

WESTERN MARYLAND'S LOCAL WORKFORCE PLAN

2024-2028



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EXECUTIVE SUMMARY

The **Western Maryland Local Workforce Plan 2024-2028** provides a comprehensive framework to strengthen the regional workforce system. It outlines strategies to address economic and labor market challenges while ensuring alignment with state and federal workforce policies. Key highlights include:

- **Economic Analysis:** Western Maryland's economy is driven by healthcare, manufacturing, transportation, and tourism. The region faces workforce retention challenges and skill shortages in high-demand sectors.
- **Industry and Occupational Trends:** Growth industries include advanced manufacturing, IT, and renewable energy. Key in-demand occupations range from healthcare practitioners to skilled trades and logistics professionals.
- **Workforce Development Strategies:** The plan prioritizes increasing job training access, expanding apprenticeships, and improving employer engagement to meet workforce demands.
- **Initiatives to Expand Access:** Strategies focus on expanding access to workforce programs for veterans, individuals with disabilities, and justice-involved populations.
- **American Job Center (AJC) Service Delivery:** Efforts will enhance the efficiency of AJCs, strengthen service integration, and increase outreach to underserved communities.
- **Performance Accountability:** The Board will use data-driven methods to measure program effectiveness and ensure continuous improvement.

Through these initiatives, the WMWDB aims to create a workforce that is competitive, adaptable, and equipped for long-term success. By aligning with Maryland's strategic pillars, the Board ensures a future-ready workforce that drives economic prosperity in Western Maryland.

BOARD BACKGROUND & LEADERSHIP

The Western Maryland Workforce Development Board (WMWDB) serves Allegany, Garrett, and Washington counties, a region defined by its rural landscape, strategic transportation corridors, and a diverse industrial base. The WMWDB, in partnership with local elected officials, leads workforce development efforts by fostering collaboration among employers, job seekers, training providers, and community organizations. The Board's mission is to build a skilled workforce that meets employer needs, strengthens the local economy, and enhances career opportunities for residents.

To develop this plan, the Board engaged a broad range of stakeholders, including business leaders, education institutions, workforce professionals, and community-based organizations. Public forums, industry roundtables, and data-driven labor market analyses informed the plan's strategic priorities.

VISION FOR WESTERN MARYLAND'S WORKFORCE SYSTEM

The WMWDB envisions a workforce system that is responsive to industry demands, inclusive of diverse job seekers, and aligned with Maryland's broader economic strategies. The region faces challenges such as skill gaps in key industries, workforce retention, and limited access to training in rural areas. To address these, the Board's strategy focuses on:

- Expanding career pathways in high-demand sectors like healthcare, manufacturing, IT, and transportation.
- Enhancing workforce participation through targeted outreach to underrepresented groups, including individuals with disabilities, returning citizens, and dislocated workers.
- Strengthening partnerships with employers to develop customized training and work-based learning opportunities.
- Leveraging technology and virtual services to improve accessibility to job training and employment resources.

COMMITMENT TO ALIGNING WITH THE FOUR CORE STRATEGIC PILLARS

The WMWDB aligns its strategy with Maryland's Four Core Strategic Pillars: Supercharging Key Sectors, Advancing Access, Preparing the Future Workforce, and Improving System Alignment and Accountability.

1. **Supercharging Key Sectors**
Utilize labor market data to identify and address skills gaps in healthcare, manufacturing, and logistics.
Develop industry-driven apprenticeships and pre-apprenticeship programs.
Support incumbent worker training to help businesses upskill employees.
2. **Advancing Access**
Expand access to training for underserved populations, including veterans, English language learners, and individuals with disabilities.
Provide supportive services such as transportation vouchers, childcare assistance, and digital literacy training to reduce employment barriers.
Partner with social services and local agencies to deliver wraparound support for job seekers facing multiple challenges.
3. **Preparing the Future Workforce**
Strengthen partnerships with secondary schools, community colleges, and employers to create seamless career pathways.
Increase participation in youth-focused work-based learning programs, including internships and summer employment initiatives.
Promote STEM and technical training to align with the needs of the region's evolving economy.
4. **Improving System Alignment and Accountability**
Utilize data-driven decision-making to evaluate program effectiveness and workforce outcomes.
Streamline service coordination among American Job Centers, education providers, and economic development entities.
Enhance employer engagement strategies to ensure workforce programs are meeting real-time industry needs.

Through these strategic initiatives, the Western Maryland Workforce Development Board remains committed to fostering economic growth, advancing career opportunities, and creating a more resilient and skilled workforce for the region.

SECTION 1: ECONOMIC ANALYSIS

OVERVIEW OF REGIONAL ECONOMIC CONDITIONS

The Western Maryland Workforce Development Area encompasses Allegany, Garrett, and Washington counties. This region is characterized by its predominantly rural setting, Appalachian geography, and strategic transportation corridors, including the I-70/I-81 interchange and U.S. Route 40. Despite its rural nature, the region plays a pivotal role in Maryland's economy by serving as a gateway to the state's western borders. According to the Growth Industry and Growth Occupation tools provided by the Maryland Department of Labor, Western Maryland has distinct economic features, driven by its industrial diversity, workforce characteristics, and geographic advantages.

INDUSTRY ANALYSIS

Western Maryland is home to a number of key industries.

- 1. Healthcare and Social Assistance:** This sector remains the largest employer, supported by institutions such as UPMC Western Maryland, Meritus Health, and Garrett Regional Medical Center. In-demand occupations include Registered Nurses, Licensed Practical Nurses, Certified Nursing Assistants, and Medical Assistants. The aging population in the region further increases the demand for healthcare services, particularly in rural areas with limited access to providers.
- 2. Transportation and Warehousing:** Washington County benefits significantly from its location as a transportation and logistics hub. Key employers such as FedEx and Volvo drive this sector, which requires a steady supply of Heavy and Tractor-Trailer Truck Drivers, Material Movers, and Logistics Coordinators. The presence of three major interstates supports this sector's continued growth.
- 3. Manufacturing:** The manufacturing sector remains a cornerstone of the regional economy, with companies like Beitzel Corporation and Oshkosh playing pivotal roles. Occupations in demand include Industrial Machinery Mechanics, Welders, Machinists, and Electrical Engineers. These roles require specialized training, which is supported by local technical programs and apprenticeships.
- 4. Education and Local Government:** Public administration and educational institutions are significant contributors to employment in the region. Demand is consistent for K-12 educators, administrative staff, and IT support personnel.
- 5. Hospitality and Tourism:** Garrett County's attractions, including Deep Creek Lake, drive this sector. Seasonal and full-time opportunities abound in positions such as Food Service Managers, Cooks, Hotel Staff, and Retail Associates.
- 6. Retail Trade:** Concentrated in urban centers like Hagerstown and Cumberland, retail remains a vital sector. Roles include Retail Salespersons, Cashiers, and First-Line Supervisors. Retail businesses increasingly emphasize digital skills for e-commerce operations.

EMERGING INDUSTRIES

Emerging sectors in the region include:

1. Information Technology: The region's collaboration with the IT Center of Excellence has fostered growth in roles such as Computer User Support Specialists, Software Developers, and Cybersecurity Analysts. These roles support both regional businesses and broader digital transformation efforts.

2. Renewable Energy: The adoption of green energy initiatives, particularly solar power, is creating demand for Solar Installation Technicians and Renewable Energy Specialists. Garrett County has been a focal point for training programs in this sector.

3. Advanced Manufacturing: Investment in automation and precision technologies is driving the need for CNC Machinists, Robotics Technicians, and Quality Assurance Specialists.

4. Information Technology: The region's collaboration with the IT Center of Excellence has fostered growth in roles such as Computer User Support Specialists, Software Developers, and Cybersecurity Analysts. These roles support both regional businesses and broader digital transformation efforts.

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EMPLOYMENT NEEDS OF BUSINESSES

Businesses across sectors report challenges in recruiting and retaining skilled talent. Key employment needs include:

1. Workforce Development in Healthcare: There is a critical need to expand the pipeline of qualified healthcare professionals to address shortages in nursing and allied health fields. Initiatives such as increased nursing program enrollments and partnerships with regional colleges aim to mitigate this challenge.

2. Logistics and Transportation Workforce: The demand for CDL drivers, logistics specialists, and warehousing staff is driven by the region's robust transportation sector. Employers emphasize the need for candidates with safety certifications and logistical planning skills.

3. Technical and Digital Proficiency: Across industries, businesses seek employees skilled in technology tools, project management, and data analytics. This need spans sectors such as IT, advanced manufacturing, and retail.

4. Customer-Facing Roles in Retail and Hospitality: High turnover rates in these industries necessitate a continuous focus on recruiting customer service-oriented individuals.

COMPARISON TO REGIONAL ECONOMIC CONDITIONS

Western Maryland's economic conditions reflect broader statewide trends but also exhibit unique characteristics:

1. Rural Workforce Challenges: Geographic isolation and lower population density impact workforce availability and commuting patterns, particularly in Garrett and Allegany counties. Employers often struggle to attract talent from outside the region due to limited public transportation and housing.

2. Strategic Role in Logistics: Washington County's proximity to major interstates and its role as a logistics hub differentiate it from other parts of the state. The presence of large-scale distribution centers positions the county as a critical node in supply chain networks.

3. Tourism-Centric Economy: Garrett County's tourism industry distinguishes it from neighboring counties. Seasonal demand for workers creates both opportunities and challenges in maintaining a stable workforce.

4. Educational Attainment Gaps: The region lags behind state and national averages in bachelor's degree attainment but exceeds the national average for associate degrees. This reflects the strong presence of community colleges and technical programs in the area.

DIFFERENTIATING FACTORS AND LOCAL CONTRIBUTIONS

Western Maryland contributes uniquely to the regional and state economies in several ways:

1. Robust Workforce Development Partnerships: Collaborations with Allegany College, Garrett College, and Hagerstown Community College enhance workforce readiness. These institutions offer tailored training programs, such as nursing certifications, CDL licensing, and IT skill-building.

2. Sector-Specific Initiatives: Programs like EARN Maryland and solar installation training partnerships address specific industry needs, fostering workforce alignment with emerging opportunities.

3. Resilience in Manufacturing: Despite national declines, local manufacturers leverage regional assets such as proximity to raw materials and a skilled labor pool to remain competitive.

4. Innovative Approaches to Education: Partnerships with K-12 schools and post-secondary institutions emphasize career pathways, apprenticeship programs, and experiential learning to prepare students for high-demand careers.

In conclusion, Western Maryland's economic landscape is defined by its diverse industries, unique geographic advantages, and proactive workforce development strategies. Addressing challenges such as educational attainment gaps and workforce shortages while leveraging regional strengths positions Western Maryland for sustainable economic growth and resilience.

SECTION 2: STRATEGIC PLANNING

PART 1: ALIGNING MARYLAND'S STRATEGIC PILLARS

Maryland's workforce development vision is guided by its Four Core Strategic Pillars: Supercharge Key Sectors, Advance Access, Preparing the Future Workforce, and Improving System Alignment and Accountability.

The Western Maryland Workforce Development Board (WMWDB) aligns with these pillars by leveraging local resources, collaborating with core program entities, and implementing strategies tailored to the region's unique needs.

A. STRATEGY TO ALIGN RESOURCES WITH STRATEGIC VISION AND GOALS

To achieve Maryland's strategic goals, WMWDB partners with core program entities such as:

- Local community colleges (Hagerstown Community College, Allegany College, and Garrett College) provide both vocational training and Adult Education and Literacy Services.
- The Maryland Department of Labor
- Vocational rehabilitation services are provided by the Maryland Department of Education's Division of Rehabilitative Services.
- The departments of social services
- Other key local partners

These partners regularly convene to ensure alignment of services to address employer and job seeker needs. Through formalized agreements such as the Memorandum of Understanding and Resource Sharing Agreement (RSA), the mandated facilities facilitate a coordinated approach to providing workforce services at American Job Centers (AJCs). Industry-specific forums identify skill gaps and guide curriculum development for in-demand occupations, such as those highlighted in the Growth Industry and Occupation tools.

B. FACILITATING CAREER PATHWAYS DEVELOPMENT

The WMWDB collaborates with training providers and core programs to create career pathways that integrate education, training, and supportive service strategies:

Participants can access multiple core programs, such as Title I and adult education, at the area's American Job Centers. This creates seamless support for job seekers and businesses. Career pathways emphasize credentials that build progressively toward advanced roles in healthcare, manufacturing, and IT. Partnerships with local employers ensure training aligns with real-world job requirements, such as apprenticeships in logistics and solar energy installation.

C. LOCAL AREA WORKFORCE DEVELOPMENT PROGRAMS

WMWDB's programs support Maryland's strategic vision by providing:

Customized Training: Programs like Maryland EARN and incumbent worker training address sector-specific skill shortages.

Youth Services: Through partnerships with secondary schools, the board supports career exploration, internships, and apprenticeships.

Supportive Services: Job seekers facing barriers benefit from transportation assistance, childcare subsidies, and access to mental health resources.

D. ENSURING ALIGNMENT WITH THE STATE'S STRATEGIC PILLARS

1. Supercharge Key Sectors - Utilizing Maryland Labor's Growth Industry and Growth Occupation tools, the Board will identify high-demand sectors such as healthcare, transportation, and advanced manufacturing. Partnering with community colleges, the Board will work to map existing training assets and address gaps through program development.

2. Advance Access - The Board will establish partnerships with social services and community organizations to streamline access to housing assistance, food programs, and healthcare.

3. Prepare the Future Workforce - The Board will work to increase participation in Registered Apprenticeships (RAs); collaborate with high schools, community colleges, and local employers to promote apprenticeships as viable career pathways; and work to boost the attainment of Industry-Recognized Credentials

4. Improve System Alignment and Accountability - Through conducting regular partner meetings to evaluate progress and address challenges, the Board and the local workforce partners work to improve system alignment in real-time.

Through coordinated efforts and alignment with Maryland's Four Core Strategic Pillars, WMWDB is committed to strengthening the region's workforce ecosystem. By supercharging key sectors, advancing access, preparing the future workforce, and improving system alignment, the board ensures that Western Maryland's workforce is prepared to meet current and future economic demands.

SECTION 2: SECTOR STRATEGIES FOR EMERGING AND IN-DEMAND INDUSTRIES

A. KNOWLEDGE AND SKILLS NEEDED TO MEET LOCAL BUSINESS NEEDS

The Western Maryland Workforce Development Board (WMWDB) continuously analyzes the knowledge and skills required to meet the needs of businesses in key sectors, including healthcare, advanced manufacturing, transportation, information technology, and clean energy. Specific skills in demand include:

- **Healthcare:** Clinical expertise (e.g., nursing, medical assisting), administrative competencies, and certifications such as Basic Life Support (BLS) and Advanced Cardiovascular Life Support (ACLS).
- **Manufacturing:** Skills in CNC machining, robotics, and industrial maintenance, supported by certifications like OSHA safety and Lean Six Sigma.
- **Transportation and Logistics:** CDL licensure, fleet management, and proficiency in supply chain technology.

- **Information Technology:** Cybersecurity, data analysis, and networking certifications such as CompTIA Security+ and AWS.
- **Clean Energy:** Solar panel installation, energy efficiency auditing, and sustainable engineering practices.

B. ANALYSIS OF THE WORKFORCE

The region's labor force is characterized by:

- **Employment Trends:** Western Maryland has experienced growth in transportation, healthcare, and logistics, but faces challenges in retaining talent in advanced manufacturing and IT.
- **Unemployment Rates:** As of the latest data, unemployment rates hover around 3.5%, with higher unemployment among individuals with barriers such as limited educational attainment or disabilities.
- **Educational Attainment:** Only 14% of residents hold a bachelor's degree, but 9.5% have associate degrees, reflecting the strength of community college programs.

Key populations with barriers include:

- **Ex-Offenders:** High recidivism rates necessitate targeted support for reentry into the workforce, particularly in industries like transportation and logistics.
- **Individuals with Disabilities:** Vocational rehabilitation programs provide essential support, but gaps remain in accessibility to training.
- **Low-Income Individuals:** TANF and SNAP recipients require wraparound services to overcome challenges such as childcare and transportation.
- **Older Workers and Veterans:** These groups often require reskilling or upskilling to transition into emerging industries.

C. WORKFORCE DEVELOPMENT ACTIVITIES

Strengths

- **Education and Training:** Community colleges (Hagerstown, Allegany, Garrett) offer robust training aligned with local industry needs.
- **Partnerships:** Strong collaborations with Maryland Labor, vocational rehabilitation, and economic development agencies.
- **Supportive Services:** AJCs provide comprehensive services, including career counseling, transportation assistance, and digital literacy workshops.

Weaknesses

- **Access Barriers:** Rural geography limits transportation options and access to training facilities.
- **Limited Capacity:** Insufficient training providers on the Eligible Training Provider List (ETPL) for specialized fields like cybersecurity and clean energy.

- **Awareness and Outreach:** Employers and job seekers often lack awareness of available workforce development resources.

D. ALIGNMENT WITH CAREER PATHWAYS MODEL

The Workforce Development Board is dedicated to employing the following strategies to enhance career pathway models:

1. Sector Focus

- **Cybersecurity:** Partner with IT companies and colleges to expand programs such as CompTIA and CISSP certifications.
- **Healthcare:** Develop career pathways for CNAs to transition into nursing roles through stackable credentials.
- **Clean Energy:** Expand training for solar installation and energy efficiency auditing in collaboration with industry leaders.
- **Infrastructure:** Engage construction firms to develop apprenticeships in skilled trades.
- **Manufacturing:** Focus on automation and robotics training programs.

2. Employer Engagement

- **Understanding Workforce Needs:** Regularly conduct employer surveys and host industry roundtables to identify skill gaps.
- **Participation in Workforce Development:** Offer incentives such as wage subsidies, tax credits, and training reimbursements to encourage employer engagement.

3. Collaboration with Partners

- **ETPL Recruitment:** Work with training providers to develop high-quality programs and guide them through the ETPL application process.
- **Apprenticeship Development:** Collaborate with industry associations and community colleges to create registered apprenticeships.
- **On-the-Job Training (OJT):** Provide funding and technical assistance to employers to develop OJT programs, ensuring a pipeline of skilled workers.

4. Supporting Employers

- **Customized Solutions:** Offer tailored workforce solutions, such as incumbent worker training, to address specific business needs.
- **Diversity and Inclusion:** Help employers implement DEI strategies and recruit from underrepresented populations.
- **Retention Strategies:** Support employers with training in employee engagement and retention to reduce turnover.

By aligning workforce development activities with the career pathways model, engaging employers, and targeting key sectors, the WMWDB ensures that Western Maryland's workforce remains competitive and responsive to industry needs. Strategies to address barriers and expand access to training will enhance economic opportunities for all residents while meeting the employment demands of local businesses.

SECTION 3: AMERICAN JOB CENTER DELIVERY SYSTEM

A. LIST THE AJCS IN YOUR AREA, INCLUDING ADDRESS AND PHONE NUMBERS. PROVIDE THE ONE-STOP OPERATOR FOR EACH SITE, AND WHETHER IT IS A COMPREHENSIVE OR SATELLITE CENTER.

Below is the list of AJCs in the Western Maryland Workforce Development Area, including their addresses, phone numbers, and classifications:

Allegany County One-Stop Job Center

Address: McMullen Building, 138 Baltimore Street, Suite 102, Cumberland, MD 21502

Phone: 301-777-1221

Classification: Comprehensive Center

One-Stop Operator: Pinnacle Strategies, LLC

Western Maryland Consortium - Allegany County Office

Address: 152 Baltimore Street, Suite 100, Cumberland, MD 21502

Phone: 301-262-7329

Classification: Satellite Center

Washington County One-Stop Job Center

Address: 14 North Potomac Street, Hagerstown, MD 21740

Phone: 301-393-8200

Classification: Comprehensive Center

One-Stop Operator: Pinnacle Strategies, LLC

Western Maryland Consortium - Washington County Office

Address: 33 West Washington Street, Hagerstown, MD 21740

Phone: 301-791-3164

Classification: Satellite Center

Western Maryland Consortium - Garrett County Office

Address: 23789 Garrett Highway, McHenry, MD 21550

Phone: 301-334-8136

Classification: Satellite Center

One-Stop Operator: Pinnacle Strategies, LLC

B. DESCRIBE YOUR CUSTOMER FLOW SYSTEM AND PROCESS USED IN THE LOCAL AREA. THIS DESCRIPTION SHOULD INCLUDE ELIGIBILITY ASSESSMENT, INDIVIDUALIZED TRAINING PLANS, AND CASE MANAGEMENT. DWDAL'S POLICY ON ASSESSMENTS CAN BE FOUND HERE: [HTTPS://LABOR.MARYLAND.GOV/EMPLOYMENT/MPL/MPL10-21.PDF](https://labor.maryland.gov/employment/mpl/mpl10-21.pdf).

The customer flow system in Western Maryland is designed to provide seamless, customer-focused service delivery at the American Job Centers (AJCs). This system is structured to guide job seekers from their initial engagement through to employment or training, using a "no wrong door" approach, ensuring accessibility and minimizing service duplication.

Upon entering the AJC, a greeter performs an informal assessment to understand the job seeker's needs and provide an overview of the services available. Job seekers are oriented to AJC services, including job search assistance, career counseling, and training programs. Customers are assisted with registering in the Maryland Workforce Exchange (MWE) to track their job searches and career services.

Staff conduct eligibility assessments to determine qualification for WIOA Title I programs, including Adult, Dislocated Worker, and Youth Services. Necessary documentation is collected, such as proof of income, employment status, and other eligibility criteria aligned with federal and state guidelines. Staff use career exploration tools, labor market information (LMI), and one-on-one counseling to identify skill gaps and career interests. An IEP is developed collaboratively with the customer, detailing career goals, training needs, and supportive services required to achieve employment outcomes. Customers are referred to eligible training providers listed on Maryland's Eligible Training Provider List (ETPL).

