Economic Development Corporation, Arundel Community Development Services, Anne Arundel Community College, the Baltimore Washington Corridor Chamber of Commerce, the BWI Partnership, the Fort Meade Alliance, Anne Arundel County Government, and the Annapolis and Anne Arundel County Chamber of Commerce.

3. Local Board Staffing

Staff services to the Anne Arundel County WIB will be accomplished by AAWDC staff. These personnel are hired and supervised by AAWDC, acting in its capacity as administrative entity. Key positions include AAWDC President and CEO, Director of One-Stop Services, Chief Financial Officer, Coordinator of Youth Services, and Management and Information Systems Coordinator. As an entity, the WIB will not be responsible for the provision of any WIA services and training.

4. Youth Council

- (a) The Youth Council will work with the area Local Management Board and Local Labor Market Team to ensure that youth activities under their respective purviews are complementary and not duplicative. In order to accomplish this, they will nominate for membership on the Youth Council members of their bodies who have policy-making authority.
- (b) The Youth Council will develop a vision and mission statement and a goals statement for the WIB's consideration, which advances the long-term youth strategies addressed in the WIB's five-year strategic plan.
- (c) The Youth Council will propose a survey of existing programs to explore the feasibility of greater integration of services. It will recommend eligible youth service providers based on a review of performance indicators from State guidelines.
- (d) The Youth Council will oversee and monitor WIA funded youth programs regularly, at a minimum annually, based on a review of standard MIS performance reports and site visits, and will present or recommend corrective actions to the WIB for its review.

(5) One-Stop System for Service Delivery

- (a) In an effort to improve efficiencies and leverage resources, One-Stop services are provided by consolidating staffs of AAWDC and Wagner-Peyser staff employed by DLLR, Division of Workforce Development. Consolidated staffs are assigned to three full-service One-Stop Career Centers and to the extent possible at the satellite One-Stop offices. These One-Stops Career Centers are as follows:

Henry L. Hein Municipal Center
 7480 Baltimore-Annapolis Boulevard, Suite 100
 Glen Burnie, MD 21061
 PH: 410-424-3240
 FAX: 410-508-2002
 Lead Agency: DLLR Division of Workforce Development
 (Comprehensive)

Sales and Service Training Center
Arundel Mills Mall
7000 Arundel Mills Center
Hanover, MD 21076
PH: 410-777-1845
FAX: 410-799-4411
Lead Agency: Anne Arundel Community College
(Full-service)

BWI Thurgood Marshall Airport
Main Terminal Building
Second Floor Ticket Counter
BWI Airport, MD 21240
PH: 410-684-6838
Lead Agency: Anne Arundel Workforce Development Corp.
(Satellite)

DSS Family Resource Center
80 West Street, Suite A
Annapolis, MD 21401
PH: 410-269-4429
FAX: 410-263-7452
Lead Agency: Anne Arundel County Dept. of Social Services
(Full-service)

Fort Meade Outreach Center
Building 4432
Fort Meade, MD 20755
PH: 410-674-5240
FAX: 410-672-3543
(Must have military ID to enter base)
Lead Agency: DLLR Division of Workforce Development
(Satellite)

Freetown Village
7831 Huff Court
Pasadena, MD 21122
PH: 410-437-3052
FAX: 410-437-3052
Lead Agency: AAWDC
Operator: Anne Arundel Workforce Development Corporation
(Satellite)

Ordnance Road Correctional Facility
Re-Entry One-Stop Career Center
600 E. Ordnance Road
Glen Burnie, MD 21061
PH: 410-222-6350 ext. 3151
Lead Agency: Anne Arundel Workforce Development Corp.

- (b) Core, intensive and training services will be delivered in each comprehensive and full-service One-Stop Career Center. Staffs of AAWDC and the DLLR Division of Workforce Development are cross-trained to provide seamless services to job seekers. These consolidated efforts ensure that One-Stop customers can conveniently access labor exchange and job training information. Other partners holding regular hours in the comprehensive One-Stop Career Center include staff from the Division of Rehabilitation Services (DORS), Job Corps, and the Housing Commission of Anne Arundel County.

When a customer enters the One-Stop Center, he/she signs in at the reception desk. The receptionist asks if the customer is a veteran. If the customer is a veteran he/she is informed that there are specialized services to assist veterans. The customer then enrolls in the Maryland Workforce Exchange (MWE) online in the Resource Room, if not already registered. During this visit, the customer will meet with a Career Developer to receive an orientation to One-Stop services, determine job goal and possible intensive service and training needs. If additional services may be appropriate, the customer will receive further needs assessment, workshops, and other staff-assisted services including training. Eligible customers will be enrolled in WIA before receiving intensive services, including formal assessments.

Customers who do not have access to the seven physical satellite and comprehensive One-Stop Career Centers can access One-Stop Services electronically through the MWE. Business-size cards with the MWE web address are available at each of the One-Stop Career Centers and links are provided on AAWDC's webpage.

- (c) By co-locating with other One-Stop partners, AAWDC is able to provide services throughout Anne Arundel County. The Disability Navigator assists AAWDC and partner agencies to identify strategies and technologies to better serve job seekers with disabilities. The Glen Burnie One-Stop Career Center is co-located with the MSDE Division of Rehabilitation Services. DVOP and LVER specialists are stationed in Glen Burnie, Fort Meade and Annapolis. Literature regarding One-Stop services is widely distributed throughout the County's public facilities. TDY telephone access or Maryland Relay Service is provided at the One-Stops. The One-Stop Operator will ensure that partner agencies and clients have access to information on appropriate specialty transportation options offered by local public agencies.

Anne Arundel's One-Stop delivery system is the primary point for delivery of WIA funded services to Adults and Dislocated Workers. Services available through partner agencies will be an important component of Anne Arundel's comprehensive One-Stop service delivery plan. These services, and necessary access and referral information, are outlined in the appropriate MOUs. Services accessible through the One-Stop system will include:

- Core Services - Available at the comprehensive and satellite One-Stop Centers. Core services include registration, eligibility determination, intake and orientation, outreach, basic needs assessment, career counseling, job search and placement assistance, labor market information, and vendor performance information.

- Partner and Supportive Services – Information relative to available partner and supportive services and eligibility for these services will be maintained at all sites.
- Intensive Services – For individuals who have received one or more core services and have not secured employment, intensive services will be available on location at the comprehensive and satellite sites and through contracted vendors.
- Discretionary Services – Customized services for individuals and employers may be made available at the One-Stop Centers and/or under contract through partner agencies.
- Training Services – As outlined in Section IIIB.6(4)(a), access to WIA funded skills training services will be available at AAWDC’s comprehensive and full-service One-Stop Centers for those eligible Adults and Dislocated Workers who have received one or more intensive services, have a documented need for training, have case manager approval for suitability, and meet such other state and local eligibility and suitability requirements as might apply.

The One-Stop Centers will also provide clients, partners, employers, and vendors with access to the State list of eligible training providers.

Services and activities funded or authorized under the mandated partners and which are provided through Anne Arundel’s One-Stop delivery system, will be integrated and made available to clients by means of one or more of the following:

- Co-location
- Technological linkage
- Intra-agency referrals
- Shared funding
- Joint case management

Mandated partners include programs authorized under:

- Title I of the Workforce Investment Act
- The Wagner-Peyser Act
- Title I of the Rehabilitation Act of 1973
- Section 403(a)(5) of the Social Security Act
- Title V of the Older American’s Act of 1965
- The Carl D. Perkins Vocational and Applied Technology Education Act
- Chapter 2 of Title II of the Trade Act of 1974
- Chapter 41 of Title 38 United States Code
- The Community Services Block Grant Act
- Employment and Training Activities under the Department of Housing and Urban Development

- State Unemployment Compensation Laws
- Title II of the Workforce Investment Act

Details of integration activities specific to the partner agencies will be detailed in the relevant memoranda of understanding.

- (d) To the extent possible, AAWDC partners with faith-based and community organizations to provide employment and training services to hard-to-serve populations. Other non-financial, cooperative initiatives include providing job seeker workshops at faith-based and community organizations facilities and working with these organizations on recruitment efforts for youth and senior worker programs.
- (e) Memoranda of Understanding will be renewed and signed with One-Stop partners by June 30, 2009.