They can access Individual Training Accounts (ITAs) to fund in-demand training programs. Each participant is paired with a career counselor who provides ongoing support, tracks progress, and addresses barriers to employment or training. Career counselors conduct follow-ups via phone, email, or in-person meetings to ensure participants are on track with their plans. Assistance with transportation, childcare, and other resources is provided to address barriers identified during the IEP development. Case notes and documentation in the MWE system are maintained to track participant progress and outcomes.

Job seekers receive support in matching their skills to job openings, resume writing, and interview preparation. Staff facilitate connections with employers, including on-the-job training (OJT) opportunities, incumbent worker training, and apprenticeship placements. Post-employment support is provided for up to 12 months to ensure job retention and address any challenges that arise.

The MWE serves as the primary platform for case management, enabling staff to document eligibility, services provided, and employment outcomes. This system ensures that each job seeker receives tailored services that align with their individual goals, ultimately leading to sustainable employment. The process adheres to DWDAL's policies and utilizes standardized assessment tools as outlined in the Maryland Policy Issuance MPI 10-21.

C. DESCRIBE THE PROCESS YOUR BOARD INTENDS TO USE FOR THE SOLICITATION AND SELECTION OF A ONE STOP OPERATOR. (SECTION 107 OF WIOA)

The Western Maryland Workforce Development Board (WDB) follows a transparent and competitive process for soliciting and selecting a One-Stop Operator (OSO) as required by Section 107 of the Workforce Innovation and Opportunity Act (WIOA). The process ensures compliance with WIOA regulations, promotes fairness, and guarantees that the selected OSO will enhance the effectiveness of the local workforce development system.

The WDB creates an RFP outlining the requirements, responsibilities, and expectations for the One-Stop Operator. The RFP specifies performance benchmarks, reporting requirements, and the operational framework for the American Job Center (AJC) delivery system. The RFP is widely distributed to ensure maximum participation, including posting on the WMWDB's website, local government procurement portals, and other public platforms. Notifications are sent to community-based organizations, education providers, workforce development entities, and private organizations to encourage diverse applications.

A pre-bid conference may be held to provide potential bidders an opportunity to ask questions and seek clarification regarding the RFP requirements. Proposals are reviewed to ensure they meet the minimum criteria specified in the RFP, including eligibility, experience, and financial and organizational capacity. An evaluation committee is formed, comprising impartial members from the WMWDB, local government, and key stakeholders. Members are required to disclose potential conflicts of interest. The committee evaluates proposals using a scoring rubric that includes:

- Alignment with WIOA goals and local workforce strategies.
- Experience and qualifications in managing workforce systems.
- Cost-effectiveness and resource management.
- Strategies for fostering collaboration among workforce partners.

Based on the evaluation, the committee makes a recommendation to the WMWDB. The Board approves the final selection. Once selected, the WMWDB enters into negotiations with the chosen OSO to finalize terms and conditions, including performance metrics and reporting requirements. A formal contract is executed, detailing the OSO's responsibilities, operational guidelines, and compliance expectations. The selection of the OSO is publicly announced to maintain transparency.

D. DESCRIBE HOW YOUR BOARD WILL ENSURE THE CONTINUOUS IMPROVEMENT OF ELIGIBLE PROVIDERS OF SERVICES THROUGH THE SYSTEM AND ENSURE THAT SUCH PROVIDERS MEET THE EMPLOYMENT NEEDS OF LOCAL BUSINESSES, WORKERS, AND JOBSEEKERS. DWDAL'S POLICY ON THE ELIGIBLE TRAINING PROVIDER LIST CAN BE FOUND HERE: <HTTPS://LABOR.MARYLAND.GOV/EMPLOYMENT/MPI/MPI11-21.PDF>.

The Western Maryland Workforce Development Board (WMWDB) is committed to ensuring continuous improvement of eligible providers of services through rigorous oversight, performance monitoring, and collaboration with local businesses and jobseekers. This approach aligns with the Maryland Department of Labor's (DWDAL) policy on the Eligible Training Provider List (ETPL) and WIOA Section 122 requirements.

All training providers must meet the state's ETPL requirements, which include compliance with WIOA standards, financial and organizational stability, and alignment with in-demand industries and occupations in Western Maryland. Providers are required to submit data on program outcomes, including employment rates, median earnings, credential attainment, and completion rates, as part of the approval process. The WMWDB evaluates providers based on their ability to address the employment needs of local businesses, workers, and jobseekers. This includes ensuring training programs are designed to meet skill gaps in priority sectors such as healthcare, manufacturing, and logistics.

Providers must submit periodic performance reports, including:

- Enrollment and completion rates.

- Credential attainment.
- Employment and retention metrics.
- Wage outcomes.

Data is collected through the Maryland Workforce Exchange (MWE) and reviewed for accuracy and completeness. The WMWDB conducts regular on-site or virtual monitoring visits to verify that providers adhere to state and local performance standards. Monitoring includes:

- Observation of training delivery.
- Review of facilities, equipment, and resources.
- Feedback from participants and employers.

Providers are evaluated against key performance indicators, including the state-mandated benchmarks outlined in MPI 11-21. Providers that fail to meet these benchmarks are given an opportunity to submit corrective action plans.

Providers that consistently fail to meet performance standards or do not align with local workforce needs may be removed from the ETPL. This process includes:

- Notification of underperformance.
- Opportunity to address deficiencies through a corrective action plan.
- Removal if performance does not improve within the specified timeframe, as per MPI 11-21.

The WMWDB actively collaborates with the Maryland Department of Labor and other workforce boards to:

- Share data and insights on provider performance.
- Align training programs with state and regional workforce priorities.
- Promote access to high-quality training programs.

Through these strategies, the WMWDB ensures that eligible providers continuously improve and effectively meet the employment needs of local businesses, workers, and jobseekers.

E. DESCRIBE HOW YOU WILL FACILITATE ACCESS TO SERVICES PROVIDED THROUGH THE AJC DELIVERY SYSTEM, INCLUDING IN REMOTE AREAS, THROUGH THE USE OF TECHNOLOGY AND THROUGH OTHER MEANS.

The Western Maryland Workforce Development Board (WMWDB) is committed to ensuring access to services through the American Job Center (AJC) delivery system, particularly for individuals in remote

or underserved areas. The Board leverages technology, partnerships, and outreach strategies to extend the reach of workforce services.

- **Online Platforms:** The Maryland Workforce Exchange (MWE) provides jobseekers with online access to job listings, career exploration tools, and labor market information.
- **Virtual Workshops:** The AJCs offer workshops on resume writing, job search strategies, and interview preparation via video conferencing platforms.
- **Remote Counseling:** Career counseling and case management services are delivered virtually through phone, email, and video calls.
- **Mobile-Friendly Resources:** All key AJC services and resources are accessible via mobile devices to ensure convenience for users without desktop access.
- **Self-Service Kiosks:** Kiosks are placed in partner locations such as libraries and community centers to allow individuals to access job search tools and training opportunities.

The AJCs provide assistive technology, such as screen readers and magnifiers, to ensure accessibility for individuals with disabilities. Services are extended through partnerships with libraries, community action agencies, and other local organizations. Satellite centers provide basic career services and referrals to comprehensive AJCs for advanced support. AJCs in the region offer extended hours and weekend services to accommodate customers who cannot access services during regular business hours.

Collaborations with local schools, churches, and civic organizations raise awareness of available workforce services. Outreach efforts focus on underserved populations, including veterans, individuals with disabilities, and those with limited English proficiency. The WMWDB utilizes social media, email newsletters, and community bulletin boards to disseminate information about AJC services and events.

Partnerships with organizations such as the Department of Social Services (DSS), community colleges, and local management boards ensure services are accessible in non-AJC locations. Co-location agreements allow customers to access workforce services while visiting partner agencies for other needs. Employers are encouraged to participate in virtual and on-site job fairs, creating more opportunities for jobseekers to connect with local businesses.

Partnering with local transportation agencies to provide free or subsidized transit to AJC locations. Offering transportation vouchers for jobseekers to attend interviews or training programs. Language interpretation services, including phone-based translation lines, are available at all AJCs. Translated materials and bilingual staff ensure non-English-speaking customers can fully access services.

Surveys and community focus groups are conducted to identify service gaps and areas for improvement. The WMWDB tracks customer usage of virtual and remote services to evaluate their effectiveness and make necessary adjustments. By leveraging technology, partnerships, and outreach, the WMWDB ensures that workforce services are accessible to all residents of Western Maryland, regardless of their location or personal barriers. This approach aligns with WIOA's commitment to universal access and customer-centered service delivery.

F. DESCRIBE THE ROLES AND RESOURCE CONTRIBUTIONS OF THE AJC PARTNERS. (SEE DWDAL'S POLICY ON MEMORANDA OF UNDERSTANDING AND RESOURCE SHARING AGREEMENTS) [HTTPS://LABOR.MARYLAND.GOV/EMPLOYMENT/MPI/MPI4-21.PDF](https://labor.maryland.gov/employment/mpi/mpi4-21.pdf).

The Western Maryland Workforce Development Board (WMWDB) ensures that all American Job Center (AJC) partners contribute resources and expertise to deliver seamless, integrated workforce development services. Roles and resource contributions are formalized through **Memoranda of Understanding (MOUs)** and **Resource Sharing Agreements (RSAs)** in alignment with Maryland's Department of Labor (DWDAL) policy (MPI 4-21).

Each partner in the AJC delivery system plays a vital role in delivering services under the Workforce Innovation and Opportunity Act (WIOA). These roles include:

1. Title I - Adult, Dislocated Worker, and Youth Programs - Western Maryland Consortium

- Lead agency for workforce training, career counseling, and support services.
- Administers Individual Training Accounts (ITAs) and On-the-Job Training (OJT) contracts.
- Provides targeted services for priority populations such as veterans, individuals with disabilities, and low-income individuals.

2. Title II - Adult Education and Literacy - Garrett College, Allegany College of Maryland, and Hagerstown Community College

- Deliver basic education, GED preparation, and English as a Second Language (ESL) classes.
- Provide workplace literacy and career readiness training.
- Collaborate with Title I to align education programs with workforce needs.

3. Title III - Wagner-Peyser Act Employment Services - Md Dept. of Labor

- Provides labor exchange services, including job search assistance, reemployment workshops, and hiring events.
- Delivers services to unemployment insurance claimants.

4. Title IV - Vocational Rehabilitation Services - Maryland State Department of Education Division of Rehabilitation Services

- Supports individuals with disabilities through career counseling, assistive technology, and pre-employment transition services.

- Coordinates services with employers to facilitate hiring and retention of individuals with disabilities.

5. Temporary Assistance for Needy Families (TANF) - County Social Services

- Provide employment-focused programs for TANF recipients, such as job readiness training and subsidized employment opportunities.
- Deliver supportive services, including childcare, transportation, and housing assistance.

6. Community Services Block Grant (CSBG) Programs - HRDC, Garrett Community Action

- Offer supportive services like housing assistance, energy aid, and food security to low-income individuals.
- Facilitate referrals to workforce development programs for jobseekers.

7. Perkins Career and Technical Education Programs - Allegany College of Maryland & Hagerstown Community College

- Deliver industry-aligned training programs and credentials for in-demand occupations.
- Support participants through career counseling and academic advising.

8. Senior Community Service Employment Program (SCSEP) - Maryland Dept. of Labor

- Provides subsidized work experience for older adults seeking to re-enter the workforce.

9. Jobs for Veterans State Grant (JVSG) - Maryland Dept. of Labor

- Offer specialized services for veterans, including job matching, resume assistance, and access to priority services.

Each partner contributes resources in proportion to their role in the AJC system, as outlined in the RSAs. Partners contribute to the physical and operational costs of maintaining the AJCs, including rent, utilities, and technology. Partners allocate staff to provide direct services, including career counseling, case management, and administrative support.

Partners jointly host career readiness workshops, employer engagement events, and hiring fairs. Shared use of the Maryland Workforce Exchange (MWE) for case management and labor market information. Some partners provide space for satellite locations or community-based services. Partners supply computers, software, and printed materials for customer use.

Partners participate in strategic planning and workforce system evaluation to align goals and resources. Staff from various partner agencies receive training on each other's programs to ensure seamless service delivery.

The WMWDB fosters collaboration through regular partner meetings, joint staff training, and a shared commitment to serving customers efficiently. By leveraging the strengths of each partner, the AJC system maximizes resources and ensures comprehensive service delivery. This integrated approach ensures that the AJC system effectively meets the needs of jobseekers, workers, and businesses while adhering to WIOA and DWDAL guidelines.

G. DESCRIBE HOW YOUR BOARD WILL USE INDIVIDUALIZED TRAINING ACCOUNTS BASED ON HIGH-DEMAND, DIFFICULT-TO-FILL POSITIONS IDENTIFIED WITHIN LOCAL PRIORITY INDUSTRIES IDENTIFIED IN SECTION 1(A).

The Western Maryland Workforce Development Board (WMWDB) strategically utilizes Individualized Training Accounts (ITAs) to address skill gaps and labor shortages in high-demand, difficult-to-fill positions within local priority industries identified in Section 1(A) of the Strategic Plan. ITAs empower eligible participants to access training that leads to sustainable employment and aligns with employer needs.

Priority industries in Western Maryland include healthcare, manufacturing, transportation and logistics, information technology, and skilled trades. ITAs are allocated to support training programs that lead to employment in these sectors, addressing the needs of both jobseekers and employers. The WMWDB uses labor market information (LMI) and employer input to identify high-demand roles that are difficult to fill. Training programs are aligned with these occupational needs to ensure job placement opportunities post-completion.

ITAs are available to eligible WIOA Adult, Dislocated Worker, and Youth program participants. Participants must demonstrate a need for training to gain or retain employment in a high-demand occupation. ITAs are capped at \$6,000 per participant and support training programs up to two years in duration. Exceptions to the cap may be granted for specialized programs critical to regional workforce needs. Participants can select from training providers on Maryland's Eligible Training Provider List (ETPL), ensuring programs meet performance and quality standards. However, funding is not strictly limited to those providers on the ETPL. If local labor market data or employer demand supports it, funding may be allocated for training outside of the ETPL.

Career counselors conduct thorough assessments to identify participants' skills, interests, and career goals. An Individual Employment Plan (IEP) is developed, outlining the participant's training needs and career objectives. Participants select training programs from the ETPL that align with high-demand occupations and their career goals. Counselors provide guidance on program outcomes, costs, and labor market opportunities.

ITA requests are reviewed and approved by WIOA program staff to ensure alignment with eligibility criteria and funding availability. Payments are made directly to training providers on behalf of participants. Participants receiving ITAs may also access supportive services such as transportation, childcare, and tools necessary for training. These services address barriers to successful program completion.

Career counselors maintain regular contact with participants to monitor progress, provide guidance, and address challenges. Follow-up services are offered post-training to ensure job placement and

retention. The WMWDB collaborates with local businesses to identify skill shortages and design training programs that meet their workforce demands. Customized training opportunities, such as pre-apprenticeships or incumbent worker training, may complement ITAs. ITAs prioritize programs that lead to certifications or credentials in high-need areas, such as nursing (RN), commercial driver's licenses (CDL), and advanced manufacturing.

Through this strategic approach, the WMWDB ensures that ITAs effectively address workforce challenges, support jobseekers, and drive economic growth in Western Maryland.

H. DESCRIBE HOW YOUR BOARD WILL PROVIDE PRIORITY OF SERVICE THAT CONFORMS TO THE STATE PLAN. THIS SHOULD INCLUDE A DESCRIPTION OF ADDITIONAL LOCAL REQUIREMENTS OR DISCRETIONARY PRIORITIES, INCLUDING DATA TO SUPPORT THE NEED AND HOW THE LOCAL REQUIREMENT AND/OR PRIORITY WILL BE DOCUMENTED AND IMPLEMENTED FOR THE ADULT PROGRAM.

The Western Maryland Workforce Development Board (WMWDB) ensures priority of service for WIOA Title I Adult Program participants in accordance with federal law, Maryland's State Plan, and local workforce priorities. This approach targets individuals with significant barriers to employment, prioritizing services for those who need them most to achieve self-sufficiency and contribute to the local economy.

The LWDB provides priority of service to WIOA Title I Adult Program participants in the following order:

1. **Veterans and Eligible Spouses** who are also recipients of public assistance, low-income individuals, or individuals who are basic skills deficient.

Veterans are defined in 38 USC § 101(2) as a "person who served in the active military, naval, air, or space service, and who was discharged or released therefrom under conditions other than dishonorable." It is important to note that this definition does not include a minimum number of days of service; only that their discharge must not be dishonorable.

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

Further, 38 USC §101(24) and relevant guidance, the inclusion of "active" in the definition of a Veteran means any of the following:

- Active duty;
- Any period of active duty for training during which the individual concerned was disabled or died from a disease or injury incurred or aggravated in the line of duty;

- Any period of inactive duty training during which the individual concerned was disabled or died: (1) from an injury incurred or aggravated in the line of duty; or (ii) from an acute myocardial infarction, a cardiac arrest, or a cerebrovascular accident occurring during such training.

An "Eligible Person" as defined in 38 USC § 4101(5) and 38 USC § 4101(5) is:

- (1) The spouse of any person who died of a service-connected disability;
 - (2) The spouse of any member of the Armed Forces serving in active duty who, at the time of application for assistance under this chapter, is listed, pursuant to Section 556 of Title 37 and regulations issued thereunder, by the Secretary concerned in one or more of the following categories and has been so listed for a total of more than ninety (90) days:
 - a) missing in action;
 - b) captured in the line of duty by a hostile force, or
 - c) forcibly detained or interned in the line of duty by a foreign government or power; or,
 - (3) The spouse of any person who has a total disability permanent in nature resulting from a service-connected disability, or the spouse of a veteran who died while a disability so evaluated was in existence.
2. **Non-Covered Persons** who fall into WIOA statutory priority groups, including recipients of public assistance, low-income individuals, and those who are basic skills deficient.

WIOA also establishes the following individuals with barriers to employment as targeted populations for WIOA Title I services.

Target Populations: Individuals with Barriers to Employment
Displaced homeworkers
Eligible migrant and seasonal farmworkers
Ex-Offenders
Homeless individuals
Individuals facing substantial cultural barriers
Individuals with disabilities, including youth with disabilities
Individuals within two years of exhausting lifetime eligibility under Part A of the Social Security Act
Individuals who are English language learners

Target Populations: Individuals with Barriers to Employment
Individuals who are unemployed, including the long-term unemployed
Individuals who have low levels of literacy
Individuals without a High School Diploma
Low income individuals (including TANF and SNAP recipients)
Long-term unemployed individuals
Native Americans, Alaskan Natives, and Native Hawaiians
Older individuals
Single parents (including single pregnant women and non-custodial parents)
Veterans
Youth who are in or have aged out of the foster care system

The term “Low income individual” means an individual who received an income or is a member of a family that received a total family income, for the six-month period prior to registration for the program that, in relation to family size, does not exceed 70% of the USDOL Lower Living Standard Income Level. We will utilize the Maryland Department of Labor’s annual policy outlining the Lower Living Standard Income Level.

Additionally, the term “Low income individual” includes an individual receiving TANF and SNAP benefits during the six-month prior prior to application; an individual who qualifies as homeless under the Stewart B. McKenney Homeless Assistance Act; or any individual with a disability whose income meets the definition of low income, but who is a member of family whose income does not meet the definition.

Basic skills deficient individuals mean, with respect to an individual:

- (1) Who is a youth, that the individual has English reading, writing, or computing skills at or below an 8th-grade level on a generally accepted standardized test; or,
- (2) Who is a youth or adult, that the individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.
3. **Veterans and Eligible Spouses** who are not included in WIOA’s statutory priority groups.
4. **Local Priority Populations** identified by the LWDB or the Governor.

Based on regional needs, the WMWDB includes these discretionary priority groups:

- Long-Term Unemployed: Individuals unemployed for 27 weeks or longer.

- **Individuals with Disabilities:** Including youth and adults requiring specialized support to enter or remain in the workforce.
- **Justice-Involved Individuals:** Including those re-entering the workforce after incarceration.
- **English Language Learners (ELL):** Individuals facing language barriers that limit employment opportunities.
- **Unemployment Trends:** Western Maryland's unemployment rates have consistently been higher than state and national averages, with long-term unemployment affecting a significant portion of jobseekers.
- **Low-Income Populations:** The region has higher percentages of individuals living below the poverty line, necessitating targeted interventions.
- **Justice-Involved Individuals:** A significant number of justice-involved individuals return to the community each year, highlighting the need for reentry programs and supportive services.
- **ELL and Disability Statistics:** Data from community partners and local agencies show growing numbers of ELL jobseekers and individuals with disabilities requiring workforce assistance.

5. Non-Covered Persons outside the priority groups specified under WIOA.

The LWDB's structured and inclusive approach to priority of service ensures that veterans, low-income individuals, and those with barriers to employment are given the support they need to succeed. By incorporating local priorities such as low-income employed adults, the LWDB addresses specific regional challenges while remaining aligned with the State Plan. This ensures that Western Maryland's workforce system is responsive to the community's needs.

I. DESCRIBE HOW YOUR BOARD WILL UTILIZE FUNDING TO CREATE INCUMBENT WORKER TRAINING OPPORTUNITIES.

The Western Maryland Workforce Development Board (WMWDB) leverages Workforce Innovation and Opportunity Act (WIOA) funding to support incumbent worker training (IWT) programs that enhance the skills of the current workforce, improve business productivity, and help workers secure higher-paying, more stable jobs. These programs are strategically aligned with local priority industries and are designed to meet the needs of both employers and employees.

Incumbent worker training programs provide value to employees, employers, and the region. Employees receive improved skills and career advancement opportunities, enhanced job security, and increased earning potential. Employers gain increased productivity and competitiveness, and reduced turnover and recruitment costs. The Region obtains a strengthened local economy with a highly skilled workforce and better alignment of workforce capabilities with industry demands.

Provide training to upskill existing employees, particularly in high-demand and evolving industries like healthcare, manufacturing, logistics, and IT. Help local businesses remain competitive by improving the

skills of their workforce. Reduce turnover by offering career advancement opportunities to current employees. Strengthen the regional economy by investing in the workforce and addressing skills mismatches.

Up to 20% of WIOA Title I funds are allocated to support IWT in compliance with WIOA regulations. The WMWDB partners with state-level programs like Maryland Business Works to supplement local IWT efforts. Employers are required to contribute to the cost of training, with the percentage based on the size of the business:

- 10% for businesses with fewer than 50 employees.
- 25% for businesses with 51-100 employees.
- 50% for businesses with more than 100 employees.

To qualify for IWT funding, employers must operate in one of the local priority industries. Employees must also be currently employed, meet Fair Labor Standards Act (FLSA) requirements for employment, and need training to retain employment or advance to a higher position.

Training programs are customized to meet the specific needs of employers and employees. Training may include:

- Skill development for new technologies or processes.
- Leadership and management training.
- Certification or credentialing in high-demand areas.
- On-site or off-site instruction provided by training providers on the Maryland Eligible Training Provider List (ETPL).

Employers submit an application outlining their training needs, proposed training programs, and expected outcomes. The WMWDB evaluates applications based on:

- Alignment with priority industries.
- Potential impact on employee retention and advancement.
- Cost-effectiveness and employer contribution.

Employers are integral to program design and delivery, ensuring that training addresses real-world skills gaps. Collaboration with community colleges and technical schools ensures access to high-quality, industry-relevant training. Coordination with state initiatives like the Maryland Business Works program enhances funding and program reach.

By strategically investing in incumbent worker training, the WMWDB supports local businesses and workers while driving economic growth in Western Maryland.

J. DESCRIBE HOW YOUR BOARD WILL TRAIN AND EQUIP STAFF TO PROVIDE EXCELLENT, WIOA-COMPLIANT CUSTOMER SERVICE.

The Western Maryland Workforce Development Board (WMWDB) recognizes that well-trained and knowledgeable staff are critical to delivering exceptional customer service and meeting the Workforce Innovation and Opportunity Act (WIOA) standards. The Board implements comprehensive training programs, continuous professional development, and monitoring processes to ensure staff are equipped to provide customer-centric, WIOA-compliant services.

The Board's objective is to deliver seamless, high-quality customer service to jobseekers, businesses, and community partners, and promote continuous improvement in staff knowledge, skills, and capabilities. All new hires participate in an orientation that includes an overview of WIOA regulations, AJC operations, and local workforce priorities. Initial Training Modules include :

- Fundamentals of WIOA compliance and reporting.
- Use of the Maryland Workforce Exchange (MWE) for case management, reporting, and data entry.
- Customer service best practices and communication skills.

Western Maryland's workforce director is also a part of the Maryland Workforce Association. The Association offers a number of professional development opportunities for workforce professionals, including the Association's annual conference entitled Raising the Bar.

By investing in robust training and professional development, the WMWDB ensures staff are prepared to deliver excellent, compliant services that meet the needs of the Western Maryland community.

SECTION 4: TITLE I – ADULT, YOUTH, AND DISLOCATED WORKER FUNCTIONS

A. DESCRIBE THE DESCRIPTION AND ASSESSMENT OF THE TYPE AND AVAILABILITY OF ADULT AND DISLOCATED WORKER EMPLOYMENT AND TRAINING ACTIVITIES IN THE LOCAL AREA.

The Western Maryland Workforce Development Board (WMWDB) ensures a comprehensive range of employment and training activities for **Adult** and **Dislocated Worker** populations, tailored to the unique needs of the region's workforce. Services are designed to promote skill development, career advancement, and economic self-sufficiency in alignment with local labor market demands and WIOA requirements.

Career services are offered through the American Job Centers (AJCs) and include:

1. Basic Career Services:

- Job search assistance.
- Labor market information (LMI) on in-demand occupations.
- Resume writing and interview preparation workshops.
- Initial eligibility assessments for WIOA programs.

2. Individualized Career Services:

- Comprehensive skills assessments to identify training needs.
- Individual Employment Plans (IEPs) are tailored to participant goals.
- Career counseling and planning, including guidance on career pathways.
- Support for overcoming employment barriers, such as childcare and transportation.

3. Follow-Up Services:

- Post-employment support for up to 12 months to ensure job retention and career advancement.

The Western Maryland Workforce Development Board (WMWDB) ensures full compliance with federal and state policy governing the use of Individual Training Accounts (ITAs) under the Workforce Innovation and Opportunity Act (WIOA). Consistent with 20 CFR 680.410 through 680.490, ITA funds may only be used for training programs listed on the Maryland Eligible Training Provider List (ETPL). Local Workforce Development Boards are not authorized to deviate from the ETPL or approve non-listed programs when utilizing WIOA Title I Adult, Dislocated Worker, or Youth funding.

While WMWDB recognizes that the number of available training providers in certain occupational areas may be limited, the Board adheres strictly to ETPL requirements to ensure accountability, quality, and alignment with state oversight standards. When gaps in available training programs are identified, the WMWDB works collaboratively with the Maryland Department of Labor and local education providers to encourage qualified entities to apply for ETPL approval.

In accordance with TEGL 19-16 and TEGL 8-19, WMWDB acknowledges that limited exceptions exist where training may be provided outside the ETPL process, such as for On-the-Job Training (OJT), Customized Training, Incumbent Worker Training, or Programs of Demonstrated Effectiveness under WIOA § 134(c)(3)(G)(ii). Any such use will be coordinated with the Maryland Department of Labor and fully documented to ensure compliance with all applicable guidance and monitoring standards.

Through this approach, WMWDB maintains both flexibility and accountability, expanding access to high-quality training while ensuring that all WIOA-funded activities align with federal and state policies.

B. DESCRIBE HOW YOUR BOARD WILL COORDINATE WORKFORCE DEVELOPMENT ACTIVITIES IN THE LOCAL AREA WITH STATEWIDE RAPID RESPONSE ACTIVITIES. (SECTION 134(A)(2)(A)).

The Western Maryland Workforce Development Board (WMWDB) plays a critical role in coordinating local workforce development activities with statewide Rapid Response initiatives under WIOA Section 134(a)(2)(A). Rapid Response services are designed to provide timely and effective assistance to businesses and workers affected by layoffs, plant closures, and other employment disruptions, minimizing the economic impact on the community.

The WMWDB supports employers in managing workforce reductions while ensuring compliance with federal and state regulations (e.g., Worker Adjustment and Retraining Notification (WARN) Act). Staff provides dislocated workers with resources and services to transition into new employment or training opportunities quickly. Through maintaining partnerships with local employers, state agencies, and community organizations, the Board creates a seamless response to layoffs.

The WMWDB collaborates with the Maryland Department of Labor (MDOL) to monitor WARN notices and other early indicators of potential layoffs or closures. Local partnerships with chambers of commerce, economic development agencies, and industry associations provide additional insights into at-risk businesses.

The Board engages employers facing layoffs to offer assistance and provide information on Rapid Response services. Employers are educated about alternatives to layoffs, such as incumbent worker training, work-sharing programs, or business assistance. In collaboration with MDOL, the WMWDB organizes workshops for affected workers to provide:

- Career counseling and job search assistance.
- Information on unemployment insurance (UI) benefits.
- Access to retraining opportunities and supportive services.

Workshops may be conducted on-site at the employer's location, virtually, or at American Job Centers (AJCs). Affected workers are enrolled in WIOA Title I Dislocated Worker programs, offering access to:

- Individual Training Accounts (ITAs) for in-demand occupations.
- On-the-Job Training (OJT) and work-based learning opportunities.
- Supportive services, such as transportation and childcare.

The WMWDB works with employers to develop tailored solutions for workforce reductions, including connecting businesses with state and local resources for restructuring, and promoting work-sharing

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programs to retain employees part-time.

Job fairs and hiring events also connect affected workers with new employers. WMWDB staff maintain contact with employers after layoffs to assess their needs and provide ongoing support.

The WMWDB partners with MDOL on Rapid Response to ensure coordination of services and avoid duplication of efforts. Data and insights on layoffs are shared between the local and state levels to maintain a unified response. State resources, such as labor market information (LMI) and workforce trend data, are used to guide local planning and service delivery.

The WMWDB collaborates with local economic development agencies, chambers of commerce, and community organizations to identify at-risk businesses early and leverage local resources for affected workers and employers. Outreach efforts focus on educating businesses about available Rapid Response services and engaging affected workers through multiple channels, including social media, community events, and targeted communication.

By aligning with statewide Rapid Response activities and leveraging local resources, the WMWDB ensures that dislocated workers and employers receive timely, comprehensive assistance. This coordinated approach minimizes the impact of layoffs on workers and the community while fostering economic resilience in Western Maryland.

C. PROVIDE A DESCRIPTION AND ASSESSMENT OF THE TYPE AND AVAILABILITY OF YOUTH WORKFORCE DEVELOPMENT ACTIVITIES IN YOUR AREA, INCLUDING ACTIVITIES FOR YOUTH WHO ARE INDIVIDUALS WITH DISABILITIES. INCLUDE SUCCESSFUL MODELS OF SUCH YOUTH WORKFORCE DEVELOPMENT.

The Western Maryland Workforce Development Board (WMWDB) offers a variety of youth workforce development activities tailored to meet the needs of in-school and out-of-school youth, including those with disabilities. These programs are designed to prepare youth for careers and post-secondary education by addressing skill gaps, supporting career exploration, and removing barriers to employment.

The WMWDB delivers the 14 required WIOA Youth Program Elements through partnerships with Western Maryland's workforce partners. Out-of-school youth (OSY) have access to GED preparation and academic remediation provided in partnership with local education providers, such as Garrett College, Allegany College of Maryland, and Hagerstown Community College. These community college partners provide individualized assistance for youth struggling to complete high school or equivalent education.

Students can also access paid and unpaid work experiences, including summer youth employment programs, internships, and pre-apprenticeships through the WMWDB. In recovering from the pandemic, the WMWDB invested a portion of its American Rescue Plan Act (ARPA) funds in these work experiences for youth with a focus on skill development and exposure to real-world job settings.

Occupational Skills Training is provided in high-demand industries, such as healthcare, advanced manufacturing, and information technology. With access to Individual Training Accounts (ITAs) for eligible youth, WIOA youth funding allows students to pursue industry-recognized credentials.

Additionally, soft skills training and workshops that build self-confidence and workplace readiness allow the youth to obtain essential skills for the workplace. Supportive services such as transportation assistance, childcare, and access to mental health resources to address barriers to participation.

Customized support and accommodations in collaboration with the Division of Rehabilitation Services (DORS) allow qualifying youth with disabilities to have access to assistive technology, job coaching, and workplace accessibility assessments. Delivered by DORS, Pre-Employment Transition Services (Pre-ETS) offers career exploration, workplace readiness training, and self-advocacy skills for youth

with disabilities. Partnerships with employers to provide on-the-job training and internships with accommodations. AJCs are equipped with assistive technology to ensure that youth with disabilities can fully participate in career services and training.

Additionally, with the Blueprint for Maryland's Future, WMWDB, in coordination with the public school systems from each county and each county's community colleges, is providing career counseling for middle and high school students. This ensures that students become college and career-ready and further opens the "world of work" to our students.

Additionally, Western Maryland's workforce partners invest in summer youth opportunities. This program provides six to eight weeks of paid work experience for both in-school and out-of-school youth. It also includes workshops on employability skills, such as resume writing and interview techniques.

Collaboration with public schools to support at-risk youth, including dropout prevention and reengagement programs. Career counselors work directly with school intervention specialists to address barriers to graduation and career readiness.

The WMWDB provides robust, inclusive, and flexible youth workforce development activities that prepare youth for successful careers. By addressing identified challenges and leveraging best practices, the Board ensures continuous improvement and alignment with local workforce needs.

D. DESCRIBE HOW YOUR LOCAL AREA WILL COORDINATE EDUCATION AND WORKFORCE DEVELOPMENT ACTIVITIES CARRIED OUT IN YOUR AREA WITH RELEVANT SECONDARY AND POSTSECONDARY EDUCATION PROGRAMS AND ACTIVITIES TO COORDINATE STRATEGIES, ENHANCE SERVICES, AND AVOID DUPLICATION OF SERVICES.

The Western Maryland Workforce Development Board (WMWDB) ensures seamless coordination between education and workforce development activities to align strategies, enhance service delivery, and minimize duplication of services. This collaboration spans secondary and postsecondary education programs, fostering pathways for students and jobseekers to develop in-demand skills and transition into successful careers.

The WMWDB collaborates with local school districts and Career and Technical Education (CTE) programs to align curricula with labor market demands. Examples include programs in healthcare, manufacturing, IT, and skilled trades, preparing students for in-demand careers. Partnerships with high schools facilitate work-based learning, such as internships, job shadowing, and pre-apprenticeship programs. Students gain hands-on experience and industry exposure while earning academic credits.

This partnership only grows and expands under the Blueprint for Maryland's Future. Jointly organized career fairs, industry tours, and classroom presentations provide students with information on high-demand industries and career pathways.

The WMWDB also works closely with Garrett College, Allegany College of Maryland, and Hagerstown Community College to develop training programs that meet employer needs. These programs often lead to industry-recognized credentials and align with WIOA Individual Training Accounts (ITAs). Coordination with local colleges allows high school students to earn college credits in technical fields, reducing time and cost to complete degrees. Joint efforts between community colleges, employers, and workforce partners result in customized training programs and registered apprenticeships targeting regional skill gaps.

The Board partners with the area's community colleges as adult education providers to ensure that GED programs are aligned with workforce development strategies. Programs often incorporate career readiness components, such as resume writing and interview preparation.

Joint planning sessions and regular communication between the workforce and education partners ensure streamlined service delivery and avoid duplication. AJCs serve as a hub for connecting jobseekers with education programs, offering referrals and co-enrollment opportunities. Coordinated employer advisory boards provide input on curriculum development and workforce training needs. Employers participate in both education and workforce programs, such as offering internships to CTE students or hiring graduates of community college programs.

The local MOU between workforce and education partners defines each entity's roles and responsibilities to prevent overlapping services. AJCs focus on job placement, case management, and supportive services, while education partners concentrate on skill development and credential attainment. Workforce and education staff participate in cross-training sessions to understand each other's services, ensuring appropriate referrals and minimizing redundancy.

For example, the WMWDB collaborates with secondary and postsecondary education providers to develop career pathways in priority industries. Programs integrate academic coursework with work-based learning, leading to credentials recognized by employers. The Board also supports IET models combining GED or ESL instruction with occupational skills training, allowing participants to achieve both academic and career goals simultaneously. Dual enrollment partnerships have also led to successful transitions for high school students into postsecondary programs in fields like nursing, IT, and advanced manufacturing.

Through strategic coordination with secondary and postsecondary education programs, the WMWDB ensures that students and jobseekers receive cohesive, high-quality services that lead to meaningful employment. By aligning efforts, leveraging shared resources, and fostering strong partnerships, the Board enhances workforce development outcomes while avoiding duplication of services.

E. DESCRIBE HOW YOUR BOARD WILL COORDINATE WORKFORCE DEVELOPMENT ACTIVITIES CARRIED OUT UNDER THIS TITLE IN YOUR AREA, WITH THE PROVISION OF TRANSPORTATION, INCLUDING PUBLIC TRANSPORTATION, AND OTHER APPROPRIATE SUPPORTIVE SERVICES IN THE LOCAL AREA.

The Western Maryland Workforce Development Board (WMWDB) recognizes that access to transportation and other supportive services is critical to ensuring participation in workforce development programs. The Board actively collaborates with local partners to address barriers to employment and training, providing comprehensive support to jobseekers and businesses in the region.

The WMWDB collaborates with local transit agencies, such as Garrett Transit Service, Allegany County Transit, and Washington County Transit, to improve access to workforce services and employment opportunities. Jobseekers are provided with transit schedules, fare assistance, and route planning to access American Job Centers (AJCs), training facilities, and worksites. For participants without access to public transportation, the WMWDB offers vouchers or reimbursements for gas, ride-sharing services (where available), or other forms of travel. Partnerships with community organizations help subsidize these costs. The Board works with local employers to encourage shared transportation solutions, such as carpooling or shuttle services, particularly for hard-to-reach worksites.

Participants with dependents may receive financial assistance or referrals to childcare providers, ensuring they can attend training or work without interruptions. The Board collaborates with local child development agencies and the Maryland Child Care Resource Network to connect participants with licensed providers.

The WMWDB partners with local housing authorities and community action agencies to assist participants in securing stable housing, including access to emergency shelters or rental assistance programs. Financial support is also available for tools, uniforms, certifications, and other job-related expenses that participants may face during training or employment.

During the intake process, staff assess participants' supportive service needs, including transportation, childcare, and other barriers to participation. Individual Employment Plans (IEPs) include provisions for supportive services to ensure participants can meet their training and employment goals.

The WMWDB works closely with the Department of Social Services (DSS), community action agencies, and transportation providers to align resources and minimize duplication. Partnerships with local nonprofits such as HRDC in Allegany County and faith-based organizations extend the reach of supportive services, particularly in rural areas where resources are limited. The WMWDB aligns WIOA funds with other state and federal programs, such as Temporary Assistance for Needy Families (TANF) and Community Services Block Grants (CSBG), to maximize impact.

By integrating transportation and supportive services into workforce development activities, the WMWDB ensures that jobseekers can fully participate in training and employment opportunities. Through collaboration with partners, targeted funding, and continuous evaluation, the Board addresses barriers to employment, fostering a more inclusive and effective workforce system in Western Maryland.

F. DESCRIBE HOW YOUR BOARD WILL UTILIZE LOCAL ADULT FUNDING, BASED ON ADULT PRIORITY GROUPS AS SPECIFIED IN THE STATE PLAN.

The Western Maryland Workforce Development Board (WMWDB) strategically allocates **Local Adult Funding** to serve individuals who meet priority criteria as outlined in the Maryland State Plan and WIOA Section 134(c)(3)(E). These funds are used to provide career services, training opportunities, and supportive services to adults facing barriers to employment, ensuring access to workforce development resources.

The ultimate goal is for these populations to reach self-sufficiency. In compliance with WIOA and the State Plan, the LWDB will prioritize Local Adult Funding for:

- Veterans and Eligible Spouses - Priority access to all workforce programs, leveraging partnerships with veterans' organizations.
- Recipients of Public Assistance - Individuals receiving TANF, SNAP, or other means-tested public benefits.
- Other Low-Income Individuals - Individuals with household incomes below the federal poverty level or 70% of the lower living standard income level (LLSIL)
- Individuals Who Are Basic Skills Deficient - Those lacking proficiency in literacy or numeracy, as determined by assessments like the Test of Adult Basic Education (TABE).
- English Language Learners (ELLs) - Focused services for the county's diverse immigrant population, addressing language barriers to employment.
- Individuals with Disabilities - Collaboration with DORS to provide customized training, assistive technology, and supportive services.
- Returning Citizens - Reentry programs that include training and supportive services tailored to individuals with criminal records.
- Older Workers (Age 55+) - Digital literacy training and career transition programs for older job seekers.

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

To meet the needs of priority populations, Local Adult Funding is utilized to deliver a wide range of services. Job search workshops, one-on-one career counseling, and group sessions tailored to specific populations. Supportive services are documented in Objective Assessments and case notes within the Maryland Workforce Exchange. Labor Market Information provides access to local, regional, and national labor market data to help individuals make informed career decisions.

The WMWDB recognizes the importance of reaching underserved populations and expanding access to services. We collaborate with community-based organizations, faith-based groups, and local nonprofits to identify and engage individuals from priority populations. For those who cannot access the AJC, we maintain robust virtual service offerings, including workshops, counseling, and training opportunities, to accommodate job seekers who cannot access in-person services.

Occupational Skills Training is utilized to lead job seekers on a pathway to industry-recognized credentials in high-demand industries. The WMWDB also works with businesses to create Registered Apprenticeship opportunities, on-the-job training (OJT), and transitional job opportunities. The WMWDB also supports career advancement through ITA-funded training aligned with employer needs. Through the provision of supportive services such as transportation assistance, childcare support, and access to professional attire for interviews, job seekers are empowered to seek in-demand occupations.

To ensure alignment with employer needs, the WMWDB uses a business-driven model to develop career pathways. To that end, we collaborate with employers and training providers to create pathways that align with industry needs and lead to career advancement. We partner with businesses to identify skill gaps and co-design training programs that address these gaps while providing job seekers with opportunities for growth. Finally, we prioritize training in high-demand sectors identified in Section 1 of this Plan.

The WMWDB utilizes Local Adult Funding to address the unique needs of priority groups, ensuring they have access to career and training services that lead to sustainable employment. By aligning funding with state and federal priorities, the Board supports workforce development while driving economic growth in Western Maryland.

G. DESCRIBE HOW THE LOCAL BOARD WILL UTILIZE LOCAL DISLOCATED WORKER FUNDING.

The Western Maryland Workforce Development Board (WMWDB) strategically deploys Dislocated Worker Funds, which are the primary source for Local Dislocated Worker Funding to assist individuals who have been laid off, displaced by economic changes, or otherwise separated from their employment. These funds are used to provide career services, training, and supportive assistance that enable dislocated workers to reenter the workforce and achieve economic stability.

Dislocated Worker Funding is specifically directed toward individuals who meet the WIOA definition of a dislocated worker. This includes:

1. **Workers Laid Off or Terminated** - Individuals who have been laid off due to closures, downsizing, or economic shifts.
2. **Previously Self-Employed Individuals** - Those who have become unemployed due to economic conditions or natural disasters.
3. **Displaced Homemakers** - Individuals who have lost their primary source of income due to a significant change in family circumstances.
4. **Workers Impacted by Industry Decline** - Those affected by a decline in demand for skills within specific industries or occupations.