6. Services

(a) Adults and Dislocated Workers

- (1) One-Stop Services – The One-Stop system is intended to provide seamless workforce development services to a universal population. The widest possible array of services that best meets the needs of employers and job seekers will be made available. Enhancing the ability of customers to obtain employment suitable to meet their family and quality-of-life needs is a primary goal.

The following service levels will be available to meet the demonstrated need of each job-seeking customer (Adults and Dislocated Workers). The first level of service includes *Core Services*, which are designed to ensure that the most job-ready individuals will receive the level of assistance that will return them to work efficiently and effectively. All One-Stop partners will offer the core services that are applicable to the partner's program through the One-Stop system. Additional core services needs may be met by other One-Stop partners, if necessary, on a referral basis. Thus, the combination of core services from the One-Stop partners will result in a wider array of core services being available and delivered to customers. Core services include:

- Outreach intake (which may include worker profiling and reemployment services) and orientation to the system.
- Initial assessment of skill levels, aptitudes, abilities, and training and supportive service needs.
- Determination of eligibility for services for all partner employment and training programs.
- Job search assistance (i.e., workshops), career information, and counseling.

- Job matching and referral.
- Local, regional, and statewide labor market information.
- Information on financial aid, including unemployment compensation.
- Information on:
 - Certified education and training providers to include course offerings, costs, schedules, prerequisites, etc.
 - Performance of service providers in meeting mandated goals.
 - One-Stop activities, such as job fairs and supportive services.
 - Orientation to personal computers for access to self-directed services, such as Internet access and resume software.
 - Coordination of information and services with school-to-career activities.
 - Follow-up activities, including reassessment services, where needed

The second level of service --- *Intensive Services* --- may be provided to Adults and Dislocated Workers, who are unemployed and unable to obtain employment through core services, if the One-Stop Operator determines that the individual is in need of more intensive services to obtain employment. Adults and Dislocated Workers who are underemployed, but who are determined by the One-Stop Operator to be in need of intensive services to obtain or retain employment that allows for self-sufficiency, are also eligible to receive intensive services. To receive intensive services, an individual must have received core services. The decision to provide additional services will be made on a case-by-case basis by each One-Stop partner depending on the needs of the customer. Intensive services include:

- Customized assessment (beyond initial) of knowledge, skills, abilities and interests by use of various non-self-service assessment tools.
- Development of an individual employment plan.
- Group counseling.
- Individual career planning.
- Case management.

- Short-term pre-vocational skills enhancement and stand-alone services, such as adult basic education, English as a Second Language, GED, basic computer fundamentals, interviewing skills, and related soft skills, which increase the clients' relative competitiveness and marketability.

The third level of service ---*Training Services* --- may be made available through the One-Stop system to Adults and Dislocated Workers who have met the eligibility requirements for intensive services and who have received intensive services through the One-Stop system and are still unable to obtain or retain employment. Decisions to provide training services will be made on a case-by-case basis depending on: (1) customer needs and abilities; (2) the availability of both funds and reasonable and appropriate training; and (3) the relevance of the customer's employment goal to labor market demand.

Training services for Adults and Dislocated Workers include:

- Occupation-specific skills training, including training for non-traditional employment, provided through Individual Training Accounts (ITAs).
- On-the-job training.
- Programs that combine workplace training with related instructions, which include cooperative education programs.
- Private-sector training programs.
- Skill upgrading and retraining.
- Entrepreneurial training.
- Job-readiness training.
- Adult education and literacy activities, where they are integrated with other training services.
- Customized training (with the employer paying not less than 50% of the training cost) conducted with the commitment to employ the individuals upon successful completion of the training.
- Registered apprenticeships and training programs.

Training services may be made available to individuals meeting the following criteria:

- Individuals who have met the eligibility requirements for intensive services but are unable to obtain or retain employment through intensive services alone.
- Individuals who, after interview, evaluation, assessment, and case management, have been determined by the One-Stop Operator to be in need of training services and to have the skills and qualifications to successfully participate in the selected program of training.
- Individuals who select programs of training services that are directly linked to the employment opportunities in the local area involved, or in another area in which the adults or dislocated workers receiving training services are willing to relocate.
- Individuals who are unable to obtain other grant assistance for training or have been unable to secure the full amount of grant funds needed.
- Individuals who are determined to be eligible in accordance with the priority system in the local area.

WIA's three-tiered service approach offers universal eligibility for core services. Some job seekers will need more assistance beyond the core services. As defined in the local MOUs, the One-Stop Operator will determine which additional services to offer, based on a variety of factors, such as skills assessment, customer's literacy level, transportation availability, and childcare or adult-care needs.

In addition, barriers to employment in connection with disabilities or substance abuse problems will also be considered at the time of this initial assessment. Finally, the customer's job search history, along with feedback from the employer or job seeker, may be an indicator that more intensive service is needed.

One-Stop system staff will be guided by the requirement that all job seekers must receive at least one core service before being eligible for intensive services. Job seekers must receive at least one intensive service before they are eligible for training services. Movement between levels of service will be documented in their case management files. Career Developers continually reassess the job seekers' progress in a specific service or their need to move into training. One-Stop staff will consider such factors as funding, availability of appropriate training, and projected demand for jobs in a particular area. Staff will also consider assessment information on job seekers' ability to handle a requested curriculum.

WIA's underlying principle for the provision of training services is guided customer choice. Individuals who are eligible for and have been recommended for training services under Title I will have the opportunity to select any of the eligible providers, from any of the local areas in the State, that are included on the State eligible-provider list. This provider list is aggregated from those lists submitted by the local areas and might contain out-of-state providers.

While customer choice is the major consideration, the local WIA must exercise good judgment and fiscal sense and require the customer to choose the most cost-effective option as long as the course content, etc. is basically the same. Factors relating to the convenience for the customer, i.e., commute range, course hours, shorter length of training program, etc. will also be taken into account in the approval process.

Training will be geared toward the business needs of the local workforce investment area, region, or State. It is understood that training should be prioritized for occupations in demand in the local labor market, or in a labor market to which the customer is willing to move. Priority will also be given for critical-need occupations and occupations with higher-level skill requirements. An occupation in demand also includes a job for which there is ordinarily limited demand, but the individual has a bona fide job offer, contingent upon completion of training.

Job seekers eligible for training services will be able to select programs of training that are directly linked to occupations that are in demand in the local area, or in another area to which an adult or dislocated worker is willing to relocate. The WIB will approve training services for occupations determined to be in sectors of the economy that have a high potential for sustained demand or growth in the local area. Training services will be provided in a manner that maximizes consumer choice in the selection of an eligible provider of training services from the State list of eligible providers of training services.

- (2) Supportive Services - The WIB recognizes that in certain circumstances the provision of services which directly impact employability must be supplemented by client supportive services. In all cases, AAWDC will first broker these services for the client from appropriate partner agencies or other provider sources. However, when supplemental services are not available, or are not the most effective or responsive to the client's need, WIA Title I funds may be utilized to provide short-term supportive services. Such services may include, but are not limited to, transportation, tools, uniforms, childcare, occupational licensing application fees, testing, occupational certification fees and dependent care. Eligibility for Supportive Services will follow WIA eligibility policy.

The Supportive Services policy is as follows.

Supportive Services Payment Formula

The primary supportive service payment system to be utilized will be a flat-rate system designed to defray participant transportation, childcare, and dependent care expenses. A three-tier system has been developed, and is as follows:

Tier 1: Participants who must travel 50 miles or less round-trip to training may be provided a payment of \$5.00 per day for each day of actual classroom training attendance to assist with the costs associated with round-trip transportation to the training site.

Tier 2: Participants who must travel over 50 miles round trip may be provided \$7.00 per day for each day of classroom attendance.

Tier 3: Participants who are in need of childcare assistance and are unable to obtain assistance from the Department of Social Services (DSS), or whose assistance from the DSS is less than the provider's published rate, may receive a payment that will, in combination with available payments through DSS, provide payment for actual childcare costs. The maximum payment per participant for the dependent care payments shall never exceed \$20.00 per day; \$100.00 per week; and/or \$1,000.00 per client.