Dislocated workers receive funding for training programs in high-demand industries. ITAs prioritize programs leading to industry-recognized credentials or certifications. On-the-job training expenses may be reimbursed to employers who hire dislocated workers, covering a percentage of wages during the training period to incentivize hiring. Dislocated Worker Funding also supports the placement of dislocated workers in apprenticeship programs, combining classroom instruction with paid, hands-on experience.

Training and career services focus on high-demand industries identified through labor market analysis, ensuring alignment with employer needs. Local Dislocated Worker Funding is aligned with other funding sources, such as Rapid Response funds administered by the State and state workforce grants, to maximize impact. Collaboration with community organizations and state agencies ensures access to additional supportive services for participants.

The WMWDB effectively utilizes Local Dislocated Worker Funding to address the unique challenges faced by displaced workers. By aligning services with labor market demands, fostering strong employer partnerships, and providing comprehensive support, the Board ensures that dislocated workers can reenter the workforce and achieve long-term success.

H. DESCRIBE HOW YOUR BOARD WILL DEFINE “SELF-SUFFICIENCY” FOR EMPLOYED ADULT AND EMPLOYED DISLOCATED WORKER PARTICIPANTS.

The Western Maryland Workforce Development Board (WMWDB) defines “self-sufficiency” as a participant’s ability to earn a sustainable income that allows them to meet their basic needs without reliance on public assistance, while also providing opportunities for long-term economic stability. This definition varies for Adult and Dislocated Worker participants, taking into account family size, regional cost of living, and labor market conditions.

For Adult participants, self-sufficiency is defined as an income at or above 250% of the Health and Human Services Poverty Guidelines or the Lower Living Standard Income Level (whichever is higher), or the participant’s family size, adjusted for regional economic factors. The ability to cover essential expenses, including housing, food, healthcare, childcare, and transportation, without public assistance. Employment in a position offering career advancement opportunities, such as access to training, promotions, or benefits.

For Dislocated Workers, self-sufficiency is defined as an income equal to or greater than 80% of the wages earned at the worker’s previous employment, unless local economic conditions necessitate a different benchmark. Employment that matches or exceeds the participant’s skill level, ensuring the use of their prior experience and training. The potential for stable, long-term employment with wages sufficient to meet family and individual needs.

Adjustments are made based on the number of dependents and any unique financial obligations of the participant. The WMWDB uses data from local economic indicators, such as housing costs and transportation expenses in Garrett, Allegany, and Washington Counties, to establish realistic self-sufficiency thresholds. Wages in specific industries and occupations are considered to ensure participants are employed in roles that reflect local labor market conditions.

By establishing clear and regionally appropriate definitions of self-sufficiency, the WMWDB ensures that workforce programs support participants in achieving economic independence and long-term career growth. This approach aligns with local labor market realities and the broader goals of the Workforce Innovation and Opportunity Act (WIOA).

I. DESCRIBE YOUR BOARD’S DEFINITION OF “UNLIKELY TO RETURN TO PREVIOUS INDUSTRY OR OCCUPATION” WHEN REQUIRED FOR ELIGIBILITY FOR DISLOCATED WORKER SERVICES.

The Western Maryland Workforce Development Board (WMWDB) defines “**unlikely to return to previous industry or occupation**” as a condition in which a Dislocated Worker faces significant barriers or diminished opportunities to secure employment in their prior industry or occupation due to economic, personal, or market-based factors. This definition ensures alignment with the Workforce Innovation and Opportunity Act (WIOA) and local labor market conditions.

The determination is based on a comprehensive evaluation of individual circumstances and labor market data, including:

1. **Decline in Industry or Occupation Demand** - Labor market information (LMI) shows a sustained decline in demand for the participant’s previous industry or occupation in the local or regional area. Examples include automation, outsourcing, or shifts in consumer demand leading to layoffs or closures.
2. **Job Availability** - Few or no job openings exist locally in the individual’s prior field, despite active job searches.
3. **Wage Reduction** - Available jobs in the prior industry or occupation offer significantly lower wages, making them insufficient to meet the individual’s financial needs or local self-sufficiency standards.

4. **Skills Mismatch** - The individual's skills, certifications, or experience are no longer aligned with current industry requirements or technological advancements. Lack of access to affordable retraining options within the industry exacerbates this mismatch.
5. **Health or Physical Limitations** - Physical or medical conditions prevent the individual from performing required job functions in their previous occupation.
6. **Geographic Constraints** - Relocation or transportation limitations make it impractical for the individual to pursue jobs in their previous industry or occupation.

The WMWDB's definition of "unlikely to return to previous industry or occupation" balances objective labor market data with individual circumstances. This approach ensures that Dislocated Workers receive the tailored services and support necessary to transition into sustainable and meaningful new careers.

J. DESCRIBE HOW YOUR BOARD WILL INTERPRET AND DOCUMENT ELIGIBILITY CRITERIA FOR IN-SCHOOL YOUTH. (MARYLAND YOUTH POLICY AND WIOA SECTIONS 129(A)(1)(B)(III)(VII) AND (A)(1)(C)(IV)(VII))

The Western Maryland Workforce Development Board (WMWDB) ensures that **In-School Youth (ISY)** eligibility under WIOA Sections 129(a)(1)(B)(iii)(VII) and 129(a)(1)(C)(iv)(VII) is interpreted and documented accurately to meet federal, state, and local policy guidelines. This includes verifying all required eligibility criteria and maintaining thorough documentation to support program participation.

- Are youth in danger of not graduating from high school without having to take additional coursework and/or summer school, or,
- Are youth deemed at risk of dropping out of school by a school official, or,
- Are youth with court agency/referrals mandating school attendance, or,
- Are youth who do not have parental support to adult mentoring in the home, at school, and/or in their critical areas of the student's life.

By adhering to WIOA guidelines and Maryland Youth Policy, the WMWDB ensures accurate interpretation and documentation of ISY eligibility. This approach supports access to services and empowers youth to overcome barriers, achieve educational success, and build sustainable careers.

K. DESCRIBE HOW YOUR BOARD WILL INTERPRET AND DOCUMENT ELIGIBILITY CRITERIA FOR OUT-OF-SCHOOL YOUTH. (MARYLAND YOUTH POLICY AND WIOA SECTIONS 129(A)(1)(B)(III)(VII) AND (A)(1)(C)(IV)(VII).)

The Western Maryland Workforce Development Board (WMWDB) ensures accurate interpretation and documentation of eligibility criteria for **Out-of-School Youth (OSY)**, in accordance with WIOA Sections 129(a)(1)(B)(iii)(VII) and (a)(1)(C)(iv)(VII), and the Maryland Youth Policy. These criteria focus on reaching youth aged 16 to 24 who are disconnected from traditional education and employment systems, emphasizing access to services.

While federal law defines OSY as between 16 and 24, Maryland Compulsory Age law requires that students cannot be less than 18 years of age before dropping out of high school.

To qualify for OSY services, individuals must meet the following requirements:

- Are youth who do not have parental support or adult mentoring in the home and/or in other critical areas of the youth's life; or,
- Are youth with poor work history, to include no work history, or have been fired from a job within the last six months before application, or have never held a full-time job for more than 13

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consecutive weeks; or,

- Are youth with an incarcerated parent or guardian, or,
- Are youth facing significant cultural challenges within the family or community?
- Has the youth been referred to or treated by an agency for substance abuse / psychological problems?

The LWDB and its staff will document eligibility in the Maryland Workforce Exchange.

By adhering to WIOA and Maryland Youth Policy guidelines, the WMWDB ensures accurate interpretation and thorough documentation of OSY eligibility. This approach supports service delivery, helping disconnected youth overcome barriers and achieve meaningful career and educational outcomes.

L. DESCRIBE THE DOCUMENTATION THAT IS REQUIRED TO DEMONSTRATE A "NEED FOR TRAINING."

The Western Maryland Workforce Development Board (WMWDB) follows strict guidelines to document a participant's "need for training" in compliance with WIOA requirements. This documentation ensures that training services are aligned with participants' goals and address specific barriers to employment, while also meeting federal, state, and local policies.

To qualify for training services, a participant must meet the following conditions:

1. **Inability to Obtain or Retain Employment** - The participant is unemployed or underemployed and lacks the skills or qualifications required for in-demand occupations.
2. **Skill Gap or Lack of Credentials** - The participant requires additional training, education, or certification to meet industry requirements.
3. **Alignment with Career Goals** - Training is directly linked to the individual's career objectives and labor market demands.
4. **Ineligibility for Other Training Resources** - The participant cannot access sufficient funding from other sources to cover training costs.

Labor Market Information (LMI) may be used to demonstrate the need for training. This data may indicate that the participant's skills or credentials are not sufficient to meet employer demands in the local or regional job market.

By requiring comprehensive documentation, the WMWDB ensures that training services are provided only to participants with a demonstrated need. This approach supports efficient use of funds, alignment with labor market demands, and successful outcomes for job seekers.

M. DESCRIBE HOW YOUR BOARD WILL PROVIDE ACCESS TO THE 14 REQUIRED PROGRAM ELEMENTS FOR THE WIOA YOUTH PROGRAM DESIGN AND WHETHER THE LOCAL BOARD HAS CONTRACTED WITH YOUTH SERVICES PROVIDER.

The Western Maryland Workforce Development Board (WMWDB) ensures that all 14 required WIOA Youth Program elements are accessible to youth participants. These elements are delivered through a combination of direct services, partnerships with community organizations, and contracts with youth services providers. This approach is designed to address the diverse needs of both In-School Youth (ISY) and Out-of-School Youth (OSY), aligning with local workforce priorities and WIOA requirements.

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Program Element	Services	Providers
Tutoring, Study Skills Training, and Dropout Prevention	• Provide tutoring, academic enrichment, and study skills training. • Offer dropout prevention strategies through school-based partnerships.	Title II funded staff, training providers
Alternative Secondary School Services or Dropout Recovery	• Offer GED preparation, high school equivalency programs, and re-engagement initiatives.	Title II funded staff
Paid and Unpaid Work Experiences	• Provide internships, summer jobs, pre-apprenticeships, and on-the-job training (OJT).	Title I funded staff
Occupational Skills Training	• Offer training aligned with in-demand occupations, resulting in industry-recognized credentials.	Training providers
Leadership Development Opportunities	• Facilitate workshops on communication, teamwork, and decision-making. • Engage youth in community service and civic engagement projects.	Title I funded staff - AJC partners and community providers
Supportive Services	• Provide transportation, childcare, housing assistance, and other supports.	Core partners - Title I funds - Community partners
Mentoring	• Pair youth with adult mentors who provide guidance and career advice.	Volunteers, community partners, Title I funded staff
Follow-Up Services	• Offer 12 months of follow-up support, including check-ins, career counseling, and referrals.	Title I funded staff
Counseling	• Provide mental health counseling, substance abuse treatment referrals, and career guidance.	Title I funded staff - community partners
Concurrent Education and Workforce Preparation Activities	• Providing contextualized learning opportunities	Title I funded staff - community partners

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Financial Literacy Education	• Deliver workshops on budgeting, credit management, and financial planning.	Title I funded staff - community partners
Entrepreneurial Skills Training	• Offer training in business planning, marketing, and entrepreneurship.	Partner with SCORE, EDC, and self-employed business owners
Labor Market and Employment Information	• Provide youth with real-time labor market data and career exploration tools.	AJC partners - Title I funded staff - community partners
Preparing for Postsecondary Education and Training	• Offer college readiness workshops, FAFSA assistance, and campus tours.	Title I funded staff

The WMWDB may contract with qualified youth services providers to deliver many of the required program elements. Providers are selected through a competitive procurement process, ensuring alignment with WIOA guidelines and local workforce priorities. Youth services providers are responsible for delivering specific program elements, such as work-based learning opportunities, leadership development, and alternative education services. They work closely with WMWDB staff to ensure seamless integration of services and comprehensive support for participants.

The WMWDB provides certain program elements directly through American Job Centers (AJCs) and partnerships with community organizations. WMWDB staff play a key role in case management, supportive services coordination, and career counseling.

By leveraging contracts with youth services providers, direct service delivery, and strong community partnerships, the WMWDB ensures that all 14 required WIOA Youth Program elements are accessible and impactful. This approach helps youth in Western Maryland develop the skills, education, and experiences needed to achieve long-term success in the workforce.

N. DESCRIBE THE STEPS YOUR BOARD WILL TAKE TO ENSURE THAT AT LEAST 20% OF YOUTH FUNDS ARE USED FOR WORK-BASED TRAINING ACTIVITIES.

The Western Maryland Workforce Development Board (WMWDB) is committed to meeting the Workforce Innovation and Opportunity Act (WIOA) requirement that at least 20% of Youth Funds are allocated to work-based learning (WBL) activities. The Board implements strategic steps to ensure compliance, prioritize impactful experiences, and effectively engage youth in work-based training opportunities.

Work-based learning activities include the following eligible categories:

1. **Paid and Unpaid Work Experiences** - Internships, summer employment, and other short-term assignments designed to provide practical job exposure.
2. **On-the-Job Training (OJT)** - Agreements with employers to provide youth with structured, hands-on training while earning wages.
3. **Pre-Apprenticeships and Registered Apprenticeships** - Programs combining classroom instruction with practical, work-based experience in high-demand industries.

4. Job Shadowing - Short-term opportunities for youth to observe professionals in various careers.

5. Internships and Externships - Placements offering career-specific skill-building in a real-world environment.

The WMWDB's proactive planning, employer engagement, and strategic monitoring ensure that at least 20% of Youth Funds are allocated to work-based training activities. This focus equips youth with critical skills, provides valuable career exposure, and supports local workforce development goals.

O. DESCRIBE YOUR BOARD'S PLAN GOAL TO SERVE OUT-OF-SCHOOL YOUTH AND IDENTIFY SPECIFIC STEPS THAT HAVE BEEN TAKEN TO MEET THIS GOAL. IF YOUR BOARD'S GOAL IS UNDER 75 PERCENT, DESCRIBE HOW YOU WILL IMPLEMENT THE WAIVER AND HOW YOU WILL ENHANCE CONNECTIONS TO YOUTH APPRENTICESHIP PROGRAMMING, INCREASE DORS CO-ENROLLMENT, AND MAKE CHANGES FOR IN-SCHOOL-YOUTH (ISY) SERVICES.

The Western Maryland Workforce Development Board (WMWDB) prioritizes services for Out-of-School Youth (OSY) to meet or exceed the **75% WIOA funding requirement** for this population. The Board recognizes the critical importance of engaging OSY, who often face significant barriers to employment and education, and has developed targeted strategies to reach and serve this population effectively.

The WMWDB will ensure that at least **75% of WIOA Youth Funds** are dedicated to serving OSY, aligning with federal requirements unless a waiver is in place. Increase the number of OSY enrolled in workforce development programs, particularly those facing the greatest barriers, such as justice-involved youth, youth with disabilities, and those disconnected from education or employment.

Collaboration with alternative education programs, juvenile justice organizations, homeless shelters, and foster care agencies to identify and refer OSY. Social media campaigns, youth-targeted workshops, and outreach through community events to raise awareness of available services. Utilizing peer outreach strategies by engaging OSY participants who have successfully completed programs to share their experiences and encourage enrollment.

If a waiver is in place to serve less than 75% of the OSY, the WMWDB will take the following steps to enhance connections and balance service delivery:

1. Expanded Access to Apprenticeships:

- Increase youth participation in Registered Apprenticeships and pre-apprenticeships through partnerships with local employers and training providers with a focus on in-demand sectors.

2. Collaboration with Schools:

- Coordinate with local school districts to integrate apprenticeship opportunities into career and technical education (CTE) programs.

3. Partnership with DORS:

- Strengthen collaboration with the Division of Rehabilitation Services (DORS) to co-enroll youth with disabilities in WIOA programs.

4. Joint Service Plans:

- Develop individualized service strategies that align DORS resources (e.g., assistive technology, job coaching) with WIOA-funded training and work-based learning opportunities.

The WMWDB is committed to meeting or exceeding the 75% funding requirement for OSY, ensuring that disconnected youth have access to robust education, training, and employment services. If a waiver is in place, the Board will enhance connections to apprenticeships, increase DORS co-enrollment, and strategically adjust ISY services to maintain compliance while achieving impactful outcomes. These efforts align with the Board's mission to empower all youth in Western Maryland to succeed in their education and career goals.

P. DESCRIBE HOW YOUR BOARD WILL PROVIDE BASIC AND INDIVIDUALIZED CAREER SERVICES TO CUSTOMERS AND HOW SERVICES WILL BE COORDINATED ACROSS PROGRAMS/PARTNERS IN THE AJCS.

The Western Maryland Workforce Development Board (WMWDB) ensures the delivery of high-quality basic and individualized career services through a coordinated, customer-centered approach in its American Job Centers (AJCs). Services are designed to meet the diverse needs of jobseekers while leveraging the expertise and resources of partner programs to provide seamless, integrated support.

Basic career services are universally accessible and designed to assist jobseekers in exploring career options, navigating the labor market, and taking initial steps toward employment. These include:

1. **Eligibility Determination** - Initial assessments to determine eligibility for WIOA and partner programs.
2. **Labor Market Information (LMI)** - Access to up-to-date information on in-demand occupations, wages, and required skills.
3. **Job Search Assistance** - Support with resume writing, interview preparation, and job applications.
4. **Workshops and Hiring Events** - Regularly scheduled workshops on job readiness topics and employer-hosted hiring events.
5. **Access to Tools and Technology** - Use of computers, internet, and job boards at AJCs for job search and application submissions.
6. **Referrals to Partner Programs** - Direct referrals to training programs, supportive services, and community resources.

Individualized career services provide more intensive support to jobseekers who require additional assistance to overcome barriers to employment. These include:

1. **Comprehensive Assessments** - In-depth evaluations of skills, interests, work history, and barriers to employment.

2. **Individual Employment Plans (IEPs)** - Customized plans outlining career goals, training needs, and steps to achieve employment.
3. **Career Counseling** - One-on-one guidance to help participants identify career pathways and make informed decisions.
4. **Skill Development** - Access to workshops, certifications, and skills training that align with labor market demands.
5. **Case Management** - Ongoing support and coordination of services to help participants stay on track with their plans.
6. **Supportive Services** - Coordination of transportation, childcare, and other supports to address barriers.

Through effective coordination with partners and a commitment to customer-centered service delivery, the WMWDB ensures that both basic and individualized career services meet the needs of Western Maryland's jobseekers. This integrated approach supports access, enhances service quality, and drives positive employment outcomes.

Q. DESCRIBE THE LOCAL BOARD'S FOLLOW-UP SERVICES POLICY. THIS SHOULD INCLUDE FOLLOW-UP REQUIREMENTS, FREQUENCY OF CONTACT, AND REQUIRED DOCUMENTATION.

The Western Maryland Workforce Development Board (WMWDB) ensures that follow-up services are mandatory for all participants of WIOA programs in accordance with federal regulations, local policies, and best practices. These services are designed to support job retention, career advancement, and sustained success in employment or education.

Follow-up services help participants transition successfully into the workforce or postsecondary education. They provide ongoing support to address challenges that may arise after program exit, ensuring participants achieve long-term self-sufficiency and career stability.

Follow-up services are mandatory for all participants for a minimum of **12 months** after program exit, as required by WIOA. Follow-up services are offered to participants who have entered unsubsidized employment but may need additional support to retain or advance in their careers.

Follow-up contact is typically conducted **quarterly** for up to 12 months after exit. More frequent contact may be provided for participants who request additional support. Detailed case notes are entered into the Maryland Workforce Exchange (MWE) system, recording:

- Type of contact (e.g., phone, email, in-person).
- Date of contact.
- Services provided or discussed.

- Participant outcomes or progress updates.

Participant information is documented and stored securely, ensuring compliance with confidentiality and data protection standards.

The WMWDB's follow-up services policy ensures comprehensive support for youth, adults, and dislocated workers during the critical transition period after program exit. By providing consistent, documented, and tailored follow-up, the Board promotes long-term employment success and career growth for participants in Western Maryland.

SECTION 5: TITLE II – ADULT EDUCATION AND FAMILY LITERACY FUNCTIONS

A. DESCRIBE HOW YOUR BOARD WILL COORDINATE WORKFORCE DEVELOPMENT ACTIVITIES IN YOUR AREA, INTEGRATING THE PROVISION OF ADULT EDUCATION AND LITERACY ACTIVITIES UNDER TITLE II OF WIOA, INCLUDING, BUT NOT LIMITED TO, THE IMPLEMENTATION OF THE CAREER PATHWAYS MODEL.

The Western Maryland Workforce Development Board (WMWDB) integrates adult education and literacy activities under Title II of WIOA with workforce development activities to create seamless pathways for individuals to achieve educational and career goals. This approach is centered on the career pathways model, ensuring alignment between education, training, and employment opportunities.

The WMWDB partners with adult education providers, including:

- **Garrett College** – 687 Mosser Road, McHenry, MD 21541
- **Allegany College of Maryland** – 12401 Willowbrook Road, SE, Cumberland, MD 21502
- **Hagerstown Community College** – 11400 Robinwood Drive, Hagerstown, MD 21740

These providers deliver high-quality adult education programs, such as GED preparation, English as a Second Language (ESL) instruction, Family Literacy, and basic skills development (reading, writing, and math). Eligible participants are co-enrolled in Title II adult education programs and WIOA-funded workforce activities. Co-enrollment ensures participants can simultaneously improve their educational skills and access workforce services, such as career counseling, training, and supportive services.

Adult education and workforce development staff collaborate to provide: joint workshops on employability skills, digital literacy, and career readiness; and Integrated Education and Training (IET) programs that combine basic education with occupational training.

Career pathways are developed based on labor market information (LMI) to address skills gaps in high-demand industries, such as healthcare, IT, advanced manufacturing, transportation, logistics, and various skilled trades. Pathways allow participants to earn industry-recognized credentials incrementally, enabling them to progress in their careers while pursuing further education.

Integration of Education and Training curricula is aligned with occupational training, helping participants learn foundational skills in the context of their chosen career fields. Participants engage in internships, apprenticeships, and on-the-job training while completing educational requirements.

MOUs between the WMWDB and Title II providers define roles, responsibilities, and resource sharing. MOUs ensure alignment of goals, curricula, and performance metrics. WMWDB utilizes the Maryland Department of Labor and various secure partner systems such as Maryland Workforce Exchange and LACES to track participant progress, share case notes, and document outcomes. Regular cross-training ensures workforce and adult education staff understand each other's services, enabling informed referrals and joint service planning.

Through strong partnerships with Title II providers, the WMWDB integrates adult education and workforce development activities to empower participants with the skills, credentials, and support needed for career success. The career pathways model serves as the foundation for creating seamless, efficient, and impactful transitions from education to employment.

B. DESCRIBE HOW YOUR BOARD WILL COORDINATE EFFORTS WITH TITLE II PROVIDERS TO ALIGN BASIC SKILLS AND ENGLISH LANGUAGE ASSESSMENTS, AND INCLUDE THE FOLLOWING:

- **AN OUTLINE OF THE STEPS TO ALIGN BASIC EDUCATION SKILLS AND ENGLISH LANGUAGE ASSESSMENTS WITHIN YOUR AREA, INCLUDING, BUT NOT LIMITED TO, ANY MOU ENTERED INTO BY THE WORKFORCE DEVELOPMENT AND ADULT LEARNING PARTNERS;**
 - **HOW ASSESSMENT SCORES WILL BE SHARED AMONG WIOA TITLE I AREAS AND TITLE II PROVIDERS (CONSIDERATION MUST BE GIVEN TO THE FEDERAL EDUCATION RIGHTS AND PRIVACY ACT (FERPA));**
 - **WHO WILL CONDUCT WHICH OF THE APPROVED ASSESSMENTS (INCLUDING FOR TRADE PARTICIPANTS) AND WHEN WILL SUCH ASSESSMENTS BE CONDUCTED, CONSISTENT WITH THIS POLICY?**
 - **HOW WILL YOUR AREA COORDINATE TESTING BETWEEN WORKFORCE DEVELOPMENT AND ADULT EDUCATION PROVIDERS, AND**
 - **HOW WILL YOUR AREA ENSURE THAT TEST ADMINISTRATORS ARE TRAINED? (SEE MD LABOR'S POLICY AND APPLICABLE TESTING GUIDELINES) (DWDAL'S POLICY ON ASSESSMENTS)**
- *ALL BULLET POINTS MUST BE ADDRESSED**

The Western Maryland Workforce Development Board (WMWDB) is committed to aligning basic skills and English language assessments between WIOA Title I and Title II providers. This coordination ensures efficient service delivery, eliminates duplication, and provides consistent support for participants. The following outlines the WMWDB's approach to achieving alignment, addressing each specified point.

The WMWDB has entered into the local Memorandum of Understanding (MOU) with Title II providers (e.g., Garrett College, Allegany College of Maryland, and Hagerstown Community College). MOUs define roles, responsibilities, and data-sharing protocols to facilitate alignment of assessment activities. Regular meetings between WIOA Title I case managers and Title II adult education staff ensure consistent communication and coordination. Title I and Title II partners agree on the use of (and can administer) Maryland-approved NRS assessments, such as the TABE (Test of Adult Basic Education) and CASAS (Comprehensive Adult Student Assessment System), to evaluate basic skills and English language proficiency.

Data-sharing agreements ensure adherence to the Federal Education Rights and Privacy Act (FERPA) and the Maryland Department of Labor's confidentiality requirements. Participant consent forms are required to share assessment scores between Title I and Title II providers. Assessment results are shared with authorized providers to avoid redundant testing and streamline service delivery.

As the educational core partner under WIOA, Title II staff administer NRS-approved assessments for all participants in collaboration with Title I as part of intake. TAA participants are assessed using the same tools as WIOA participants to ensure consistency.

Initial assessments are conducted during the intake process to establish baseline skills and eligibility for WIOA services. Follow-up assessments are conducted at regular intervals to measure progress and determine readiness for training or employment.

WIOA Title I staff refer participants to Title II providers for additional assessment and enrollment in adult education programs when needed. Workforce development and adult education providers coordinate testing schedules to minimize participant inconvenience and avoid duplication. Testing services are offered at each Title II provider location, American Job Centers (AJCs), and various partner sites, ensuring accessibility for participants. Title I and Title II staff collaborate to review assessment results and develop Individualized Employment Plans (IEPs) or Individualized Education Plans (IEPs).

All test administrators are required to adhere to the Maryland Department of Labor Basic Education and English Language Assessment Policy and must complete training provided by Maryland's Department of Labor and the specific testing provider (e.g., TABE or CASAS certification programs). Test administrators participate in periodic refresher training to stay current with state policies and testing guidelines.

The WMWDB's coordinated approach ensures alignment of basic skills and English language assessments, reduces duplication, and enhances service delivery for participants. By leveraging strong partnerships, centralized systems, and rigorous training, the Board ensures compliance with the National Reporting System (NRS) and state policy regarding appropriate assessment and supports participant educational and career advancement.

C. DESCRIBE HOW YOUR BOARD WILL ENSURE THAT THE INDIVIDUAL APPOINTED TO REPRESENT TITLE II SERVICES ON THE BOARD WILL COORDINATE WITH ALL TITLE II GRANT ADMINISTRATORS IN THE LOCAL AREA IN A UNIFORM, REGULAR, AND CONSISTENT MANNER.

The Western Maryland Workforce Development Board (WMWDB) is committed to fostering strong collaboration between the Title II representative on the Board and all Title II grant administrators in the region. This ensures alignment of adult education services with local workforce development goals and seamless coordination of efforts across the Local Area. The appointed representative rotates each year between the institutions.

The individual appointed to represent Title II services on the WMWDB is tasked with:

- **Advocacy** – Ensuring Title II priorities are incorporated into workforce board decision-making.
- **Coordination** – Facilitating collaboration among Title II grant administrators across the region.
- **Board Participation** – Serving as a voting member on the workforce board.
- **Data Reporting** – Consolidating Title II progress reports for board presentations.
- **Stakeholder Engagement** – Participating in workforce planning sessions to align adult education services with broader workforce strategies.

The Title II representative provides updates at Board meetings on the status of Title II activities and collaboration efforts. Title II grant administrators submit progress reports to the Title II representative, who compiles and presents a consolidated overview to the Board. Title II grant administrators

participate in workforce planning sessions, ensuring adult education objectives are integrated into broader workforce development strategies.

By establishing clear communication channels, fostering regular interaction, and ensuring alignment of goals, the WMWDB guarantees that the Title II representative effectively coordinates with all Title II grant administrators. This collaborative approach enhances service delivery, promotes consistency, and supports the shared mission of empowering individuals through education and workforce opportunities.

D. DESCRIBE HOW ADULT EDUCATION SERVICES WILL BE PROVIDED IN THE AJC SYSTEM WITHIN THE LOCAL AREA.

The Western Maryland Workforce Development Board (WMWDB) ensures that adult education services are seamlessly integrated into the WIOA Workforce system to address the educational and workforce needs of local job seekers. This integration supports a holistic approach to career readiness and aligns with WIOA Title II requirements.

Adult education providers (Garrett College, Allegany College of Maryland, and Hagerstown Community College) coordinate with WIOA partners to deliver basic education, GED preparation, Family Literacy, English as a Second Language (ESL), and Workplace Literacy classes at AJC locations and on their community college campuses. Regularly scheduled workshops focus on essential skills such as digital literacy, financial literacy, workplace readiness, and workplace literacy. Adult education services are aligned with career pathways programs, combining basic education with occupational skills training to accelerate workforce readiness. Adult education services are integrated with career pathways programs, combining foundational education with occupational skills training to enhance workforce readiness. Courses incorporate industry-specific terminology and concepts, equipping participants with the knowledge and skills needed to succeed in Western Maryland's key growth sectors.

Participants co-enrolled in WIOA Title I and Title II programs have integrated service plans, ensuring alignment of educational and career goals. Workforce and adult education staff meet as needed to discuss participant progress, share updates, and refine service delivery. AJC staff refer participants to adult education programs for skill-building, and Title II providers refer participants to WIOA Title I programs for career counseling and training. The Maryland Workforce Exchange (MWE) is used to track participants' progress across both systems, ensuring cohesive service delivery.

The WMWDB's integrated approach ensures that adult education services within the AJC system effectively address the basic skills and workforce readiness needs of participants. By embedding services, fostering collaboration, and leveraging technology, the Board supports individuals in achieving their educational and career goals.

E. DESCRIBE HOW ADULT EDUCATION PROVIDERS IN YOUR AREA WILL USE THE INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION (IELCE) PROGRAM TO PREPARE ADULTS WHO ARE ENGLISH LANGUAGE LEARNERS FOR, AND PLACE SUCH ADULTS IN, UNSUBSIDIZED EMPLOYMENT IN IN-DEMAND INDUSTRIES AND OCCUPATIONS THAT LEAD TO ECONOMIC SELF-SUFFICIENCY. IF THERE ARE NO IELCE PROVIDERS IN YOUR AREA, THE RESPONSE SHOULD NOTE HOW THE AREA REFERS TO JOB SEEKERS LOOKING FOR IELCE SERVICES. (SEE WIOA SECTION 243(A))

In Western Maryland, Washington County is the only community wherein local adult education providers implement Integrated English Literacy and Civics Education (IELCE) programs, as outlined in WIOA Section 243(a). These programs are designed to equip adults who are English language learners (ELLs) with the language, civic, and workforce skills necessary for unsubsidized employment in in-demand industries, fostering economic self-sufficiency.

If IELCE providers are not present in the area, the WMWDB ensures job seekers are referred to appropriate resources in neighboring regions or statewide programs.

IELCE programs aim to develop English language proficiency and literacy skills, teach civics education, and integrate language instruction with workforce preparation and training for in-demand occupations.

Courses focus on improving ELL participants' abilities in reading, writing, speaking, and listening, aligned with the College and Career Readiness Standards for Adult Education. Curriculum incorporates job-specific vocabulary and language skills, tailored to local labor market needs. Participants learn about:

- U.S. government systems, laws, and history.
- Workforce rights and responsibilities.
- Community engagement and navigation skills.

Training includes digital literacy and workplace technology; resume writing, interview preparation, and soft skills; and understanding workplace norms and communication. IELCE programs include an IET component, combining language and literacy instruction with occupational skills training. Participants earn industry-recognized credentials in sectors such as healthcare, hospitality, IT, and manufacturing.

If IELCE services are not available in the Local Area, participants are referred to IELCE providers in neighboring regions or statewide programs. The WMWDB connects participants with online IELCE programs offered by Maryland-approved providers. Collaborations with libraries, community organizations, and immigrant resource centers ensure participants receive language and civics education support.

Through IELCE programs, the WMWDB ensures that English language learners gain the skills and knowledge necessary to secure unsubsidized employment in in-demand industries. By integrating language instruction with workforce preparation and leveraging community and employer partnerships, these programs foster economic self-sufficiency and career growth for participants. In the absence of local IELCE providers, the WMWDB facilitates referrals to ensure seamless access to these critical services.

SECTION 6: TITLE III – WAGNER-PEYSER FUNCTIONS

A. DESCRIBE YOUR PLANS AND STRATEGIES FOR MAXIMIZING THE COORDINATION OF SERVICES PROVIDED BY THE STATE EMPLOYMENT SERVICE UNDER THE WAGNER-PEYSER ACT (29 U.S.C. 49 ET SEQ.) AND SERVICES PROVIDED IN YOUR AREA THROUGH THE AJC DELIVERY SYSTEM TO IMPROVE SERVICE DELIVERY AND AVOID DUPLICATION OF SERVICES.

The Western Maryland Workforce Development Board (WMWDB) is committed to ensuring that services provided under the Wagner-Peyser Act are seamlessly integrated into the American Job Center (AJC) delivery system. This integration improves service delivery, avoids duplication, and ensures that jobseekers and employers receive comprehensive support.

Wagner-Peyser staff work collaboratively with WIOA Title I staff to provide a unified experience for customers. Jobseekers receive a single point of entry for services, eliminating the need to navigate multiple systems. Wagner-Peyser staff are co-located at AJCs in Garrett, Allegany, and Washington Counties, providing immediate access to services such as:

- Job search assistance.
- Labor market information (LMI).
- Reemployment workshops.

Wagner-Peyser staff provide jobseekers with assistance in resume preparation and interview techniques and job applications and referrals to available positions. AJC staff enhance these services by offering individualized career counseling and training opportunities.

Roles and responsibilities are defined through the local Memorandum of Understanding (MOU) and Resource Sharing Agreement (RSA), ensuring clarity between Wagner-Peyser and AJC staff.

Regular joint planning sessions align service delivery strategies, ensuring that Wagner-Peyser and AJC staff complement rather than duplicate efforts. The Maryland Workforce Exchange (MWE) serves as a centralized platform for tracking customer interactions, reducing redundancy, and ensuring that both Wagner-Peyser and AJC staff have real-time access to service histories and outcomes.

In accordance with 20 CFR Section 652.207, Wagner-Peyser staff must provide labor exchange services that are available to all employers and job seekers, including Unemployment Insurance claimants, veterans, migrant and seasonal farmworkers, and individuals with disabilities. In accordance with federal law, Wagner-Peyser staff must deliver labor exchange services to job seekers as described in the Wagner-Peyser Act, through: (i) self-serve, through virtual services; (ii) facilitated self-help service; and (iii) staff-assisted service.

Per the Final Rule issued by the United States Department of Labor on November 24, 2023, only state merit staff and applicable Wagner-Peyser contractual staff can deliver Wagner-Peyser services in Western Maryland.

By maximizing coordination between Wagner-Peyser services and the AJC delivery system, the WMWDB ensures efficient, high-quality support for jobseekers and employers. Through unified service delivery, shared tools, and continuous improvement efforts, this approach eliminates duplication and enhances the overall effectiveness of workforce services in Western Maryland.

B. DESCRIBE HOW YOUR BOARD WILL COORDINATE WITH THE WAGNER-PEYSER PROGRAM TO PROVIDE MIGRANT AND SEASONAL FARM WORKERS IN ITS LOCAL AREA WITH EMPLOYMENT SERVICES.

The Western Maryland Workforce Development Board (WMWDB) collaborates closely with the Wagner-Peyser program to ensure that Migrant and Seasonal Farm Workers (MSFWs) in the Local Area receive comprehensive access to employment services. These services are tailored to address the unique needs of MSFWs and align with the WIOA mandate to serve underserved populations.

Wagner-Peyser program staff, including MSFW outreach specialists, conduct outreach activities at agricultural worksites, community centers, and housing locations to inform MSFWs about available services. Partnerships with local organizations, such as advocacy groups and nonprofits, help identify and connect with MSFW populations.

MSFWs receive assistance with job search, referrals to job opportunities, and placement in agricultural and non-agricultural employment. Services include guidance on career pathways, especially in industries offering stable, higher-wage employment opportunities.

Wagner-Peyser staff and interpreters provide services in Spanish and other languages commonly spoken by MSFWs. Job postings, labor market information, and informational brochures are available in multiple languages. Staff receive training to understand the cultural and social contexts of MSFWs, ensuring respectful and effective communication. MSFWs are educated about their rights in the workplace, including wage laws, safety standards, and how to file complaints with the State Monitor Advocate if necessary.

By coordinating closely with Wagner-Peyser staff and leveraging local partnerships, the WMWDB ensures that MSFWs in Western Maryland receive access to employment services and career advancement opportunities. This comprehensive approach addresses their unique needs, promotes economic self-sufficiency, and enhances their contributions to the local workforce.

C. EXPLAIN WHO IS RESPONSIBLE FOR CONDUCTING MIGRANT AND SEASONAL FARMWORKER HOUSING INSPECTIONS.

Pre-occupancy housing inspections are provided by Wagner-Peyser staff for MSFW with interstate job orders active or by Rural Agricultural staff if H2A workers are involved.

SECTION 7: TITLE IV – VOCATIONAL REHABILITATION FUNCTIONS

A. DESCRIBE THE COOPERATIVE AGREEMENTS THAT HAVE BEEN REPLICATED BETWEEN YOUR BOARD OR OTHER LOCAL ENTITIES AND THE LOCAL OFFICE OF A DESIGNATED STATE AGENCY OR UNIT ADMINISTERING PROGRAMS UNDER TITLE I OF THE ACT. EXPLAIN YOUR EFFORTS TO IMPROVE SERVICES, WHICH MAY INCLUDE CROSS-TRAINING OF STAFF, TECHNICAL ASSISTANCE, INFORMATION SHARING, COOPERATIVE WORK WITH EMPLOYERS, AND OTHER COLLABORATIVE AND COORDINATED INITIATIVES. (REHABILITATION ACT, 29 U.S.C. 721(A)(11)(B), 29 U.S.C. 720 ET SEQ., 29 U.S.C. 732, 741).

The Western Maryland Workforce Development Board (WMWDB) has established cooperative agreements with local offices of designated state agencies, particularly the Maryland State Division of Rehabilitation Services (DORS), which administers programs under the Rehabilitation Act. These agreements are designed to enhance the coordination and delivery of workforce services, ensure accessibility for individuals with disabilities, and align with the requirements of Title I of the Rehabilitation Act and WIOA.

The local MOU outlines roles, responsibilities, and shared resources between the WMWDB and DORS. Agreements cover joint service delivery, referral protocols, and the use of shared facilities at American Job Centers (AJCs). The RSA specifies how costs for shared services, such as assistive technology and staff support, are allocated between agencies.

Under the MOU, DORS, in accordance with 29 USC Section 721(a)(11), will provide the following services:

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

- Provide **Supported Employment Services for youth and adults** with disabilities as defined by WIOA;
- Provide **independent living services** to enhance the capacity of persons with disabilities to live unaided in the community;
- Provide **performance information** as required by WIOA.
- Provide **cross-training** of workforce staff on disability related issues;
- Provide **technical assistance** on disability related issues and on assistive technology;
- **Engage employers** through the Division's Business Services Representatives; and,
- Work in a collaborative manner to **coordinate services** among the workforce partners for youth and adults with disabilities.

Through cooperative agreements and collaborative initiatives with DORS and other partners, the WMWDB ensures that individuals with disabilities receive coordinated, high-quality workforce services. These efforts enhance accessibility, maximize resources, and promote inclusive workforce development in Western Maryland.

B. DESCRIBE HOW INDIVIDUALS WITH DISABILITIES WILL BE SERVED THROUGH THE AJC SYSTEM IN THE LOCAL AREA.

The Western Maryland Workforce Development Board (WMWDB) is committed to ensuring that individuals with disabilities have access to all services provided through the American Job Center (AJC) system. Services are designed to meet the unique needs of this population while promoting inclusion, independence, and long-term employment success.

All AJCs in the Local Area are compliant with the Americans with Disabilities Act (ADA), ensuring access to facilities, including parking, entrances, restrooms, and workstations. AJCs are equipped with tools such as screen readers, speech-to-text software, magnifiers, and TTY devices for individuals with sensory impairments. All workforce programs and services are designed to be accessible to individuals with disabilities, including job search assistance, career counseling, and training opportunities. Websites, online applications, and virtual services are designed to meet Web Content Accessibility Guidelines (WCAG), ensuring usability for individuals with visual, hearing, or cognitive disabilities.

Customized plans outline participants' career goals, skill-building needs, and support requirements. AJCs provide in-depth assessments to identify skills, interests, and barriers, enabling tailored service delivery. Programs combine basic skills education with occupational training in high-demand industries. Opportunities such as internships, apprenticeships, and on-the-job training (OJT) are designed to provide hands-on experience while addressing specific accommodation needs.

Eligible participants are co-enrolled in WIOA Title I programs and DORS services to maximize resources and support. DORS provides specialized support, such as job coaching, to help individuals

with disabilities secure and retain employment. AJCs collaborate with employers to promote the hiring of individuals with disabilities and provide education on workplace accommodations. Employers are informed about tax credits (e.g., Work Opportunity Tax Credit) and resources for hiring individuals with disabilities.

Through inclusive service delivery, strong partnerships, and ongoing staff training, the WMWDB ensures that individuals with disabilities can fully access and benefit from AJC services. This approach empowers participants to overcome barriers, achieve self-sufficiency, and thrive in the workforce.

SECTION 8: TEMPORARY ASSISTANCE FOR NEEDY FAMILIES FUNCTIONS

(A) DESCRIBE HOW TANF IS INTEGRATED IN THE AJC SYSTEM (E.G., CUSTOMER INTAKE, SERVICE COORDINATION, CLIENT MONITORING AND TRACKING, TARGETING EMPLOYMENT SERVICES TO LOW-SKILL, LOW-WAGE WORKERS, ETC.).

Western Maryland is committed to ensuring that Temporary Assistance for Needy Families (TANF)¹ recipients develop the skills needed to achieve self-sufficiency and move toward middle- and high-skill employment. The Department of Social Services (DSS) across Garrett, Allegany, and Washington counties plays a critical role in integrating TANF customers into the workforce system by co-locating services within the American Job Centers (AJCs) and leveraging partnerships for seamless service delivery.

TANF recipients are introduced to workforce services through DSS caseworkers, who determine eligibility for TANF and other social service programs. A “no wrong door” policy allows TANF customers to access services through either the DSS offices or the AJCs, ensuring smooth intake and coordination.