Other Supportive Services

Additional supportive services may be provided, dependent upon the resources available, to clients whose employment plan indicates they would be unable to participate in a training program without such assistance. The supportive services made available may include training or placement, physical examinations, uniforms, tools, driver education/license application fees, childcare, occupational licensing application fees, testing, occupational certification fees and dependent care, etc., necessary to meet the requirements to enter training, attend training, or begin employment. Recognizing that such supportive services needs arise occasionally, AAWDC may provide other services that are allowable under WIA if adequate funds are available. These services may include, but are not limited to, the provision of appropriate attire for job interviews or other job-search-related activities, shelter, transportation, sustenance, other personal items, and expenses directly related to obtaining and maintaining employment. The level of maximum funding per client remains at \$1,000. Financial assistance will be used to pay for necessary services only, and will be limited to discrete payments approved by the President and CEO. The determination of such need, and the amount, will be based on the results of an objective assessment and documented in the employment plan. The delivery of these services will be integral to each individual service plan. Whenever possible and expedient, supportive services will be provided through referral to partner organizations or other local human services agencies.

In all cases of client need, One-Stop staff and partners will assist participants to obtain part-time work during training and/or, if eligible, to apply for food stamps, public assistance, transportation subsidies, shelter, or such other services as may be needed to successfully complete training and to become employed.

- (3) Needs-Related Payments - Anne Arundel's One-Stop Centers will not provide needs-related payments. If resources become available for this activity, a correlating policy will be developed.
- (4) Individual Training Accounts (ITAs) - Anne Arundel's One-Stop System operates on the belief that strategic partnerships with higher education and economic development are essential for providing demand-driven employment and training services. To that end, the Career Developer

evaluates the client's appropriateness, in terms of skills and qualifications, to succeed in an MHEC-approved occupational skills program. Consideration for occupational training will require the client's completion of appropriate aptitude, vocational and other assessments; career-planning activities; and an expressed interest in a high-demand occupation. Prior to being approved for an ITA, the client must research job opportunities, State approved training vendors, wage potential, and supplementary funding sources such as Pell Grants, scholarships, etc. AAWDC's ITA process will generally follow its current payment system, which includes payment directly to the vendor.

The following summarizes Anne Arundel County's One-Stop policy for ITAs:

- (a) Individuals will initially receive core services and intensive services through Anne Arundel's One-Stop system. Individuals who are unable to find employment after receiving both core and intensive services may, if deemed appropriate after the development of an Individual Employment Plan (IEP) in conjunction with a Career Developer, be issued an ITA that provides training linked to high-demand job opportunities in the local area. As part of this individual assessment process, labor market information will be made available through the comprehensive One-Stop Center. This information will include job openings; skills needed for demand occupations; wage profiles; and local, regional and national employment trends.
- (b) Individuals will have choices in deciding the training program that best fits their needs and the organizations that will provide the services. Staff at the One-Stop Centers will ensure that ITA-qualified individuals have access to the State List of Occupational Training Providers, as well as information about how well these training providers performed. The One-Stop system in Anne Arundel County will facilitate customer choice with the assistance and guidance of professional career counseling staff. Individuals will be encouraged to pursue training in one of the State's identified high-demand occupations.
- (c) The ITA applies to the costs of tuition, required books, and necessary fees for an approved training program offered by an approved occupational training provider. The Anne Arundel County WIB has approved a per-individual training limit of \$5,000, over a period of three years, for an approved occupation-specific training program in a high-demand labor market area.
- (d) Individuals will be required to first apply for Pell Grants and other sources of funding prior to determining the value of an ITA. In some cases, supplemental resources, such as Pell Grants, will be combined with WIA funds to fully cover the tuition, required books, and fees of an approved training program.

- (e) After a WIA client is authorized by the staff of the One-Stop Operator to attend a training program with an eligible training provider, the One-Stop Operator will provide the individual with a completed pre-training agreement form for the selected training program. The pre-training agreement form will include the total amount of costs for tuition, required books, and fees that will be paid by AAWDC. Based on the terms of the ensuing vendor contract, the training provider can submit an invoice to AAWDC, which sets forth all approved tuition and fees for the WIA client. Payment for properly charged tuition, required books, and fees shall be made by AAWDC in a timely manner.
- (f) The tracking of ITA obligations and ITA payments will be managed at the AAWDC Administrative Office. This obligation and expenditure information will be disseminated to staff at the local One-Stop Center on a routine basis to ensure that up-to-date information is available to the customer-service staff and clients.
- (g) On-the-Job Training (OJT) will be offered when OJT is determined to be the most cost-effective and appropriate method to obtain specialized occupational training. OJT is training provided by an employer in the public, private non-profit or private sector. Such training will be detailed in a contract between the employer and AAWDC, which specifies the occupation(s) in which training will be provided, an outline of the training and skills to be acquired, the basis of cost payments for training and other conditions.

The cost of training each participant under the contract will be reimbursed monthly to the employer. Reimbursement will be based on 50% of the participant's initial starting wage, which must be at least \$9.00 per hour. The reimbursement to the employer is to compensate for the employer's extraordinary costs associated with training participants and for the lower productivity of such participants. Monthly reimbursements will be made upon the receipt of proper invoices and participant time records (on forms supplied by AAWDC).

AAWDC will not enter into an OJT contract with any employer who has previously exhibited a pattern of failing to provide OJT participants with continued, long-term employment with wages, benefits, and working conditions that are equal to those provided to regular employees who have worked a similar length of time and are performing the same type of work.

OJT contracts will be limited to the period of training time required for a participant to become reasonably proficient in the occupation for which training is being provided. The length of training will be negotiated by AAWDC and the employer, based on the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience

and the individual's employment plan. In no case will training exceed 1,040 hours.

- i. Customized Training: If an employer is determined to require a skill that is not available among the current labor pool and for which there is no local training program available, AAWDC can contract with local training providers to develop a curriculum and train workers to acquire that skill. The employer will be expected to pay 50% of training costs, and to hire successful completers to fill vacant positions.

(5) Priority of Service

AAWDC adheres to WIA 663.600 requirements that low-income and public assistance participants receive priority for WIA Title I Adult Intensive and Training Services. However, most intensive services may be considered as fixed costs of the One-Stop Operator. No denial of service to non-targeted customers is anticipated. Should the charges allocated to intensive and/or training services exceed 75% of budget by the end of the second quarter of the fiscal year, AAWDC management will review end-of-year projections and obligations and determine whether to institute priority eligibility requirements for services for low income and public assistance recipients. Priority status will also be accorded to jobless members of the following target groups as a matter of course:

- Veterans
- Basic Skill-deficient
- Non-high School Graduate
- Disabled Individual
- Older Worker
- ESOL
- Two-year History of Low-paid Employment
- Offender or Ex-offender
- Shelter Resident or Homeless

In all cases, AAWDC reserves the right to institute its "most in need and most likely to benefit" from WIA Adult policy if, based on its experience with local economic or other variables, it determines that there is a reasonable probability that there will be a deficiency of resources (WIFI 4-99). In determining the need for training, WIA funds will always be considered supplemental and applicants will first be required to seek training funds from other sources, including Pell.

(6) Self-sufficiency and Inability to Retain Employment

For purposes of accessing intensive or training services, an employed worker for whom these services may be seen as necessary to retain employment or to achieve self-sufficiency will qualify for these One-Stop services if the following apply:

- He/she earns an annual wage which meets the most recent guidelines defining Maryland's lower living standard income level(s), as adjusted according to family size; or
- He/she has documented net earnings at or below a livable wage (which is defined as 200% of the minimum wage).

For employed Dislocated Workers, self-sufficiency will be defined as: (1) employment in a job that pays 75% of the pre-layoff wage; or (2) current employment at or below 200% of the minimum wage.

Inability to retain employment will be defined as: (1) qualifying for unemployment more than once in the 12-month period prior to application; or (2) the loss of two or more jobs, without cause, in the 12 months preceding application. This policy, as with all locally determined policies, must be considered subject to modification, based on changes in local labor market or other relevant conditions. AAWDC reserves the right to waive "self-sufficiency" and "inability-to-retain" criteria in special cases.

- (7) The primary staff contact person who will work with the State Dislocated Worker Unit to plan and provide Rapid Response services in Anne Arundel County is Sandra Chappell, Career Developer, who is stationed at the Sales and Services Center at Arundel Mills. Donna Camp, AAWDC Director of One-Stop Services, is the alternate contact.

(b) Youth

- (1) Anne Arundel County has a broad array of youth service programs provided through numerous public agencies, non-profit organizations, and the educational system.

In brief, Anne Arundel's strategy for providing comprehensive services to eligible youth will include, but not be limited to:

- An objective assessment that includes a review of academic and occupational skill levels, as well as service needs. After completing the enrollment eligibility paperwork, the youth program vendor must give each youth one of the WIA-approved assessments. The assessments used in Anne Arundel County include the STAR, TABE, CASAS, GED Practice Test, State Assessments and/or Hollands.
- Development of an Individual Service Strategy (ISS) must be completed for each youth enrolled in the WIA-funded program and included in the case management file.
- Preparation for post-secondary educational opportunities; linkages between academic and occupational learning; preparation for employment and connections to intermediary organizations with links to the job market and employers. The youth service provider ensures that every youth enrolled in the program is aware of the post-secondary educational opportunities available through the community

college, four-year institutions, structured apprenticeships and independent vocational schools. In addition, youth receive job placement assistance through specialized counseling and recruitment events.

- Availability of ten program elements outlined in WIA. WIA-funded youth work experience activities include instruction on workplace skills, career development information, and materials to support life-long learning. Youth programs that provide occupational skills training are given priority consideration by the Youth Council in its review of youth services. Areas of high labor demand include construction and trade skills, cable installation, office technology, health occupations, and retail trade skills. Leadership activities will be integrated into in-service learning; organizational, team building, and life skills development; instruction in effective work behaviors; and employability workshops.

Comprehensive guidance and vocational counseling will be provided to youth who are active participants in WIA-funded activities. Referrals for additional counseling, as indicated, will be made as appropriate to the youth's needs.

AAWDC and Woodland Job Corps Center have entered into a memorandum of understanding to co-enroll at-risk youth in both programs. In addition, the youth program vendors work collaboratively with the YWCA, DSS, and the Community Action Agency to identify low-income and at-risk youth who can benefit from WIA-funded services.

- (5) Through a competitive bidding process, AAWDC selects its youth vendors and programs based on each vendor's ability to provide high quality services to at-risk youth. Toward this goal, AAWDC has increased partnerships with Anne Arundel County Public Schools, Anne Arundel Community College, employers, and community-based organizations.

Youth served in alternative education programs receive a high quality education. AAWDC uses a portion of its WIA youth funds for a dropout prevention program. In addition to being low-income, students enrolled in this program are in danger of repeating a grade level or have repeated at least one grade level. Participants engage in mentoring, job shadowing, career exploration, tutoring and peer mediation training activities.

Investments of WIA youth resources are demand-driven, helping youth acquire the skills needed to be successful in a 21st century economy. The out-of-school youth program features GED instruction, and skills training in high-demand occupations (i.e., retail and hospitality careers). Upon completion of the program, participants receive a certificate in retail services endorsed by the National Retail Federation. While not primarily high-wage positions, these occupations are important in that they support higher-wage, higher-skill occupations and provide opportunities for advancement and skill upgrading. Labor market information demonstrates a growing need for skilled workers in the retail and hospitality/tourism industries.

Investments are prioritized to serve youth most in need. AAWDC's youth programs serve low-income out-of-school youth. Youth with disabilities, in foster care or aging out of foster care, adjudicated, and other at-risk are given priority of service in the recruitment process. To better identify youth who could benefit from WIA-funded services the youth vendors work closely with the YWCA, Job Corps, and other service organizations working with at-risk youth in Anne Arundel County.

Youth programs are performance based and outcome focused. All youth vendors must meet enrollment requirements and the performance standards for youth as specified under the Workforce Investment Act. Failure to meet performance is grounds for termination of the vendor's contract.

- (3) The sixth criterion to be used as an eligibility determinant in Anne Arundel's WIA youth program is: *an individual (including a youth with a disability) who is a non-high school graduate and/or a youth who needs additional assistance in obtaining or maintaining employment.* Evidence that a youth needs assistance will be based on a record of chronic, short-term employment or no employment; or no sustained employment at a wage exceeding \$8.00 per hour.
- (4) One in four youth exit Anne Arundel's public school system without having achieved a diploma. When added to the expanding cohort of youth who, despite having earned a diploma, lack the basic work, social, and literacy skills required by today's employer community, this target group represents a waste of critical workforce potential.
- (5) To ensure that no more than five percent of youth participants in the local area do not meet the income criterion for eligible youth in accordance with Section 664.220 of the WIA regulations, the Management Information Systems Coordinator and the President and CEO must pre-approve each application prior to enrollment. The MIS Coordinator keeps a spreadsheet to track enrollments.

7. Customer Flow System

All customers who seek One-Stop services, including those referred by partner agencies, will be welcomed at any Anne Arundel authorized One-Stop site. Eligibility determination and core services will be provided by AAWDC and Wagner-Peyser staff and recorded electronically in the MWE Case Management system. Customers unable to realize their career goal through self-service or other core activities will be considered for intensive services. Registration for intensive services and eligibility for training services will be determined by AAWDC's professional Career Developer staff. In general, clients can be expected to receive the following basic intensive services: assessment, career and labor market guidance, goal setting, individual or group counseling, and job search/job placement assistance. When indicated, the Career Developer may recommend additional intensive services as part of the client's IEP, including, but not limited to, pre-vocational skills training, basic literacy, GED referral, computer fundamentals, and employability training.

WIA-defined training services will be offered subject to the priority of service, self-sufficiency, and other eligibility criteria noted in Sections III.B.6. (a)(5) - (6) above. AAWDC and DLLR staff will be responsible for case management, MIS, and performance reporting of clients registered for intensive or training services. In all cases, AAWDC will select a plan of follow-up activities that will involve the least intrusive and most client-friendly activities. Follow-up strategies may include phone calls, emails, standard mail, and face-to-face meetings, etc., as well as an examination of wage records. Case managers are required at a minimum to provide follow-up at 30, 60, and 90-day intervals.

8. Performance Management

AAWDC will fully participate in all trainings provided by the Maryland Department of Labor, Licensing and Regulations and U.S. Department of Labor relating to meeting performance standards. Staff will attend training developed by the Maryland Institute for Workforce Excellence, National Association of Workforce Development Professionals and other employment and trainings vendors, as appropriate. AAWDC management will utilize data reports generated by the MWE and in-house management tools to continually monitor local area performance. All service providers will receive periodic trainings on performance standards and strategies. The WIB and Youth Council will be briefed on the local area's performance on a quarterly basis. The County Executive or his designee will receive monthly briefings.

9. Sunshine Provision

AAWDC published the availability of the draft plan for public review in the *Capital-Gazette* Newspaper on May 17, 2009. AAWDC staff was available to receive comments at a public hearing at the Arundel Mills One-Stop Career Center on June 8, 2009. The plan was also made available on the agency's website during the public comment period.

IV. ADMINISTRATIVE PROVISIONS

A. PARTICIPANT ELIGIBILITY PROCESS

The following participant eligibility policies for youth, adults, and dislocated workers, based on guidance provided in WIFI 2-99, have been approved by the WIB. Documentation appropriate to demonstrate the following eligibility indicators will be maintained in client files.

Youth

1. Deficient in Basic Skills

- Performs below 8.9 in literacy or numeracy skills, as demonstrated on a standard method of measurement; or
- Is unable to compute and solve problems, read, write, or speak English at a level necessary to function on the job, in an individual's family, or in society, as indicated in IEDP, based on professional judgment and/or other indicators.

2. Requires Additional Assistance (see Section III.B.6(b)(5))

- Has not completed high school or obtained a GED;

- Has had only low-wage, short-term employment; or
- Attests to inability to secure a wage at a self-sufficiency level.

3. Other Eligible Youth Who Face Serious Barriers to Employment

- Serious barriers include, but are not limited to, homelessness; substance abuse; involvement with Department of Juvenile Services or related juvenile system; history of truancy, abuse, school suspensions or disciplinary actions, family estrangement, anti-social behavior, ADD, or hyperactivity.
- Concurrent enrollment will meet requirements outlined in WIFI 2-99.

Adults/Dislocated Workers

1. Eligibility/Priority of Services

- See WIFI 4-99 and Section III.B.6 (a) of this plan.

2. Provisions of Intensive and Training Services

- See WIFI 6-99 and Section III.B.6 (a) of this plan.