TANF recipients have full access to AJC resources, including career services, job search assistance, and training programs. Caseworkers from Title I and TANF programs share client progress to ensure continuity of services. DSS and workforce partners coordinate work-based learning opportunities, such as:

- On-the-Job Training (OJT)
- Incumbent Worker Training
- Work Experience & Internships
- Youth Programs for TANF-eligible young adults

Regular communication between Title I and TANF caseworkers ensures that participants are progressing toward employment goals. AJCs use the Maryland Workforce Exchange (MWE) to document and track TANF participants' job search and training activities. Joint case management meetings identify opportunities for further collaboration, including:

- Staff training on data sharing and confidentiality
- Improved referral processes
- Common intake procedures for cross-program coordination

¹ In Maryland, TANF is referred to as Temporary Cash Assistance (TCA). For clarity, we will still refer to this program as TANF in this plan.

Career Pathway Models are available to help TANF recipients build foundational skills and transition into sustainable employment. TANF recipients can participate in Title I-funded Individual Training Accounts (ITAs) to obtain industry-recognized credentials.

Job search workshops, interview preparation, and soft skills training (e.g., workplace etiquette, financial literacy) are provided to help participants succeed in the workforce.

Western Maryland aims to reduce barriers to employment by coordinating supportive services, such as:

- Transportation assistance
- Childcare support
- Housing referrals
- Mental health services

Through ongoing collaboration, Western Maryland's DSS, AJCs, and workforce development partners work together to provide TANF recipients with the necessary tools and support to achieve long-term economic independence.

(B) DESCRIBE YOUR IMPLEMENTATION AND COORDINATION PROCESS TO ENHANCE THE PROVISION OF SERVICES TO INDIVIDUALS ON TANF THAT INCLUDES:

- **POTENTIAL CO-LOCATION OF LDSS AND/OR WIOA PARTNERS AT AJCS OR LDSS, DEPENDING ON THE NATURE OF LOCAL PARTNERSHIPS AND OPERATIONS;**
 - **LEVERAGING EXISTING FINANCIAL AND IN-KIND CONTRIBUTIONS TO THE WIOA SYSTEM TO ENSURE COORDINATION OF SERVICES PROVIDED BY MULTIPLE PROGRAMS, CREATING A SEAMLESS APPROACH TO DELIVERING SERVICES;**
 - **CROSS-TRAINING AND PROVIDING TECHNICAL ASSISTANCE TO ALL WIOA PARTNERS ABOUT TANF;**
 - **ENSURING THAT ACTIVITIES ARE COUNTABLE AND TRACKED FOR THE TANF WORK PARTICIPATION RATE;**
 - **ACCESS TO BUSINESS SERVICES AND EMPLOYER INITIATIVES TO ATTRACT AND BETTER SERVE EMPLOYERS BY MARKETING JOINT SERVICES, MINIMIZING THE BURDEN ON EMPLOYERS WHO USE THE CENTERS, AND PROVIDING EMPLOYER-FOCUSED SERVICES THROUGH A SINGLE POINT OF ENTRY RATHER THAN THROUGH ALL PARTNERING PROGRAMS; AND**
 - **CONTRIBUTING AND PROVIDING OUTCOMES DATA TO THE WIOA SYSTEM THROUGH STRATEGIES FOR COLLECTING AND REPORTING VARIED PROGRAM REPORTING REQUIREMENTS. DESCRIBE THE LDSS REPRESENTATION ON THE LOCAL BOARD TO ENSURE THAT TANF EXPECTATIONS, ROLES, AND RESPONSIBILITIES ARE ADDRESSED IN THE LOCAL AREA.**
- *ALL BULLET POINTS MUST BE ADDRESSED**

Western Maryland has a long-standing commitment to integrating Temporary Assistance for Needy Families (TANF) services into the broader WIOA workforce system to enhance job readiness and placement services for TANF participants. The Western Maryland Consortium (WMC), in collaboration with the Local Departments of Social Services (LDSS) across Allegany, Garrett, and Washington counties, continues to refine coordination efforts to improve service delivery, eliminate barriers to employment, and maximize outcomes for TANF recipients.

DSS and WIOA services are integrated across Western Maryland's three American Job Centers (AJCs), ensuring TANF participants have full access to career services, job placement support, and training opportunities. Discussions are ongoing regarding co-locating TCA/TANF caseworkers at AJCs to enhance service coordination, expedite referrals, and provide on-site employment support to DSS customers.

Workforce staff also provide services at LDSS offices, ensuring TANF recipients are seamlessly referred to Title I career and training services, removing access barriers. A "no wrong door" approach ensures customers can access services at both DSS and AJCs, depending on their specific needs.

A Resource Sharing Agreement (RSA) formalizes financial and in-kind contributions between WIOA and DSS, ensuring that services are coordinated efficiently and that workforce programs align with TANF employment goals. Leveraging Title I WIOA funds, TANF participants can access:

- Individual Training Accounts (ITAs)
- On-the-Job Training (OJT)
- Incumbent Worker Training
- Work-Based Learning Experiences

DSS contributes funding for supportive services, including transportation, childcare, and work-related expenses, ensuring TANF recipients can fully engage in workforce activities. TANF and WIOA funds are aligned to co-enroll participants in employment and training activities that lead to self-sufficiency and career advancement.

Quarterly partner meetings are held to cross-train workforce staff on TANF eligibility, work participation requirements, and supportive services. Training topics include:

- Understanding TANF work requirements
- Referral and co-enrollment processes
- Utilizing the Maryland Workforce Exchange (MWE) for tracking and reporting
- Available supportive services (childcare, transportation, housing)
- Strategies for engaging TANF participants in employment and training

DSS staff are also trained on WIOA-funded programs and how to refer TANF customers for training and employment services.

WIOA partners actively track TANF participants' progress to ensure compliance with TANF work participation requirements. The following data points are monitored and documented:

- Attendance and participation in training or job search activities
- Weekly participation timesheets submitted by clients
- Enrollment and engagement in the Maryland Workforce Exchange (MWE)
- Completion of the Ready to Work Assessment tool
- Job placements and retention outcomes

Regular case management meetings ensure co-enrolled participants meet required work hours and are supported with services that help maintain compliance. DSS and WIOA partners collaborate on data sharing to track employment, training, and retention outcomes for TANF customers participating in workforce programs. Key reporting elements include:

- Job placements and wages
- Credential attainment and training completions
- Retention rates at 30, 60, and 90 days post-employment
- TANF work participation rate compliance

WIOA and DSS staff meet regularly to ensure data integrity and align reporting methodologies for federal and state performance metrics. The Local Departments of Social Services (LDSS) in Allegany, Garrett, and Washington counties are mandated core partners and have representation on the Local Workforce Development Board (LWDB).

LDSS representatives participate in quarterly meetings, ensuring TANF expectations, roles, and responsibilities are embedded in workforce planning and service delivery strategies. Ongoing collaboration ensures that TANF customers receive comprehensive services and that workforce policies align with DSS employment initiatives.

Western Maryland's workforce and DSS partnership continues to evolve, with a focus on enhancing service delivery, strengthening employer connections, and tracking workforce outcomes to support TANF recipients in achieving long-term economic self-sufficiency. Through co-location, cross-training, financial leveraging, and data-sharing, the region ensures seamless access to employment and training opportunities for TANF customers.

(C) DESCRIBE THE LDSS REPRESENTATION ON THE LOCAL BOARD TO ENSURE THAT TANF EXPECTATIONS, ROLES, AND RESPONSIBILITIES ARE ADDRESSED IN THE LOCAL AREA.

The Local Department of Social Services (LDSS) plays a critical role in the Western Maryland Workforce Development Board (WMWDB), ensuring that Temporary Assistance for Needy Families (TANF) expectations, roles, and responsibilities are integrated into local workforce strategies and service delivery. The LDSS representative serves as a key liaison between the TANF program and the broader workforce system.

The LDSS representative ensures that the unique needs of TANF participants are considered in all Board discussions and decisions. They advocate for the integration of TANF services into the American Job Center (AJC) system to support seamless service delivery. As a subject matter expert, the representative provides insights into TANF eligibility requirements, work participation rate (WPR) compliance, and supportive service needs. They guide the Board on leveraging TANF resources to enhance workforce development initiatives.

The LDSS representative actively participates in the development of the WMWDB's strategic plan, ensuring alignment with TANF program goals and local workforce priorities. The representative also contributes to the creation of policies and practices that promote access to employment and training for TANF participants.

LDSS representation on the WMWDB ensures that TANF expectations, roles, and responsibilities are fully addressed in the Local Area. By contributing expertise, fostering collaboration, and advocating for TANF participants, the LDSS representative strengthens the integration of TANF into the workforce system and enhances outcomes for individuals and families.

(D) DESCRIBE WHAT STRATEGIES YOUR BOARD EMPLOYS TO SUPPORT TANF RECIPIENTS IN ACCESSING SKILLS AND CREDENTIALING, LIFE MANAGEMENT SKILLS, AND EMPLOYMENT TO IMPROVE THE FINANCIAL STATUS OF THOSE EXITING THE TANF PROGRAM.

The Western Maryland Workforce Development Board (WMWDB) is committed to equipping TANF recipients with the skills, credentials, and life management strategies needed to achieve long-term financial stability. Through collaboration with the Local Departments of Social Services (LDSS), American Job Centers (AJCs), and workforce partners, the Board ensures that TANF recipients have access to career pathways, employment support, and wraparound services that facilitate self-sufficiency and career advancement.

The Board works with DSS partners and WIOA programs to ensure that TANF recipients can access training and credentialing programs that align with local labor market needs. These strategies include: TANF recipients can enroll in short-term credentialing programs leading to industry-recognized certifications in high-demand sectors. ITAs cover tuition costs, ensuring TANF recipients can gain skills without a financial burden.

OJT provides wage subsidies to employers, incentivizing the hiring and training of TANF participants. Pre-apprenticeships and registered apprenticeships allow TANF recipients to earn wages while obtaining industry certifications. Work experience programs provide hands-on training opportunities for TANF recipients with limited work history.

The Board partners with employers to design job-driven training programs that meet industry needs while ensuring TANF recipients gain employable skills. Incumbent Worker Training supports TANF recipients who are already employed in advancing their careers and increasing wages.

Through partnerships with local community colleges, TANF recipients can enroll in GED preparation courses, basic skills training, and English as a Second Language (ESL) programs. The National External Diploma Program (NEDP) provides an alternative pathway for adults to earn a high school diploma while demonstrating competency in workforce-relevant skills.

TANF recipients can simultaneously enroll in workforce training and adult education to accelerate their skill development. IET models combine literacy, workplace readiness, and technical training to prepare individuals for high-demand occupations.

To address barriers that may prevent TANF recipients from completing training and securing employment, the Board coordinates wraparound support services through DSS, WIOA, and community-based partners. TANF participants receive one-on-one career counseling to develop individualized employment plans (IEPs). WIOA and DSS case managers collaborate to provide career navigation, goal-setting, and job readiness coaching.

The Board ensures that TANF recipients transition from training to employment opportunities through job placement assistance and employer partnerships. AJCs host recruitment events with local employers to connect TANF recipients with job opportunities. Customized job search workshops provide resume writing, interview coaching, and job matching assistance. The Board promotes Work Opportunity Tax Credits (WOTC) and federal bonding programs to encourage businesses to hire TANF recipients. Wage reimbursement through OJT programs helps TANF recipients secure employment with competitive wages.

The Board collaborates with DSS and WIOA partners to create a seamless service model that ensures TANF participants have access to all available workforce resources. TANF staff and WIOA case managers meet regularly to review participant progress and address challenges. Eligible TANF recipients are co-enrolled in WIOA to maximize access to training and employment services.

Through strategic partnerships, cross-agency collaboration, and employer-driven training programs, the Board ensures that TANF recipients have access to the education, skills, and support services needed to achieve long-term self-sufficiency. By addressing barriers, enhancing credentialing opportunities, and fostering employer engagement, the Board helps TANF participants transition into sustainable employment and financial independence.

SECTION 9: SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM EMPLOYMENT AND TRAINING (SNAP E&T)

(A) DESCRIBE THE PROCESS THE LOCAL WIOA PARTNERS UTILIZE, OR PLAN TO UTILIZE, TO SUPPORT SNAP WORK REGISTRANTS IN ACCESSING AVAILABLE SUPPORT AND WORKFORCE DEVELOPMENT PROGRAMS, AND HOW MANY SNAP WORK REGISTRANTS CURRENTLY EXIST IN YOUR AREA.

The Western Maryland Workforce Development Board (WMWDB) and its core partners maintain a strong partnership with the Maryland Department of Human Services (DHS) and the local Departments of Social Services (DSS) in Allegany, Garrett, and Washington Counties to ensure that Supplemental Nutrition Assistance Program (SNAP) participants receive comprehensive employment and training services that support both workforce advancement and continued benefit eligibility.

Each county's DSS serves as the primary referral source for SNAP Employment and Training (SNAP E&T) participants. Upon referral, individuals are connected to the region's American Job Centers (AJCs), where they receive orientation, assessment, and individualized case management. AJC staff coordinate with DSS caseworkers to ensure that participants' work requirements under 7 CFR §273.7 are met through participation in approved employment, education, or training activities.

Services provided to SNAP customers include job readiness workshops, career counseling, skills assessments, job search assistance, and access to occupational training through the Maryland Eligible Training Provider List (ETPL). Supportive services such as transportation vouchers, childcare referrals, and digital literacy training are available to address barriers to participation and retention. The WMWDB ensures consistent service delivery across all three counties through a coordinated referral and reporting process. DSS staff and AJC career counselors share information, within applicable confidentiality guidelines, to document participation hours and progress toward employment goals. This coordination ensures that participants meet federal work participation requirements while building sustainable career pathways that lead to self-sufficiency.

In partnership with the Maryland Department of Labor and DHS, the WMWDB explores opportunities to align SNAP E&T activities with other WIOA-funded programs, such as On-the-Job Training, Work Experience, and Career Pathways initiatives. This integrated approach enhances efficiency, avoids duplication, and maximizes the impact of available resources.

Through this regional partnership model, SNAP participants in Western Maryland receive equitable access to employment, education, and training services, supporting compliance with benefit requirements while advancing economic independence.

(B) LIST THE AVAILABLE SNAP E&T THIRD-PARTY PARTNERS IN YOUR LOCAL AREA AND DESCRIBE HOW THE THIRD-PARTY PARTNERS ARE BEING ENGAGED TO ENSURE THEY ARE AWARE OF ALL WORKFORCE DEVELOPMENT PROGRAMS AVAILABLE IN THE WIOA SYSTEM, STREAMLINE RESOURCES, AND PREVENT DUPLICATION OF SERVICES.

According to the Maryland State Workforce Plan, there are 33 third-party providers of SNAP E&T training. DHS uses Third-Party Partner Programs (50/50 SNAP E&T) to provide direct SNAP E&T services to customers statewide. These 33 Third-Party Partners include: Baltimore City Community College, BCR Cyber, Bugg and Hardnett, Byte Back, Center for Urban Families, Civic Works, Community College of Baltimore County, Community Engagement & Consultation Group, Inc., Goodwill Industries of the Chesapeake, Inc, Grow Home, Horizon Goodwill Industries, Humanim, I'm Still

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Standing Community Development Corporation, International Rescue Committee, It Works, Jane Addams Rescue Corporation Baltimore, Lifestyles, LightHouse, Living Classroom, Maryland Food Bank- Food Works Program, MCVET, National Center on Institutions and Alternatives Vocational Training, New Destiny Health, Npower, Pass It On, Paul's Place, Per Scholas, Roca, Inc., The Maryland Center for Hospitality Training, Union Kitchen, Vehicles For Change, Work First Foundation, PA2E, and Carroll Community College.

Many of these third-party providers are in Baltimore City. Western Maryland's workforce partners will work with SNAP work registrants to determine if these services are appropriate and accessible.

SECTION 10: COMMUNITY SERVICE BLOCK GRANT FUNCTIONS

A. LIST THE COMMUNITY SERVICE BLOCK GRANT (CSBG) PROVIDERS IN YOUR SERVICE AREA AND WHETHER THEY PROVIDE EMPLOYMENT AND TRAINING ACTIVITIES.

The Western Maryland Workforce Development Board (WMWDB) collaborates with several **Community Service Block Grant (CSBG)** providers that play a critical role in addressing poverty and supporting economic self-sufficiency. Below is a list of CSBG providers in the region, along with their involvement in employment and training activities.

In Western Maryland, two entities receive CSBG funding for employment and training activities: the Garrett County Community Action Committee (GCCAC) and the Allegany County Human Resources Development Commission. These entities provide the following services:

- Food & Nutrition Services
- Housing Counseling & Housing First
- Transitional Shelter & Homeless Services
- Outreach & Transportation Services

While Washington County Community Action Council (WCCAC) does not receive CSBG funding for employment and training activities, it continues to engage with Western Maryland's workforce system.

B. DESCRIBE YOUR IMPLEMENTATION AND COORDINATION PROCESS TO ENHANCE THE PROVISION OF WORKFORCE DEVELOPMENT SERVICES FOR INDIVIDUALS RECEIVING CSBG-SUPPORTED SERVICES, WHICH INCLUDES:

- POTENTIAL CO-LOCATION OF CAAS AND/OR WIOA PARTNERS AT AJCS OR CAAS, DEPENDING ON THE NATURE OF LOCAL PARTNERSHIPS AND OPERATIONS;
- LEVERAGING EXISTING FINANCIAL AND IN-KIND CONTRIBUTIONS TO THE WIOA SYSTEM TO ENSURE COORDINATION OF SERVICES PROVIDED BY MULTIPLE PROGRAMS, CREATING A SEAMLESS APPROACH TO DELIVERING SERVICES;
- CROSS TRAINING AND PROVIDING TECHNICAL ASSISTANCE TO ALL WIOA PARTNERS ABOUT CSBG;
- ENSURING THAT ACTIVITIES ARE COUNTABLE AND TRACKED FOR CSBG PERFORMANCE METRICS;
- ACCESS TO BUSINESS SERVICES AND EMPLOYER INITIATIVES TO ATTRACT AND BETTER SERVE EMPLOYERS BY MARKETING JOINT SERVICES, MINIMIZING THE BURDEN ON EMPLOYERS WHO USE THE CENTERS, AND

**PROVIDE EMPLOYER-FOCUSED SERVICES THROUGH A SINGLE POINT OF ENTRY RATHER THAN THROUGH ALL PARTNERING PROGRAMS; AND
▪ CONTRIBUTING AND PROVIDING BASELINE OUTCOMES DATA TO THE WIOA SYSTEM THROUGH STRATEGIES FOR COLLECTING AND REPORTING VARIED PROGRAM REPORTING REQUIREMENTS.
*ALL BULLET POINTS MUST BE ADDRESSED**

The Western Maryland Workforce Development Board (WMWDB) collaborates with Community Action Agencies (CAAs) and WIOA partners to provide workforce development services to individuals receiving Community Services Block Grant (CSBG)-supported services. Through strategic partnerships, resource alignment, and coordinated service delivery, the Board ensures that individuals experiencing economic hardship have access to employment, training, and supportive services that lead to self-sufficiency.

AJCs and CAAs operate as partners, referring individuals between programs based on need to ensure a seamless service experience. Workforce Development staff provide services on-site at CAC facilities, making workforce resources more accessible to individuals receiving CSBG-supported services. Referral systems between CAAs and AJCs ensure that CSBG participants can access WIOA-funded training, job search assistance, and career services. Quarterly partner meetings facilitate discussions on expanding co-location opportunities based on local needs and available resources.

The Resource Sharing Agreement (RSA) between WIOA and CAAs ensures that workforce services are aligned and not duplicated. CSBG funds are leveraged to support wraparound services (e.g., transportation, childcare, housing support) for individuals enrolled in WIOA workforce programs. WIOA funds are used to provide workforce training for CSBG recipients, ensuring that individuals in economic distress have access to career pathways. CSBG participants are co-enrolled in WIOA services, expanding their access to employment opportunities, credentialing, and work-based learning.

AJC and WIOA staff receive regular training on CSBG services to enhance awareness and referral accuracy. Training topics include:

- Eligibility and enrollment process for CSBG services
- Coordination of supportive services (housing, utilities, food assistance)
- Best practices for referring CSBG participants to workforce development programs

Community Action Agency staff are trained on WIOA programs, ensuring mutual understanding and efficient service coordination.

AJCs and CAAs collaborate on employer outreach, ensuring that CSBG participants are included in job placement and hiring initiatives. A single point of contact for businesses streamlines access to:

- On-the-Job Training (OJT)
- Work-based learning programs for CSBG participants

- Recruitment and hiring events targeting individuals receiving CSBG services

WIOA business service representatives coordinate with CAAs to ensure that individuals with barriers to employment receive job coaching and placement support.

Through co-location, financial leveraging, cross-training, data tracking, and business engagement, the WMWDB ensures that CSBG recipients receive comprehensive workforce services that lead to long-term employment and self-sufficiency. By strengthening partnerships with CAAs, the Board enhances service delivery, removes barriers to employment, and expands economic opportunities for individuals facing financial hardship.

C. DESCRIBE THE CAA REPRESENTATION ON YOUR BOARD TO ENSURE THAT CSBG EXPECTATIONS, ROLES, AND RESPONSIBILITIES ARE ADDRESSED IN THE LOCAL AREA. (REFER TO GWDB'S LOCAL BOARD CERTIFICATION POLICY)

The Western Maryland Workforce Development Board (WMWDB) ensures that Community Action Agency (CAA) representation is included to address Community Service Block Grant (CSBG) expectations, roles, and responsibilities. This representation ensures that low-income individuals and families benefit from coordinated workforce development services that align with CSBG and WIOA goals.

The Garrett County CAC has a representative to the Board. CAA representatives attend core partner meetings.