B. OVERSIGHT AND MONITORING

1. Where applicable, all sub-recipient and OJT contracts and in-house services are monitored no less often than annually, or at least once during the contract period. More frequent monitoring is scheduled on an as-needed basis. Monitoring is defined as encompassing both desk audits and on-site visits.
2. Fiscal staff and other staff procedures include, but are not limited to:
 - Reviews of all incoming invoices for completeness, accuracy, appropriateness, and compatibility with cost allocation procedures.
 - Notification to payee in the event a corrective action that would include a basis for an adjustment is either anticipated or required.
 - Ensuring that required corrective action is accomplished and maintaining appropriate documentation regarding the accomplishment of recommended corrective action.
 - Review of timesheets for completeness, accuracy, and compliance.
 - Review and verification of MIS records to ensure contract compliance and/or evaluate performance against goals.
 - Reconciliation of participant information submitted by sub-recipients with MIS participant records.

- Conducting scheduled and non-scheduled site visits to ensure compliance with the planned scope of work.
 - Issuing “required actions” notifications to sub-grantees in the event of unsatisfactory findings.
 - Conducting follow-up visit(s) to verify compliance with corrective action recommendations.
 - Reviewing required documentation during on-site visits, (e.g., timesheets, payroll records, etc.) which impact the fiscal reporting and accountability of the sub-recipient, as well as sub-recipient independent audit reports, whenever possible, appropriate, and/or required.
 - Conducting regular desk-audit procedures to ensure contract compliance by OJT sub-recipients.
 - Conducting at least one site visit to OJT sub-recipients during the term of the contract with the purpose of ensuring fidelity with the terms of the contract.
3. On-site monitoring will ensure compliance with provisions of WIA Section 667, Subpart B, of the regulations, and other applicable laws and regulations.
4. Monitoring reports will be dated, signed, and handled as follows:
- Copies of all monitoring reports will be filed sequentially by fiscal year.
 - Findings requiring corrective action will be reviewed and signed by the President and CEO prior to submission to the sub-recipient. Documentation will request a response by a specified date.
 - Results of required corrective actions shall be verified and recorded.
 - Findings of a minor nature relative to performance may be communicated to the service provider at regular program oversight meetings or at the time of the monitoring visit.

Monitoring reports will generally include the following information:

- Date of the monitoring visit or communication.
- Name of the sub-recipient or program operator.
- Identification of those areas which were reviewed and the results of such review.
- Description of any perceived problem area or instance(s) of noncompliance.
- Written notice of corrective action, where applicable.

- Signatures of the President and CEO and appropriate senior staff members.

NOTE: In the case of a serious contract violation, or in the event corrective actions are insufficient to address the identified problem(s), AAWDC's response may include, but is not limited to, cancellation of the contract and the initiation of action to reclaim any funds in question.

5. Technical assistance may be offered: (a) at the request of the vendor or contractor during routine visits; (b) following a complaint or grievance; (c) as a result of a performance review; or (d) during a scheduled or unscheduled monitoring visit to ensure that any corrective actions will be implemented prior to the official monitoring visit.
6. Performance will be measured based on common data elements captured by all partner agencies and recorded in the State MIS system.

Employment and training activities under Title I of WIA, as reflected in State performance reports, will be reviewed by the WIB regularly, but no less than annually.

C. GRIEVANCE PROCEDURES/COMPLAINT PROCESSING PROCEDURES

These complaint procedures were developed in accordance with Section 181(c) of the Workforce Investment Act (WIA).

1. Availability of Anne Arundel County WIB Complaint Procedures

Participants and other interested parties affected by the Local Workforce Investment system, including One-Stop partners and service providers, may file complaints using these procedures:

Notice of availability of these procedures will be given to:

- a. Participants upon enrollment into the MIS.
- b. Sub-recipients and subcontractors as part of grant agreements or contracts.
- c. Other interested parties, upon their request to AAWDC.

Documentation of the receipt of the complaint procedure information will be maintained by AAWDC. This documentation will include a copy of Attachment 11c and the disposition of the complaint. Records will be maintained in a confidential location for a period of not less than three years from the date of complaint resolution.

2. Types of Complaints

Complaints alleging violations of the WIA or its implementing regulation will be classified as one of two types, based on content. Each type of complaint will be handled in a different fashion, pursuant to Section 667.600 of the WIA regulations. The two types of complaints are:

- a. Type I Complaints – These are complaints which allege discrimination on the basis of any of the following:

- | | |
|-------------------|---------------------------------|
| - Race | - Political Affiliation |
| - Sex | - Citizenship |
| - Color | - Disability |
| - National Origin | - Participation in WIA programs |
| - Religion | - Age |

- b. Type II Complaints – These are complaints that do not allege any form of illegal discrimination. They include grievances from individuals alleging labor standards violations.

3. Procedures

- a. Type I Complaint Procedure (alleging discrimination on the basis of race, sex, color, national origin, religious belief, age, political affiliation, citizenship, disability, or participation in a Workforce Investment Act Program)

(1) Filing the Complaint

- (a) AAWDC encourages all persons with complaints to first discuss their concerns with the person(s) who has generated the concern(s). If, after attempting to resolve the problem informally, the individual still wishes to formally pursue resolution of his/her complaint, he/she may choose one of the following options:
- Pursue resolution through AAWDC by contacting the President and CEO of AAWDC directly and attempting to resolve the matter.
 - Pursue resolution through the Directorate of Civil Rights.
 - Concurrently pursue the complaint through the Directorate of Civil Rights and the Anne Arundel County WIB and/or its sub-recipients.
- (b) All complaints alleging discrimination on any of the bases listed above must be filed within 180 days of the event that triggered the complaint.
- (c) Complaints filed with AAWDC must be documented on the WIA Complaint Record form, which is Attachment 11b.

(2) Resolving the Complaint

- (a) Directorate of Civil Rights (DCR) Investigation – A complainant or his/her representative may file a Type I complaint with the DCR at any time. There is no waiting time or lower-level hearing that must precede this filing. Details on the steps that the complainant must follow in filing a complaint with the DCR will be provided to the complainant when requested.

- (b) Representatives of sub-recipients or other interested persons have the option of either filing their complaint with the sub-recipient (e.g., for interested persons) or with AAWDC. If a complainant elects to pursue resolution through a sub-recipient he/she must file the complaint in accordance with the procedures established by the sub-recipient.

Procedural guidelines for filing a complaint are as follows:

- Sub-Recipients - AAWDC sub-recipients must immediately notify AAWDC of all complaints received in writing that allege discrimination on the basis of race, sex, color, national origin, religious belief, age, political affiliation, citizenship, gender, disability, or participation in a WIA program. AAWDC will notify the Maryland Department of Labor, Licensing, and Regulation (DLLR) and the Directorate of Civil Rights of the complaint's existence and content. The form to be used in notifying these agencies is included as Attachment 11f.

Sub-recipients are permitted 30 days to attempt a resolution of the complaint using the procedures developed by the sub-recipient. If, after 30 days from the date of filing the complaint, the complainant has not achieved a satisfactory resolution of his/her complaint, he/she may file the complaint with AAWDC. The form included as Attachment 11b should be used to document the complaint.

- AAWDC Procedures – Upon written receipt of a Type I complaint, AAWDC will send a written notice to the complainant acknowledging receipt of the complaint and providing notice that the complainant has the right to be represented. The written notice will list the issues raised, with a statement as to whether the recipient will accept or reject each issue for investigation. A period of fact-finding investigation will be provided and AAWDC will convene a hearing, to which the complainant and any other person(s) involved in the complaint are invited. Both the complainant and respondent have the right to be represented by an attorney or representative of their choice. AAWDC will hold this hearing within 15 days of receipt of the complaint and will identify a person who is not involved in the complaint to preside as the hearing officer. The written notice of complaint procedures to be used is included as Attachment 11e.

If a recipient determines that it does not have jurisdiction over a complaint, the complainant will be notified in writing through a "Notice of Lack of Jurisdiction." This notice will state the reasons for determination and will advise the complainant of their right to file a complaint with the DCR.

AAWDC will process discrimination complaints within 90 days with one of these final actions: issuance of a Notice of Final Action, issuance of a written Notice of Lack of Jurisdiction, or referral of complaint to another Federal grant making agency.

- General - The hearing officer will issue a written description of his/her judgment regarding the complaint, including his/her recommendation for resolving the complaint, within 30 days of the date that the complaint was first filed (either at the sub-recipient level or with AAWDC).

- (c) Concurrent Procedure – Complainants may choose to file their discrimination complaint with both AAWDC/Sub-recipient and the Directorate of Civil Rights at the same time. In that case, the procedures described above under (a) and (b) should be followed concurrently.

b. Type II Complaint Procedure (not alleging any form of illegal discrimination)

(1) Filing the Complaint

AAWDC strongly encourages all persons with complaints to first discuss their concerns with the person(s) who has generated the concern(s). However, if after attempting to resolve the problem informally, the individual still wishes to formally pursue resolution of his/her complaint, he/she must adhere to the following guidelines.

- (a) Complainants who are participants in AAWDC's sub-recipient programs must file their complaint in accordance with the procedures established by the sub-recipient. Representatives of sub-recipients or other interested persons have the option of either filing their complaint with the sub-recipient (e.g., for “interested persons”) or with AAWDC.
- (b) All complaints not alleging discrimination must be filed within one year of the event that triggered the complaint.
- (c) Complaints filed with AAWDC must be documented on the WIA Complaint Record form, which is Attachment 11b to this document.

(2) Resolving the Complaint

- (a) Sub-Recipient Procedural Guidelines – Sub-recipients are not limited by time in their handling of non-discrimination complaints. The existing complaint procedures adopted by the sub-recipient should be followed.

If, after exhaustion of the sub-recipient’s procedure, a complainant is dissatisfied with the proposed solution to his/her complaints,

he/she may file the complaint with AAWDC. The form included as Attachment 11b should be used to document the complaint.

- (b) AAWDC Procedures – Upon receipt of a written complaint not alleging discrimination, AAWDC will convene a hearing to which the complainant and other persons involved in the complaint will be invited. Written notices (invitations to attend) about the hearing will include the date, time, and location of the hearing. AAWDC will hold the hearing within 30 days of the date on which it received the written complaint (on the form included as Attachment 11b) and will identify a person who is not involved in the complaint to preside as the hearing officer.

At the hearing, an opportunity will be provided for all parties (persons) involved in the complaint to present evidence. An audiotape of the complete hearing will be made and maintained for possible review by the Maryland DLLR.

A written decision on the complaint, arising from the hearing, will be issued to all persons present at the hearing within 60 days of the date on which AAWDC received the complaint.

- (c) Additional Procedures – If a complainant does not receive a decision by AAWDC within 60 days from the date he/she filed the complaint with AAWDC, or received a decision satisfactory to him/her, the complainant only has the right to request a review by the Maryland DLLR. A request for this review must be made within 10 days from the date on which the complainant should have received a decision (60 days after filing with AAWDC). Details on how to file a request for Maryland DLLR review will be provided in the written decision rendered by AAWDC on request from AAWDC.

4. Other Complaint Procedures

Complaints arising from action taken by the grantee with investigation or monitoring reports of sub-grantees, contractors, and other sub-recipients will follow the course of Type II Complaints, as stated in the above procedures.

5. Remedies

After review by the WIB, the following remedies may be imposed for a violation of any requirement under WIA Title I, including but not limited to:

- a. Suspension or termination of payments under the Title.
- b. Prohibition of placement of a participant with an employer that has violated any requirement under WIA Title I.
- c. Where applicable, reinstatement of an employee, payment of lost wages and benefits, and reestablishment of other relevant terms, conditions, and privileges of employment.

- d. Where appropriate, other equitable relief.

D. NON-DISCRIMINATION AND EQUAL OPPORTUNITY PROVISIONS

No otherwise qualified individual with a disability shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity conducted by AAWDC and its One-Stop partners.

1. Reasonable Accommodation

AAWDC and its One-Stop partners will provide reasonable accommodation to qualified individuals with disabilities to assure access to aid, benefits, services, training, and employment, unless providing the accommodation would cause undue hardship.

2. Communication – Individuals with Disabilities

AAWDC and its One-Stop partners will take all reasonable and appropriate steps to assure that communications with individuals with disabilities are effective. Appropriate steps may include, but are not limited to, the following.

- Providing auxiliary aids or services
- Providing telecommunications devices or telephone relay services
- Providing sign language interpreters
- Converting materials to Braille or purchasing computer assisted aids
- Collaborating with DORS

3. Notice and Communication – Languages Other Than English

For customers with limited English-speaking abilities, AAWDC will make every effort to ensure that all One-Stop partners and contractors provide appropriate assistance. AAWDC in partnership with DLLR contracts with Language Link or other service providers to provide interpretation services. Whenever practicable, limited English-speaking participants will also be referred to local “English As A Second Language” programs prior to, or concurrent with, receipt of One-Stop services.

4. WIA Compliance

With regard to nondiscrimination and equal opportunity in WIA Title I financially assisted programs; AAWDC will comply with WIA Section 188 and 29 CFR Part 37.

E. PROCUREMENT AND CONTRACTING PROCEDURES

1. AAWDC’s procurement procedures will comply with WIA and WIA Final Rules, as well as standards established by the State.

Property contracts will adhere to Property Management Procedures taken from the Office of Management and Budget, OMB Circular A-110, and Department of Labor regulations 29 CFR Part 97, Uniform Administrative Requirements for Grants and Cooperation Agreements to State and Local Governments.

Service providers will be selected by utilizing the Competitive Bid or Request for Proposal formats. Selection of all service providers will be based on the vendor's ability to demonstrate prior effectiveness in the performance of job training programs and achieve performance standard goals; provide fiscal accountability and cost effectiveness; and serve the targeted population. Proper consideration shall be given to the community-based organizations based on cost, quality of training, characteristics of participants, and meeting performance goals.

Sole-source contracts may be necessary for services not available by multiple vendors, or by vendor ability/knowledge to perform necessary service. Sole source procurements will be justified in accordance with the criteria in Chapter II-10 of the One-Stop Technical Assistance Guide.

Duplication of services or facilities available from Federal, State, or local funds will not occur unless it can be demonstrated that alternative services or facilities are more effective or contribute to the achievement of the Anne Arundel County Workforce Investment Area's goals.

Local education agencies will be given the opportunity to provide services unless it is demonstrated that alternative agencies would have greater potential to enhance the participant's occupational and career growth.

AAWDC will not fund any skills training unless the level of skills provided in the program is in accordance with any guidelines which may have been established by the WIB.

2. AAWDC and the WIB agree to adhere to a code of conduct and procedures to avoid conflict of interest, or the appearance of such conflict, in the exercise of their responsibilities, particularly those relating to the awarding of contracts (Attachment 12). All members of the WIB must sign a Conflict of Interest Policy in order to remain members in good standing. The standards governing the conduct and performance of members of the WIB (as noted in its by-laws), its officers, AAWDC Officers and staff, its Board members, and authorized agents who are engaged in the procurement of goods and services using Federal funds are as follows.

Except as otherwise permitted or provided by Federal, State, or local laws, rules, and regulations, the following provisions shall apply:

- (1) WIB members or AAWDC employees will not be permitted to participate in the selection or award of a contract supported by Federal or State funds if there is an apparent conflict of interest.
- (2) WIB members or AAWDC employees will not be permitted to solicit or accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to any agreement, or to accept gratuities, favors, or anything of a monetary value in excess of \$35.00 from contributors, etc.
- (3) WIB members or AAWDC employees will not be permitted to use any knowledge gained through their position for personal profit or the profit of family or associates.

- (4) Conflict of interest standards cover WIB members or AAWDC employees who are involved in the procurement process in which their relationship to the award recipient could be categorized as:
- (a) The member, officer, employee or authorized agent.
 - (b) Any member of his/her immediate family.
 - (c) His/her business partner.
 - (d) Any organization which he/she belongs to or that employs any of the above, or has a financial interest in the firm being considered for an award.

No member of any council under this Act shall cast a vote on the provision of services by that member (or any organization which that member directly represents), or vote on any matter, which would provide direct financial benefit to that member. Further, 20 CFR 627.420(c) adds that, regarding conflict of interest, each recipient and sub-recipient shall maintain a written code of standards governing the conduct of administrative personnel, in addition to ensuring that no individual in a decision-making capacity shall engage in activities such as selection, award, and administration when a conflict of interest, real or apparent, is evident.