SECTION 11: JOBS FOR VETERANS STATE GRANTS FUNCTIONS

A. DESCRIBE HOW YOUR BOARD WILL PROVIDE PRIORITY OF SERVICE TO VETERANS AND THEIR ELIGIBLE SPOUSES.

The Western Maryland Workforce Development Board (LWDB) ensures that veterans and their eligible spouses receive **priority of service** in all workforce development programs and services funded under the Workforce Innovation and Opportunity Act (WIOA). This commitment aligns with federal regulations under the Jobs for Veterans Act (JVA) and ensures that veterans and their eligible spouses are prioritized for training, employment opportunities, and supportive services.

Priority of service means that Veterans and eligible spouses receive first access to: Job search assistance; Career counseling and skills assessments; WIOA Title I-funded training programs, including occupational skills training, apprenticeships, and on-the-job training (OJT); and Supportive services, including transportation, childcare, and housing assistance.

Veterans are defined in 38 USC § 101(2) as a “person who served in the active military, naval, air, or space service, and who was discharged or released therefrom under conditions other than dishonorable.” It is important to note that this definition does not include a minimum number of days of service; only that their discharge must not be dishonorable.

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

Further, 38 USC §101(24) and relevant guidance, the inclusion of “active” in the definition of a Veteran means any of the following:

- Active duty;
- Any period of active duty for training during which the individual concerned was disabled or died from a disease or injury incurred or aggravated in the line of duty;
- Any period of inactive duty training during which the individual concerned was disabled or died: (1) from an injury incurred or aggravated in the line of duty; or (ii) from an acute myocardial infarction, a cardiac arrest, or a cerebrovascular accident occurring during such training.

An “Eligible Person” as defined in 38 USC § 4101(5) and 38 USC § 4101(5) is:

- (1) The spouse of any person who died of a service-connected disability;

(2) The spouse of any member of the Armed Forces serving in active duty who, at the time of application for assistance under this chapter, is listed, pursuant to Section 556 of Title 37 and regulations issued thereunder, by the Secretary concerned in one or more of the following categories and has been so listed for a total of more than ninety (90) days:

- a) missing in action;
- b) captured in the line of duty by a hostile force, or
- c) forcibly detained or interned in the line of duty by a foreign government or power; or,

(3) The spouse of any person who has a total disability permanent in nature resulting from a service-connected disability, or the spouse of a veteran who died while a disability so evaluated was in existence.

Federal law and interpretation (i.e., TEGL 10-09), the defines a “veteran” as a person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2). Active service includes full-time Federal service in the National Guard or a Reserve component. This definition of “active service” does not include full-time duty performed strictly for training purposes (i.e., that which often is referred to as “weekend” or “annual” training), nor does it include full-time active duty performed by National Guard personnel who are mobilized by State rather than Federal authorities (State mobilizations usually occur in response to events such as natural disasters).

“Eligible spouse” as defined at section 2(a) of the JVA (38 U.S.C. 4215[a]) means the spouse of any of the following:

1. Any veteran who died of a service-connected disability;
2. Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - a. Missing in action;
 - b. Captured in the line of duty by a hostile force; or
 - c.. Forcibly detained or interned in the line of duty by a foreign government or power;
3. Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
4. Any veteran who died while a disability was in existence. A spouse whose eligibility is derived from a living veteran or service member (i.e., categories b. or c. above) would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level).

Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

The priority of service regulations refer to those veterans and spouses who are eligible for priority of service as “covered persons” and refer to those not eligible for priority of service as “non-covered persons.”

In accordance with TEGL 10-09, this means that “a veteran or an eligible spouse either receives access to a service earlier in time than a non-covered person or, if the resource is limited, the veteran or eligible spouse receives access to the service instead of or before the non-covered person.”

In accordance with the State Workforce Plan and TEGL 10-09, some programs have certain priority requirements for certain groups of people. In that event, priority must be given in this order:

1. Veterans and eligible spouses who meet the mandatory priorities, spending requirement, or limitation must receive the highest level of priority for the program or service;
2. Non-covered persons who meet the program’s mandatory priority or spending requirement or limitation then receive the second level of priority for the program or service;
3. Veterans and eligible spouses outside the program-specific mandatory priority, spending requirement, or limitation then receive the third level of priority for the program or service; and
4. Non-covered persons outside the program-specific mandatory priority, spending requirement, or limitation then receive the fourth level of priority for the program or service.

CUSTOMER SERVICE FLOW FOR VETERANS

AJC staff provides core services and initial assessments to veterans.

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

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

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

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

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

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

VERIFYING VETERAN STATUS

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

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

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

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

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

VETERANS AND SPOUSES WHO ARE DISLOCATED WORKERS

To receive services under the WIOA Title I - Dislocated Worker program, a dislocated worker is someone who:

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

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

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

If a Veteran meets the definition of a dislocated worker, then they may also be eligible to receive Priority of Service. Again, for WIOA Title I programs, Priority of Service is available to any Veteran who has served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable. AJCs may consider documentation of a service member's release from active duty on a specific date as equivalent to a layoff notice for WIOA.

Dislocated Worker Program eligibility. However, service members are not eligible for Priority of Service until they leave active duty. In the case of separating service members, because they may be on a terminal leave from the military, a separating service member may begin to receive career services while the service member may still be part of the Active Duty military, but has an imminent separation date. It is appropriate to provide career services to separating service members who will be separating from the military, provided that their discharge will be anything other than dishonorable.

PARTNERSHIPS WITH VETERAN-SPECIFIC PROGRAMS

JVSG-funded personnel are co-located within Western Maryland's comprehensive centers. These employees of the Maryland Department of Labor serve qualifying veterans and their spouses.

Disabled Veterans' Outreach Program (DVOP) specialists are co-located at the AJC to provide intensive case management, career counseling, and support to veterans with Qualifying Barriers to

Employment, including disabilities, homelessness, or justice involvement in accordance with 38 U.S.C. Section 4103A(a).

Local Veterans Employment Representatives (LVERs) engage with local employers to identify job opportunities and promote the hiring of veterans. They organize veteran-specific hiring events and job fairs in accordance with 38 U.S.C. Section 4104(b).

MONITORING AND ACCOUNTABILITY

The periodic monitoring reviews of services provided at Western Maryland's AJCs are conducted by the Regional Local Veterans Employment Representative (RLVER) and/or designated staff assigned to the program by the Maryland Department of Labor. These reviews ensure compliance with priority service requirements. Data on veterans' participation and success in workforce programs is regularly reported to ensure effectiveness and inform program enhancements.

Through priority of service, dedicated veteran staff, and strong employer partnerships, the LWDB ensures that veterans and their eligible spouses in Western Maryland receive the support they need to secure meaningful employment and achieve long-term success. This approach honors their service while maximizing their contributions to the local workforce.

C. DESCRIBE HOW YOUR BOARD WILL ENGAGE LOCAL VETERANS EMPLOYMENT REPRESENTATIVES IN ENGAGING AND PROVIDING SERVICES TO LOCAL BUSINESSES.

Local Veterans Employment Representatives (LVERs) will engage businesses and create employment opportunities for veterans. LVERs are critical in bridging the gap between employers seeking skilled talent and veterans looking for meaningful employment. LVERs provide employers with information on:

- Incentives for hiring veterans, such as the Work Opportunity Tax Credit (WOTC);
- The benefits of participating in veteran-focused programs, and,
- Best practices for recruiting and retaining veteran employees.

The Local Board will support the LVER by promoting LVER services through social media, job fairs, and email blasts.

SECTION 12: TRADE ADJUSTMENT ASSISTANCE FOR WORKERS PROGRAM FUNCTIONS

(A) DESCRIBE HOW TRADE ADJUSTMENT ASSISTANCE (TAA) SERVICES WILL BE PROVIDED IN THE AJC SYSTEM WITHIN YOUR AREA.

The Western Maryland Workforce Development Board (WMWDB) ensures that **Trade Adjustment Assistance (TAA)** services are seamlessly integrated into the **American Job Center (AJC)** system, following Maryland Labor's TAA policy (MPI 2-22) and the U.S. Department of Labor's TAA Final Rule. This approach provides dislocated workers impacted by foreign trade with access to employment and training services to support their reentry into the workforce.

Trade-affected workers will be co-enrolled with the WIOA Dislocated Worker program or other appropriate program. TAA staff and Western Maryland's workforce partners will coordinate efforts to provide opportunities for Trade-affected workers to obtain skills, services, resources, and support quickly.

The WMWDB ensures that TAA services are fully integrated into the AJC system to provide comprehensive support for workers impacted by trade-related job losses. Through coordinated case management, robust training opportunities, and employer engagement, the Board empowers TAA participants to achieve meaningful reemployment in high-demand industries.

(B) DESCRIBE HOW TITLE I STAFF WILL PROVIDE THE TAA SERVICES LISTED ABOVE IN AN INTEGRATED MANNER.

The Western Maryland Workforce Development Board (WMWDB) ensures that Trade Adjustment Assistance (TAA) services are delivered in a fully integrated manner within the American Job Centers (AJCs). Title I staff work collaboratively with TAA program representatives, WIOA partners, and business service teams to provide comprehensive support for trade-affected workers, ensuring a seamless transition from layoff to reemployment.

Title I staff conduct initial intake and assessments to determine a worker's eligibility for TAA services and provide an overview of available benefits. Trade-affected workers are registered in the Maryland Workforce Exchange (MWE) for career services, labor market information, and job search assistance. Rapid Response services are coordinated to connect workers with TAA, WIOA training opportunities, and supportive services. Workers are made fully aware of available TAA benefits, including training assistance, wage subsidies, relocation support, and job search allowances.

Title I staff work with TAA case managers to guide trade-affected workers through training options and career pathways. Completion of the TAA application in MWE is facilitated by Title I career counselors to ensure all necessary documentation is submitted. Title I staff assist workers in meeting the six criteria for TAA training eligibility, ensuring that training programs are:

- Aligned with labor market demand

- Cost-effective
- Likely to result in long-term employment

Individual Employment Plans (IEPs) are created or reviewed with input from TAA case managers, ensuring alignment with training and career goals. Approval of TAA training programs, training contracts, and training waivers is handled by TAA staff in coordination with Title I career counselors.

Title I and TAA staff collaborate to track participant progress through training and job search activities. Benchmarks are reviewed every 60 days to ensure workers are progressing toward training completion and job placement. A service is provided at least every 90 days to maintain engagement and address barriers to training or employment.

By integrating Title I and TAA services, the Western Maryland AJCs ensure that trade-affected workers receive seamless support from dislocation to reemployment. Through co-enrollment, training assistance, and employer engagement, Title I staff play a vital role in helping trade-affected workers transition into new, high-quality careers with long-term growth potential.

(C) DESCRIBE HOW TRADE PARTICIPANTS WILL BE CO-ENROLLED IN OTHER PROGRAMS.

The Western Maryland Workforce Development Board (WMWDB) ensures that Trade Adjustment Assistance (TAA) participants are co-enrolled in other workforce development programs to maximize resources, provide comprehensive services, and achieve optimal outcomes. This approach is guided by Maryland Labor's TAA policy (MPI 2-22) and the USDOL TAA Final Rule, which emphasize the integration of TAA services with WIOA and other workforce programs.

The Western Maryland Workforce Development Board (WMWDB) ensures that Trade Adjustment Assistance (TAA) participants are co-enrolled in WIOA and other workforce programs to provide a comprehensive and streamlined service experience. Co-enrollment maximizes access to training, supportive services, and job placement opportunities while optimizing the use of public workforce system resources.

Trade-affected workers meet with AJC staff for an initial assessment, during which they are informed about the benefits of co-enrollment in WIOA Title I services, Wagner-Peyser, and other partner programs. Eligibility for WIOA Dislocated Worker and Adult Programs is assessed, and if qualified, participants are enrolled in both TAA and WIOA to expand access to job training, employment services, and supportive resources. Enrollment in the Maryland Workforce Exchange (MWE) ensures that co-enrolled participants have a single access point for job matching, career counseling, and training opportunities. If a participant declines co-enrollment or is ineligible, AJC staff document the reason and maintain records while ensuring continued access to TAA benefits and services.

By co-enrolling TAA participants in WIOA and other workforce programs, they gain access to:

- **Training and Credentialing** - Individual Training Accounts (ITAs) to fund industry-recognized certifications. On-the-Job Training (OJT) and apprenticeships for hands-on learning opportunities. Customized training programs through employer partnerships.
- **Employment Services and Career Coaching** - Job search assistance, resume development, and interview preparation; career counseling and individual employment planning (IEP); access to hiring events and employer connections
- **Supportive Services to Reduce Barriers** - Transportation assistance, childcare support, and housing referrals; Financial literacy and budgeting workshops; Referrals for mental health and other community resources
- Ongoing Case Management and Follow-Up

Through an integrated co-enrollment process, trade-affected workers in Western Maryland receive comprehensive workforce services that prepare them for sustainable, high-quality employment. By ensuring that TAA participants are fully supported through WIOA, Wagner-Peyser, and other workforce programs, the Board maximizes the effectiveness of federal and state workforce investments while helping individuals successfully transition into new careers.

SECTION 13: UNEMPLOYMENT INSURANCE FUNCTIONS

(A) DESCRIBE HOW WIOA TITLE I AND TITLE III PARTNERS WILL SUPPORT UNEMPLOYMENT INSURANCE CLAIMANTS AND PROVIDE MEANINGFUL ACCESS TO UNEMPLOYMENT INSURANCE CLAIMANTS, AS REQUIRED BY WIOA.

WIOA Title I and Title III partners in Western Maryland support Unemployment Insurance (UI) claimants and ensure meaningful access to services through the following strategies. Wagner-Peyser and Title I staff are the designated partners at the AJC who provide basic information on Unemployment Insurance (UI). Staff members counsel individuals on UI claims, helping them understand the process and guiding them through available resources. The AJCs are consistently updated with UI brochures and information for both staff and job seekers.

Wagner-Peyser staff facilitate workshops for UI claimants to assist in their return to employment. These workshops include:

- Career services assistance
- Information on job search strategies
- Resume writing and interview techniques
- UI eligibility reviews

WIOA Title I staff actively participate in RESEA and ROW programs to ensure UI claimants have access to workforce development services. Claimants are provided job search assistance, career counseling, and access to training programs through the Maryland Workforce Exchange (MWE). Workforce development partners work with UI claimants to identify career pathways and upskilling opportunities. Incumbent worker training, on-the-job training (OJT), and transitional employment programs are available to UI claimants seeking new career opportunities.

Business services teams engage employers to identify in-demand job opportunities for UI claimants. AJCs host job fairs and hiring events, ensuring claimants have direct access to employment prospects. Claimants can also access online tools through MWEJobs.maryland.gov, which provides self-service job searches, labor market information, and resume-building tools.

UI claimants can be referred to supportive services such as transportation assistance, childcare resources, and financial aid for training. The Division of Rehabilitation Services (DORS) assists claimants with disabilities, ensuring accessibility to employment and training services. Western Maryland is working on a direct point of contact with the UI system to enhance coordination.

There is a concerted effort to integrate UI services with workforce programs, ensuring that claimants receive both unemployment benefits and reemployment assistance. UI staff members and Title I representatives collaborate to streamline processes and reduce wait times for claimants. These efforts

ensure that UI claimants receive timely, accessible, and comprehensive employment services while transitioning back into the workforce.

(B) DESCRIBE HOW YOUR BOARD WILL UTILIZE THE WAGNER-PEYSER PROGRAM AND THE RESEA AND ROW PROGRAMS TO PROVIDE ACCESS TO LOCAL WORKFORCE DEVELOPMENT SERVICES FOR UNEMPLOYMENT INSURANCE CLAIMANTS.

The Western Maryland Workforce Development Board leverages the Wagner-Peyser program alongside the Reemployment Services and Eligibility Assessment (RESEA) and Reemployment Opportunity Workshop (ROW) programs to provide Unemployment Insurance (UI) claimants with comprehensive access to local workforce development services.

Wagner-Peyser staff conduct workshops tailored for UI claimants, focusing on career services that expedite reemployment. These sessions cover job search strategies, resume development, and interview preparation. WIOA Title I personnel actively engage in RESEA and ROW initiatives, ensuring UI claimants are seamlessly connected to workforce development services. This collaboration provides claimants with access to training opportunities, career counseling, and supportive services essential for successful reentry into the workforce.

In response to the COVID-19 pandemic, services have transitioned to virtual platforms. Western Maryland Title I staff participate in online RESEA and ROW workshops, which have become valuable tools for recruiting participants into WIOA Title I training programs. This integrated approach aligns with the guidance outlined in Training and Employment Guidance Letter No. 11-23, which emphasizes the importance of coordinated service delivery to enhance employment outcomes for UI claimants.

By combining the resources and expertise of the Wagner-Peyser program with RESEA and ROW initiatives, the Board ensures that UI claimants in Western Maryland receive comprehensive support tailored to their reemployment needs.

SECTION 14: SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM FUNCTIONS

A. LIST THE SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP) PROVIDERS IN YOUR AREA AND HOW SCSEP IS ADMINISTERED, INCLUDING GRANTEE AND SUBGRANTEE INFORMATION, IF APPLICABLE.

The Maryland Department of Labor's Division of Workforce Development and Adult Learning (MD Labor DWDAL) is the State Grantee responsible for administering the Senior Community Service Employment Program (SCSEP) in Western Maryland, covering Allegany, Garrett, and Washington Counties.

MD Labor DWDAL directly administers the SCSEP program in Western Maryland, with no sub-grantee organizations involved. MD Labor employs an Employment Specialist in each Local Area to manage SCSEP activities and provide direct support to participants. SCSEP provides subsidized, part-time community service training positions for low-income individuals aged 55 and older, with a goal of transitioning them into unsubsidized employment.

This program plays a critical role in helping older workers re-enter the workforce by providing them with work-based learning opportunities, job training, and access to employment resources.

B. DESCRIBE HOW SCSEP SERVICES WILL BE INTEGRATED WITHIN THE AJC SYSTEM IN YOUR AREA, INCLUDING KEY COMPONENTS OF THE SCSEP PROGRAM AVAILABLE LOCALLY.

The Senior Community Service Employment Program (SCSEP) is fully integrated into the American Job Center (AJC) system in Western Maryland to provide older workers with the necessary tools and support for reemployment.

SCSEP participants are registered in MWE to track their job interests, host agency placements, and employment search progress. Employment specialists maintain case notes and monitor participant progress through MWE. SCSEP participants receive training opportunities within the AJC system, including front desk support and resource area assistance. They gain hands-on experience working within the AJCs, helping them develop skills relevant to administrative and customer service roles.

Participants benefit from a full range of AJC services, including:

- Full-time job search assistance
- Job readiness training
- Interviewing and resume development
- Utilization of labor market information (LMI)

When an applicant inquires about SCSEP, they meet with an employment specialist at the AJC. The specialist registers them in MWE, explains the SCSEP program and its process, and works to match them with a suitable host agency.

This integration ensures that older job seekers in Western Maryland can fully utilize AJC resources while receiving the specialized training, job placement, and career development support provided through SCSEP.

SECTION 15: WIOA SECTION 188 AND EQUAL OPPORTUNITY FUNCTIONS

A. PROVIDE THE DESIGNATION OF THE LOCAL EQUAL OPPORTUNITY OFFICER, INCLUDING THEIR NAME, LOCATION, EMAIL, PHONE NUMBER, AND TTY (OR EQUIVALENT).

Kimberly McMurtrie
Western Maryland Consortium
33 W. Washington Street
Hagerstown, MD 21740
Email: kmcmurtrie@westmdcon.org
Phone: 301-791-3164

The facilities and equipment are ADA compliant and have a designated Equal Opportunity Officer (EO). There are signs posted in the Centers that language assistance is available for non-English speakers. In addition, the centers use the Language Identification Card to help identify the language the individual speaks. Finally, we use the language line over the phone interpreting services and policies related to translation and interpretation.

The Board ensures that the One-Stop Career Centers partner with organizations that openly promote equal opportunity in their programs.

B. EXPLAIN HOW AJC OPERATORS AND PARTNERS WILL ENSURE PHYSICAL AND PROGRAMMATIC ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES AND LIMITED ENGLISH PROFICIENCY. INCLUDE PLANS FOR STAFF TRAINING AND SUPPORT TO ADDRESS THESE NEEDS. (SEE WIOA SECTION 188, 29 CFR PART 38, AND THE AMERICANS WITH DISABILITIES ACT)

The Western Maryland Workforce Development Board, in collaboration with AJC operators and partners, is committed to ensuring full accessibility for individuals with disabilities and Limited English Proficiency (LEP) in compliance with WIOA Section 188, 29 CFR Part 38, and the Americans with Disabilities Act (ADA).

All AJC locations are fully ADA-compliant and undergo regular accessibility assessments to ensure compliance with nondiscrimination and equal opportunity standards. Centers feature:

- Automatic push-button doors
- Wheelchair-accessible workstations
- Adjustable-height computer stations
- Accessible restrooms and pathways

In partnership with DORS, AJCs feature computer workstations equipped with assistive software (e.g., screen readers, magnifiers, text-to-speech software). The partners also have sign language interpreters available for deaf and hard-of-hearing customers. Large print and braille materials can be provided for individuals with visual impairments.

A designated Equal Opportunity (EO) Officer ensures compliance with accessibility laws and facilitates reasonable accommodations for individuals with disabilities. AJC partners with organizations such as the Division of Rehabilitation Services (DORS) to provide workforce services tailored to individuals with disabilities. Customers are informed about their rights to request reasonable accommodations through visible signage and printed materials.

Language Identification Cards are available to help customers indicate their preferred language for assistance. Staff members are trained to utilize over-the-phone interpretation services for LEP customers. At least three AJC staff members speak and write fluent Spanish to assist Spanish-speaking job seekers. In-person foreign Language Interpreters are available upon request for other languages. Key program materials, signage, and forms are translated into multiple languages commonly spoken in Western Maryland. Digital resources and websites are accessible in multiple languages for online users.