F. FISCAL CONTROLS

1. All financial transactions are executed and records are maintained, in accordance with Generally Accepted Accounting Principles (GAAP). AAWDC's financial management system is capable of tracking obligations, assets, and expenditures, as well as program income, stand-in costs and "profits."
2. The fiscal staff includes the Chief Financial Officer (CFO) and Accounting Assistant with other temporary staff as may be needed.
3. The financial system tracks all purchase orders, invoices and payments as individual transactions and summarized in cost/grant reports and the general ledger. The system readily identifies the type of expenditure, the cost category, and the source of funds used to make payment. The appropriateness of the charges is reviewed by the CFO and President and CEO.
4. (a) The accounting system produces reports that provide information required for reporting and tracking expenditures. Example of these reports are:

Obligation Report	Balance Sheet
Check Register	Income/Expense Report
Check Summary	Trial Balance
Bank Reconciliation	Grant/Program Reports
- (b) The fiscal unit uses the accounting system to prepare all purchase orders. When invoices are received against the purchase order, the system reduces the open balance by the amount of the invoice. An obligation report shows the open balance on a purchase order at any point in time.
- (c) ITA payments follow the accounts payable procedures. All payments are based on contracts and require documentation of progress and attendance. The vendor must apply the Pell Grant or other financial assistance to the client's account prior to billing AAWDC for payment.

(d) The chart of accounts identifies balance sheet, revenue and expense accounts. “Classes” are established for each funding source, grant year, and cost category. The accounting system is also capable of tracking appropriate reportable elements, such as target group and program component expenditures.

(e) Accounts Payable Process

- Receipt of Invoices – Invoices are date-stamped when received by the Executive Assistant and forwarded to the fiscal unit. After receipt, the fiscal unit reviews all invoices to resolve any obvious inaccuracies and enters in the accounting system. The appropriate general ledger expense or asset accounts are debited and Accounts Payable is automatically credited. The appropriate program or cost pool account is also assigned.
- Review of Invoices – The Accounting Assistant assembles a batch of invoices ready for payment. The CFO reviews the hard copy invoices for proper support and also views the bills in the accounting system verifying that the cost has been distributed to the correct general ledger account and grant or cost pool account. If corrections are needed, the CFO makes the correction in the system and advises the Accounting Assistant. The CFO “marks” those bills in the accounting system that are approved for check writing.
- Check Writing – The CFO retrieves the appropriate number of blank checks from the locked filing cabinet and laser prints the checks. He/she gives the checks to the Accounting Assistant who prints an accounting distribution for each payment. Each printed check is supported by the accounting distribution, the invoice and other pertinent information. The CFO reviews these packages and initials each recommended payment on the bottom part of a three part check.
- Check Signature – The CFO delivers the folder with the above to the President and CEO who thoroughly reviews each proposed payment. Checks that pass this scrutiny are signed and returned to the Accounting Assistant to be mailed and distributed.

NOTE: All checks are pre-numbered and are periodically reviewed to ensure that all printed, manual, unused, or voided checks are accounted for sequentially.

As described above, invoices are subjected to a three-step administrative review prior to payment in order to ensure accuracy and allow ability in accordance with OMB Circular A-122.

(f) Staff Payroll – Payroll services are provided by a commercial payroll service provider who is responsible for maintenance of payroll data; calculation of wages, taxes, and leave payments; creation of appropriate reports; and payment and filing of all necessary employer taxes and quarterly reports. All employees are required to have direct deposit of net pay to a financial institution as a condition of employment.

Times of attendance and hours worked are entered by employees on bi-weekly timesheets. At the end of each bi-weekly 70 hour pay-period, timesheets are summarized by hours worked, paid leave, etc., and signed by the employee. Timesheets are reviewed and signed by the immediate supervisor (and by the next level supervisor, if applicable) and forwarded to the fiscal unit. The fiscal unit posts staff time on payroll transmittal sheets and forwards to the payroll service bureau. A preprocess payroll register is printed and reviewed before the payroll is approved for payment.

The payroll vendor is responsible for the preparation of payroll checks and all necessary filings and deposits. Paychecks are normally delivered by courier within 24 hours in a sealed package that is signed for and given directly to the President and CEO or other person independent of the payroll process for opening of the package and review.

Information on payroll reports are sorted by program and general journal entries are made by the fiscal staff and verified by AAWDC's CFO. Checks/earnings statements are stored in a locked file cabinet until distributed.

(g) Participant Payroll

- Senior Program: Participant payroll is processed as a separate payroll using the procedures described above. Participant sign-in sheets are approved by Senior Program staff and posted to payroll input sheets and forwarded to the AAWDC fiscal unit. AAWDC's fiscal staff reviews participant timesheets and input sheets and transmits to the payroll service. Participant paychecks/earnings statements are delivered with the regular payroll and reviewed by the President and CEO. Participant paychecks/earnings statements are mailed by the fiscal unit at the same time as other paychecks/earnings statements.
- Youth Programs: For youth programs, particularly summer jobs programs, youth stipends/wages are paid in the regular payroll account using a separate program/organization code.

- (h) Stipend Payment System – Stipend checks are produced based on the recommendations of Career Developers in accordance to the requirements of their individual programs. Stipend payments follow the accounts payable procedures. Whenever possible, stipend checks will be made out to the final recipient of the funds rather than the participant. Where applicable, the stipend obligation and payment will be recorded to the obligation log worksheet of the program in question. The participant must sign for any checks they are given including those made out to other parties.

NOTE: AAWDC's accounting system is capable of implementing the payroll function, and AAWDC reserves the right to produce its payroll in-house should such a move appear warranted.

5. All financial transactions are conducted, and records maintained, in accordance with GAAP.

6. AAWDC's cash management system is maintained to assure that no excess Federal dollars are kept on hand. The accounting process reports cash balances by funding source, which enables the identification of each specific cash balance for reporting purposes.
- (a) Receipt of Checks – Checks received by mail are logged into an electronic spreadsheet listing showing date of receipt, payor, check number, and amount by the Executive Assistant and forwarded to the fiscal unit. The recording of deposits, preparation of the deposit slip and the appropriate accounting transactions are performed simultaneously using the accounting system. The deposit slip, the accounting transactions and supporting checks are reviewed by the CFO prior to the deposit being made at the bank. Copies of all documents are made and later matched with the bank receipt. Bank deposits are made as necessary.
 - (b) Maintenance of Records – Copies of deposited checks and supporting documents are filed in date order.
 - (c) Disbursements - Disbursements are accomplished through the Accounts Payable System (see Section III. F. 4(e), “Accounts Payable Procedures”).
7. Cost Accounting
- (a) Whenever possible, costs are charged directly to the appropriate grant/program. Specific transactions are often split between grants/ program when appropriate.
 - (b) AAWDC utilizes three cost pools: an Administrative Cost Pool, a Program Cost Pool and an Executive and Administrative Cost Pool. Additional approved cost pools may be used when circumstances warrant such as the American Recovery and Reinvestment Act of 2009 or when cost/benefit relationships change significantly due to new grants and other factors.
 - (c) Cost pools and their respective distribution methods are subject to review/audit during the annual A-133 audit.
 - (d) Staff charge their time to the grants/program(s) on which they work on the bi-weekly timesheets. Hours are recorded in a labor-hour distribution report, which identifies labor hours and costs per grant and pool. Costs are entered into the accounting system by grant/cost pool via journal entry.
 - (e) AAWDC maintains separate accounts in the automated accounting system to record and accumulate indirect costs associated with each cost pool. AAWDC selects that method which is determined to be in its best interest.
 - (f) Specifics about cost pools:
 - (1) Administrative Cost Pool – This cost pool is distributed to Adult, Dislocated Worker and Youth based on the relative level of funding in the three program accounts. This is method was authorized by WIFI No. 4-07 Change 1.
 - (2) The Program Cost Pool – This cost pool is distributed to the Adult and Dislocated accounts using one of the following methods:

Direct Expenses - Under this method, each grant's direct expenses are used to calculate its relative percentage share of the total expenditures. That percentage is applied to the cost pools to distribute the appropriate share of pooled costs to each grant.

Number of Participants - Under this method, the relative number of participants served by each program (based on MIS records) is used to determine the percentage split of the cost pool.

- (3) The Executive and Administrative Cost Pool – This pool captures certain indirect costs such as the salaries of President and CEO, the Executive Assistant, the fiscal staff and the costs to operate the Millersville office which are not practical nor accurate to charge directly to benefiting programs. The pool is a component of the annual calculation of an indirect cost rate complying with the cost principles of OMB Circular A-122, paragraph C. This rate is applied to non-WIA grants. Costs that are not allocable to non-WIA grants are assigned to WIA Administrative funds, the Program Cost Pool and Local (County) funds on an equitable basis.

NOTE: AAWDC will periodically review the utility and benefit of the above cost pools and allocation methodology, and will modify the process if such a modification will be more fair and accurate. The distribution option selected as the cost methodology of choice will be used to distribute costs through the entire fiscal year.

Cost-allocation plans for One-Stop Centers adhere to those policies and procedures established by DLLR.

8. Other

AAWDC uses newer processing methods when efficient, effective and adequate financial controls can be assured. Examples include using third party vendors to collect cash through credit card payments and using debit cards for authorized payments to recipients.

9. Audits

All governmental and non-profit organizations must follow the audit requirements of OMB Circular A-133. An annual financial and compliance audit will be conducted and submitted to the Maryland Department of Labor, Licensing, and Regulation, Division of Workforce Development, within thirty (30) days after the completion of the audit report, but no later than nine (9) months after the end of the audit period. Furthermore, the local WIB or fiscal agent insures that all required sub-recipient audits and all sub-recipient audit resolution procedures are completed.

9. Debt Collection

AAWDC will comply with debt-collection procedures, as identified in the WIA regulations. If a debt is established as the result of an audit finding, or through the AAWDC's fiscal monitoring activities, AAWDC will, whenever possible, reduce any payments due the debtor to satisfy the debt. In such circumstances, AAWDC will require the debtor to continue to provide services at existing levels, whenever feasible. AAWDC may also elect to pursue cash collection from non-grant sources to satisfy repayment of

debt. However, AAWDC recognizes that cash repayment of debts is not always possible. In such instances, AAWDC may choose to accept allowable services in lieu of cash as a satisfactory alternative. Such services would be in addition to those provided under any existing agreements. If debts are not satisfied through voluntary means, such as those outlined above, AAWDC will request that formal collection proceedings be commenced.

G. LOCAL WORKFORCE INVESTMENT BOARD (LWIB) - CHIEF LOCAL ELECTED OFFICIAL (CLEO) WORKING AGREEMENTS (See Attachment 12)

Per the requirements of WIA, the County Executive and the WIB agree to the following items.

1. Appointments to the WIB

The County Executive will make appointments to the WIB based on the recommendations of local business service organizations, educational institutions, community-based organizations and local government officials. The WIB will solicit nominations, in accordance with the nominating requirements of WIA, and present them to the County Executive for acceptance or rejection.

2. Joint Areas of Responsibility

- a. The County Executive and the WIB acknowledge that any action relating to joint responsibility may be taken only with the concurrence of the County Executive and the WIB.
- b. The County Executive and the WIB agree that AAWDC, as the direct descendant of BWDC, meets the terms of the grandfather provision as approved by the State, and will serve as the One-Stop Operator under the terms of the approved grandfather provision.
- c. The County Executive and the WIB agree that AAWDC will serve as the administrative entity for WIA.
- d. AAWDC, with input from the County Executive, the WIB, WIA One-Stop partners, and the public at large is assigned the responsibility for development of the local plan.
- e. A One-Stop partner may be identified as an Intensive Service Provider as part of the MOU process. The One-Stop Operator may procure other intensive services, as described in the procurement section of this plan.
- f. Administrative support for the WIB will be provided by AAWDC.
- g. The County Executive and the WIB will delegate program monitoring and oversight to the administrative entity and will require AAWDC to provide quarterly oversight reports and recommend corrective action, as necessary.
- h. The County Executive and the WIB will delegate the negotiation of performance standards with the State to the administrative entity. Should the administrative

entity and the State be unable to reach agreement, representatives of the County Executive and the WIB will become a party to the negotiations.

- i. The County Executive and the WIB agree to establish the Youth Council as a subgroup of the WIB. The Youth Council chair, which will represent the private sector, is the only mandatory member from the WIB.
 - j. The Youth Council, in coordination with AAWDC, will recommend to the WIB and the County Executive the designation of eligible youth providers.
3. The County Executive acknowledges serving as the local grant recipient and will be liable for any misuse of the grant funds allocated to Anne Arundel County under the Workforce Investment Act.
 4. Administrative Issues
 - a. The County Executive acknowledges that designation of AAWDC as the grant sub-recipient does not relieve the County of the liability for any misuse of grant funds.
 - b. AAWDC, the administrative entity, will administer such funds in compliance with WIA and its regulations; Federal, State, and County laws and regulations; and in compliance with the fiscal controls section of this plan.
 - c. The WIB will hold meetings at regularly scheduled times and as needed, in accordance with the by-laws.
 - d. The County Executive and the WIB acknowledge that any dispute resulting from non-concurrence between the County Executive and the WIB will be resolved as expeditiously as possible by either reaching concurrence on their own, or by appointing ad hoc committees from their membership to confer and resolve the dispute.

H. RESPONSIBILITIES OF THE ONE-STOP SERVICE DELIVERY SYSTEM

1. AAWDC, in its identity as immediate descendant of BWDC, meets the test for existing One-Stop Operators, as described in WIA. The County Executive and the WIB jointly agree (Attachment 2) to designate the Anne Arundel Workforce Development Corporation (AAWDC) as the One-Stop Operator, exercising the grandfather option (See WIFI 7-99).
2. The role and responsibilities of the One-Stop Operator shall be as follows.
 - Coordinate One-Stop system services on behalf of the WIB.
 - Provide comprehensive services in the One-Stop Center.
 - Oversee the integration of services as proposed by the WIB and agreed to by all partners.
 - Manage fiscal responsibility for the Center.

- Evaluate performance and implement required actions to meet standards.
 - Evaluate customer needs and satisfaction data to continually refine and improve service strategies.
 - Plan and report responsibilities.
 - Act as liaison with the WIB.
 - Monitor adherence to the provisions of the Memorandum of Understanding.
 - Market One-Stop services.
 - Recruit additional partners.
 - Define and provide means to meet common operational needs (i.e., training, technical assistance, additional resources), etc.
 - Facilitate the sharing and maintenance of data.
 - Clearly define and communicate the strategic objectives of the WIB to the One-Stop Center partners.
 - Continuously assess customer needs, and make recommendations to the WIB on the need for additional access points or specialized centers.
 - Respond to community needs.
 - Facilitate groups/teams on common issues --- what works, what doesn't.
3. AAWDC, as immediate descendent and successor organization of BWDC, qualifies as the One-Stop operator under the WIA grandfather clause, Section 121(c) (WIFI 7-99). By agreement of the County Executive and the WIB, BWDC met the fiduciary and JTPA performance requirements that enabled Anne Arundel County to qualify as a Workforce Investment Area, and was designated the One-Stop Operator. AAWDC in partnership with DLLR, Division of Workforce Development, operates comprehensive and full-service One-Stop Career Centers in Glen Burnie, Hanover, and Annapolis.
4. The comprehensive One-Stop Centers will provide access to all WIA Title I services and will coordinate the delivery of all partner services in a manner that will accommodate, to the extent possible, the needs of all system users. Fee-for-service activities may be developed and implemented at the comprehensive One-Stop Centers. The One-Stop Centers will also be responsible for all WIA-related system reporting.

Partner sites will provide core and some intensive services, labor market information, and access to the One-Stop Center Operator. Partner sites will provide appropriate performance data to the One-Stop Center Operator for purposes of reporting to the WIB and the State.

5. A customer-satisfaction instrument has been developed to assess both job seeker and business customer satisfaction. This questionnaire is given to each One-Stop job seeker customer and to each business that receives services from the One-Stop system.
6. Performance by the One-Stop system and Operator will be reviewed and evaluated by the WIB using WIA performance indicators, as agreed to by the GWIB, LWIB, and the County Executive.
7. The AAWDC has been authorized by the County Executive and the WIB to negotiate MOUs with partner agencies on their behalf.

I. CONTINUOUS IMPROVEMENT/CONSUMER REPORT

As a member of the U.S. Department of Labor Enterprise system for quality management, BWDC was committed to the Baldrige principles of continuous improvement and customer service. Maintenance of quality review of system processes is, and will continue to be, an ongoing function of AAWDC's management of the One-Stop system.

The pulse of consumers is tapped at several points in their progress through the delivery system, including, but not limited to, orientation, post-training (both pre-vocational and occupational), at placements, and during follow-up. Questionnaires, services, anecdotal material, and training performance reviews are used to evaluate the quality of service provided and the degree of customer satisfaction achieved.

Approved by LWIB June 2009.