Training on ADA, WIOA Section 188, and Language Access Services: All AJC staff receive regular training on:

- Disability awareness and inclusion
- Best practices for assisting individuals with disabilities
- Effective use of assistive technology and accessibility tools
- Language access policies and LEP service provision

Training is conducted in partnership with DORS and community disability organizations. AJC centers follow universal design principles, ensuring accessibility for all customers. Feedback from customers with disabilities and LEP individuals is regularly collected to improve accessibility.

Workforce Centers conduct ongoing accessibility assessments to identify and address potential barriers. The Equal Opportunity Officer oversees ADA compliance and reviews accessibility policies in alignment with federal and state laws. By integrating physical, programmatic, and linguistic accessibility measures, Western Maryland's AJCs ensure that all job seekers, including individuals with disabilities and LEP individuals, receive equal access to workforce services and opportunities.

C. PROVIDE AN ACKNOWLEDGMENT THAT THE LOCAL BOARD UNDERSTANDS THAT, WHILE SECTION 188 OF WIOA AND 29 CFR PART 38 ENSURE EQUAL OPPORTUNITY FOR INDIVIDUALS WITH DISABILITIES, SUB-RECIPIENTS MAY ALSO BE SUBJECT TO THE REQUIREMENTS OF:

- **SECTION 504 OF THE REHABILITATION ACT, WHICH PROHIBITS DISCRIMINATION AGAINST INDIVIDUALS WITH DISABILITIES BY RECIPIENTS OF FEDERAL FINANCIAL ASSISTANCE;**

- **TITLE I OF THE ADA, WHICH PROHIBITS DISCRIMINATION IN EMPLOYMENT BASED ON DISABILITY;**
 - **TITLE II OF THE ADA, WHICH PROHIBITS STATE AND LOCAL GOVERNMENTS FROM DISCRIMINATING ON THE BASIS OF DISABILITY;**
 - **SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT; AND**
 - **MARYLAND ANTI-DISCRIMINATION LAWS, INCLUDING 5 MD. STATE GOVERNMENT CODE ANN. §10-1101, WHICH STIPULATES THAT ORAL LANGUAGE SERVICES MUST BE DELIVERED ON-SITE FOR THOSE IN FREQUENT CONTACT WITH A SERVICE PROVIDER.**
- *ALL BULLET POINTS MUST BE ADDRESSED**

The Western Maryland Workforce Development Board (WMWDB) acknowledges and understands that, in addition to compliance with Section 188 of WIOA and 29 CFR Part 38, sub-recipients of federal funds must adhere to the following additional legal requirements to ensure equal opportunity and non-discrimination for individuals with disabilities and others.

D. DESCRIBE HOW YOUR BOARD WILL ENSURE MEANINGFUL ACCESS TO ALL CUSTOMERS.

The Western Maryland Workforce Development Board (WMWDB), along with One-Stop Partners (Partners) and the One-Stop Operator (Operator), is committed to ensuring access to American Job Center (AJC) services and WIOA programs for all eligible individuals, regardless of disability, language proficiency, or other barriers to employment.

The Board, Partners, and Operator uphold equal opportunity and universal access as core values. A non-discriminatory service environment ensures that all individuals, including those with disabilities and Limited English Proficiency (LEP), have full access to workforce programs and services. Oversight and monitoring by WMWDB ensure that WIOA Title I operations adhere to federal and state Equal Employment Opportunity (EEO) regulations.

AJCs are fully ADA-compliant, featuring:

- Wheelchair-accessible pathways
- Adaptive workstations for individuals with disabilities
- Automatic door openers and accessible restrooms

Customers have access to:

- Assistive technology, such as screen readers, text-to-speech software, and magnifiers
- Sign language interpreters for deaf and hard-of-hearing individuals
- Alternative format materials (large print, braille, and digital formats)

Language Line Services are available for real-time interpretation over the phone. Language Identification Cards help customers indicate their preferred language for assistance. At least three AJC staff members speak and write fluent Spanish to assist Spanish-speaking job seekers. Translated

materials and digital content in multiple languages ensure LEP individuals receive critical workforce information.

Cross-agency training ensures consistent service delivery at various entry points and locations. AJC staff receive ongoing training on disability inclusion, cultural competency, and language access policies to support diverse job seekers effectively. Community partnerships, including collaboration with the Division of Rehabilitation Services (DORS) and local disability advocacy groups, enhance workforce accessibility. Regardless of where customers first engage with the workforce system, they receive consistent, high-quality services. Virtual services, mobile workforce units, and remote accessibility options expand workforce system reach. Regular accessibility audits identify barriers to services. Customers are encouraged to provide feedback on service accessibility, ensuring continuous enhancements to universal access strategies.

The Western Maryland Workforce Development Board ensures meaningful physical, programmatic, and linguistic access by embedding universal design principles, staff training, and compliance monitoring across all American Job Centers and workforce programs. This commitment guarantees that all job seekers, regardless of disability or language proficiency, can effectively engage with workforce development services.

- E. DESCRIBE YOUR BOARD'S PROCEDURE FOR HANDLING GRIEVANCES AND COMPLAINTS FROM PARTICIPANTS AND OTHER INTERESTED PARTIES AFFECTED BY THE LOCAL AJC SYSTEM, INCLUDING PARTNERS AND SERVICE PROVIDERS. (29 CFR 38.69-97) PROVIDE A SEPARATE DESCRIPTION FOR THE FOLLOWING:**
- **COMPLAINTS OF DISCRIMINATION BASED ON RACE, COLOR, RELIGION, SEX, NATIONAL ORIGIN, AGE, DISABILITY, POLITICAL AFFILIATION, OR BELIEF, AS WELL AS CITIZENSHIP OR PARTICIPATION IN WIOA TITLE I-FUNDED PROGRAMS.**
 - **COMPLAINTS AND GRIEVANCES UNRELATED TO DISCRIMINATION, INCLUDING LABOR STANDARDS VIOLATIONS.**
 - **REMEDIES FOR WIOA TITLE I VIOLATIONS MAY INCLUDE SUSPENSION OR TERMINATION OF PAYMENTS, BARRING PLACEMENT WITH NON-COMPLIANT EMPLOYERS, REINSTATEMENT OF EMPLOYEES, PAYMENT OF LOST WAGES/BENEFITS, AND OTHER RELIEF WHERE APPLICABLE.**

The Western Maryland Workforce Development Board (WMWDB), in collaboration with One-Stop Partners (Partners) and the One-Stop Operator (Operator), ensures that all individuals have the right to file grievances and complaints regarding their experiences with the American Job Center (AJC) system and WIOA-funded programs.

The Board follows nondiscrimination and equal opportunity principles outlined in WIOA Section 188, 29 CFR 38.69-97, ensuring that all complaints are handled fairly, promptly, and in compliance with federal and state regulations.

Individuals who believe they have been discriminated against based on race, color, religion, sex, national origin, age, disability, political affiliation or belief, citizenship, or participation in WIOA Title I-funded programs may file a formal complaint.

Complaints must be filed in writing within 180 days of the alleged discriminatory act. The complaint must contain the following:

- Complainant's name, address, and contact information
- Identity of the individual or entity responsible for the alleged discrimination
- A detailed description of the allegations (must provide enough information to determine jurisdiction and apparent merit)
- Signature of the complainant or their authorized representative

Complaints may be submitted to the WMWDB Equal Opportunity (EO) Officer or directly to the Civil Rights Center (CRC) at the U.S. Department of Labor (DOL). If the local EO Officer determines that the complaint does not fall under local jurisdiction, the complainant will be notified in writing within 30 days and advised of their right to escalate the complaint to the CRC. Both the complainant and respondent have the right to legal representation. Investigations will follow strict confidentiality and due process to ensure a fair resolution. Complaints should be submitted using the CRC's Complaint Information and Privacy Act Consent Form.

Complaints and grievances unrelated to discrimination include general grievances such as:

- Program eligibility disputes
- Service denials
- Issues with AJC staff or services
- Employer-related concerns under WIOA-funded training or job placements
- Violations of labor standards, wages, or working conditions

Complaints must be submitted in writing within 90 days of the incident. The complaint should include:

- Complainant's name and contact information
- Details of the grievance, including relevant dates and individuals involved
- Requested resolution or corrective action

AJC staff will attempt to resolve the complaint informally within 15 days. If not resolved, the complaint is escalated to the WMWDB Grievance Officer for a formal review. An official investigation and hearing will be conducted within 30 days. The Board will issue a written decision within 60 days of receiving the complaint. If the complainant is dissatisfied, they may appeal to the Maryland Department of Labor (MD Labor) or the U.S. Department of Labor (DOL).

When a WIOA violation is found, remedies may include:

- Suspension or termination of payments to non-compliant service providers.
- Barring employers from participating in WIOA-funded programs.
- Reinstatement of employment for wrongfully terminated workers.
- Payment of lost wages and benefits for affected participants.
- Implementation of corrective action plans to prevent future violations.
- Other relief as appropriate.

If an individual disagrees with the local decision, they may appeal to MD Labor within 10 days. If the state appeal does not resolve the issue, it can be escalated to the U.S. DOL Employment and Training Administration (ETA).

The Western Maryland Workforce Development Board upholds a transparent, accessible, and fair grievance process to protect the rights of all AJC customers, partners, and service providers. This structured complaint process ensures that all complaints—whether related to discrimination, program services, or labor standards—are investigated promptly and resolved equitably.

F. DESCRIBE HOW AN INDIVIDUAL CAN REQUEST ACCOMMODATION.

Individuals with disabilities, including those who are deaf, blind, or have other accessibility needs, may request auxiliary aids and services to ensure equal access to programs and services at the American Job Centers (AJCs) in Western Maryland.

Contact the Equal Opportunity (EO) Officer:

Kimberly McMurtrie
Western Maryland Consortium
Address: 33 W. Washington Street, Hagerstown, MD 21740
Email: kmcmurtrie@westmdcon.org
Phone: 301-791-3164

Accommodations Available include:

- Sign language interpreters for deaf or hard-of-hearing individuals. Braille, large print, or digital format materials for individuals with visual impairments. Assistive technology, such as screen readers and text-to-speech software. Physical accessibility support, including wheelchair-accessible stations.
- “I Speak” Cards are available at all AJCs to help identify the preferred language of LEP individuals. Phone interpretation services are used to provide real-time assistance in the individual's language.

These measures ensure that all job seekers, regardless of disability or language proficiency, have equal access to workforce development services in Western Maryland.

G. DESCRIBE YOUR BOARD'S POLICY ON PROVIDING AID, BENEFITS, SERVICES, TRAINING, AND EMPLOYMENT, INCLUDING ASSURANCE OF REASONABLE ACCOMMODATION FOR QUALIFIED INDIVIDUALS WITH DISABILITIES, UNLESS IT POSES UNDUE HARDSHIP.

The Western Maryland Workforce Development Board (WMWDB) is committed to ensuring equal access to aid, benefits, services, training, and employment for all individuals, including those with disabilities. In compliance with the Americans with Disabilities Act (ADA), Section 188 of WIOA, and 29 CFR Part 38, WMWDB ensures that qualified individuals with disabilities receive reasonable accommodations unless providing such accommodation would pose an undue hardship.

Employees, customers, and members of the public may request reasonable accommodation from the Equal Opportunity (EO) Officer or any staff member at an American Job Center (AJC).

Modifications to policies, practices, and procedures are made to ensure full participation of individuals with disabilities. The same selection process is used for all customers, including individuals with disabilities, in programs, training services, Individual Training Accounts (ITAs), and grant-funded projects. Programs are administered in the most integrated setting appropriate for individuals with disabilities.

Auxiliary aids and assistive technology are provided where necessary, including:

- Sign language interpreters
- Screen readers and text-to-speech software
- Braille, large print, and digital format materials

Architectural and program accessibility is ensured for individuals with disabilities, including wheelchair-accessible workstations and technology-enhanced resources. The Board maintains a list of agencies and local resources to assist individuals with disabilities, including:

- Interpreters for deaf individuals
- Financial capability services
- Medicaid Buy-in program guidance
- Housing and transportation access assistance

Collaboration with Work Incentives Planning and Assistance (WIPA) ensures jobseekers with disabilities understand how employment affects disability benefits. Customers are advised about Ticket to Work (TTW) and Employment Network (EN) services under the Social Security Act, which provide benefits planning for individuals receiving Supplemental Security Income (SSI) and Social Security Disability

Insurance (SSDI). Staff use varied assessment tools, strategies, and approaches to evaluate individual strengths, abilities, and support needs. Application and registration processes are modified, if needed, to ensure individuals with disabilities can fully participate in programs and services.

All WIOA partners have implemented policies to provide reasonable accommodations for qualified individuals with disabilities. Requests for reasonable accommodation are handled promptly and in compliance with federal and state regulations.

By ensuring full accessibility, effective communication, and reasonable accommodations, WMWDB guarantees that all job seekers, regardless of disability, receive equal access to workforce programs and employment opportunities.

H. DESCRIBE HOW YOUR BOARD WILL COMPLY WITH THE AMERICANS WITH DISABILITIES ACT, INCLUDING PROVIDING REASONABLE ACCOMMODATION FOR MATERIALS, TECHNOLOGY, AND FACILITY ACCESSIBILITY. ALSO, OUTLINE HOW STAFF WILL BE TRAINED AND SUPPORTED IN ADDRESSING THE NEEDS OF INDIVIDUALS WITH DISABILITIES.

The Western Maryland Workforce Development Board (WMWDB), in collaboration with One-Stop Partners and the One-Stop Operator, is committed to ensuring equal opportunity, non-discrimination, and universal access to American Job Centers (AJCs) and WIOA programs for individuals with disabilities.

ADA-Compliant Infrastructure:

- Push-button automatic doors for easy entry.
- Wheelchair-accessible computer stations in the resource area.
- Designated computer workstations for deaf and hard-of-hearing customers, equipped with assistive technology.
- Accessible restrooms and pathways are available throughout the facilities.

Braille, large print, and digital formats are available for individuals with visual impairments. Text-to-speech and screen-reader-compatible materials are provided. Hearing loop systems and captioning tools for individuals with hearing impairments. Screen readers, magnification software, and adjustable computer settings for visually impaired users. Sign language interpreters are available upon request.

Ongoing Disability Awareness and Sensitivity Training:

- Staff and partners receive regular training on ADA compliance, disability inclusion, and assistive technology.
- Cross-training sessions with the Division of Rehabilitation Services (DORS) ensure staff can provide tailored services to individuals with disabilities.

- Training includes effective communication strategies for serving individuals with cognitive, physical, sensory, and mental health disabilities.

WMWDB partners with DORS, disability advocacy groups, and community organizations to enhance staff expertise and improve service delivery. AJCs conduct periodic self-audits to ensure facilities, technology, and services remain fully accessible. Feedback from individuals with disabilities is collected and reviewed to identify and address barriers. All reasonable accommodation requests are processed promptly to ensure that individuals receive timely access to services.

Through comprehensive facility modifications, assistive technology, staff training, and community collaboration, WMWDB ensures full compliance with the ADA and meaningful access to workforce programs for individuals with disabilities.

I. DESCRIBE YOUR BOARD'S POLICY AND STRATEGY TO ENSURE EFFECTIVE COMMUNICATION WITH INDIVIDUALS WITH DISABILITIES, INCLUDING THOSE WITH VISUAL OR HEARING IMPAIRMENTS, EQUAL TO THAT WITH OTHERS.

The Western Maryland Workforce Development Board (WMWDB) is committed to ensuring equal access to communication for individuals with disabilities, including those who are deaf, hard of hearing, blind, or have other sensory or manual impairments. The Board follows ADA, WIOA Section 188, and 29 CFR Part 38 to ensure that all individuals can fully participate in services, activities, and programs without communication barriers.

Auxiliary aids and services are available, and instructions for requesting accommodations are clearly stated in:

- Notices on official WMWDB letterhead
- Email signatures of staff
- Public postings at American Job Centers (AJCs)

Individuals who require communication assistance can consult with AJC staff to determine the most effective accommodations based on their needs. The Equal Opportunity (EO) Officer ensures qualified sign language interpreters are available for individuals who use sign language as their primary form of communication. WMWDB partners with Deafnet to provide certified sign language interpreters. Only professional interpreters are used to ensure confidentiality and accuracy. Relay Services for TTY Users **Dial 711 or 800-735-2258 for external telephone communication via Telecommunication Relay Services (TRS).**

Staff will read aloud and explain important documents, including benefits, waivers, and consent forms. Staff will assist with holding and turning pages for individuals who have difficulty manipulating printed materials. Computer-aided transcription services, screen readers, and speakerphones are available to facilitate communication. Staff utilize the U.S. Department of Labor's Limited English Proficiency (LEP) Toolkit for guidance. Translation services and bilingual staff are available to assist LEP individuals. Staff receive ongoing training on disability awareness, assistive technology, and effective communication

techniques. WMWDB regularly evaluates the effectiveness of its communication accommodations and seeks feedback from individuals with disabilities.

By implementing these strategies, WMWDB ensures that individuals with disabilities have communication access that is equal to that of others, empowering them to fully participate in workforce programs and services.

J. DESCRIBE HOW YOUR BOARD WILL MEET THE LANGUAGE NEEDS OF INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY WHO SEEK SERVICES OR INFORMATION. INCLUDE HOW YOUR BOARD WILL DISSEMINATE INFORMATION TO INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY, INCLUDING USING ORAL INTERPRETATION AND WRITTEN TRANSLATION SERVICES. (SEE THE MARYLAND ANTI-DISCRIMINATION LAW, INCLUDING 5 MD. STATE GOVERNMENT CODE ANN. §10-1101)

The Western Maryland Workforce Development Board (WMWDB) is committed to ensuring that all individuals, including those with Limited English Proficiency (LEP), have equal access to American Job Center (AJC) services, information, and programs. The Board adheres to Maryland Anti-Discrimination Law (5 MD. STATE GOVERNMENT Code Ann. §10-1101) and follows the Maryland Department of Labor's Nondiscrimination Plan and Language Access Plan to eliminate language barriers.

"I Speak" Cards & Language Line Posters are displayed throughout AJCs to assist individuals in identifying their preferred language from 38 languages. AJC staff use language identification flashcards to communicate with LEP customers efficiently. Ad Astra, Inc. provides foreign language interpreters through the State of Maryland's contract. Three AJC staff members are fluent in Spanish and available for walk-in customers. Language Line Services are available on-demand for walk-in or scheduled appointments. Staff can access real-time interpretation with little or no advance notice.

Critical workforce documents are translated into Spanish and other high-demand languages, including:

- "Equal Opportunity is the Law" Notice
- Grievance Policy and Procedure (last updated 09/25/2019)

Additional materials will be translated based on demand and community needs.

The Equal Opportunity (EO) Officer ensures language access procedures are properly followed and regularly updated. AJC staff receive training on language access policies, cultural competency, and effective communication with LEP individuals. WMWDB collaborates with partners, advocacy groups, and community organizations to ensure comprehensive language support.

By implementing multilingual resources, providing in-person and phone interpretation, and ensuring written materials are available in high-demand languages, WMWDB guarantees meaningful access to all workforce services for LEP individuals.

SECTION 16: FISCAL, PERFORMANCE, AND OTHER FUNCTIONS

A. PROVIDE AN IDENTIFICATION OF THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS AS DETERMINED BY THE CHIEF ELECTED OFFICIAL OR THE GOVERNOR. (WIOA SECTION 107(D)(12)(B)(I)(III) AND SECTION 107(D)(12)(B)(I))

As Chief Local Elected Official (CLEO), the Washington County Executive has designated the Workforce Services Department as its Fiscal Agent, authorized to manage funds on behalf of the CLEO. The Western Maryland Consortium administers all WIOA Title I grant funds in Allegany, Garrett, and Washington Counties. In addition, the WMC disburses and manages the WIOA Title I Grant Funds for Adult, Dislocated Worker, and Youth.

The dependence of all WIOA Partners on the federal budget process, federal budget funding levels, and allocation methodologies results in a level of risk for the sustainability of the American Job Centers. The allocation formula(s), implemented by WIOA Law, are a driving factor in the sustainability of the American Job Centers in that the formula allocates funding based on local economic conditions. The event funding levels change for the Western Maryland Consortium will burden Title I Adult, Dislocated Worker, and Youth funding. As a result, it may be necessary to adjust the budgets, serve fewer individuals, and offer fewer training expenditures and fewer opportunities for supportive services.

Western Maryland Consortium and the Local Board will be pursuing various grants to diversify funding.

B. DESCRIBE THE FINANCIAL SUSTAINABILITY OF THE AJC SERVICES WITH CURRENT FUNDING LEVELS, AND A DESCRIPTION OF THE ABILITY TO ADJUST SHOULD FUNDING LEVELS CHANGE.

The allocation formula(s) implemented by the Governor are a driving factor in the sustainability of the American Job Center(s). The formula allocates funding based on local economic conditions. Therefore, WIOA partner and Board evaluation will include an analysis of factors, including but not limited to:

- Reduction in days of services, reduction in lease costs, reallocation of the expenses among AJC partners, fund transfer requests, and co-location with other entities to reduce costs.
- The dependence of all WIOA Partners on the federal budget process, federal budget funding levels, and allocation methodologies results in a level of risk for the sustainability of the American Job Centers.

To adjust costs in the event that funding levels change, WIOA partner and Board evaluation will include an analysis of factors including but not limited to reduction in days of services, reduction in lease costs, reallocation of the expenses among AJC partners, fund transfer requests, and co location with other entities to reduce costs. Western Maryland Consortium and the Local Board will be pursuing various grants to diversify funding.

C. DESCRIBE THE COMPETITIVE PROCESS USED TO AWARD THE SUBGRANTS AND CONTRACTS IN YOUR AREA FOR ACTIVITIES CARRIED OUT UNDER THIS TITLE, INCLUDING RISK ASSESSMENT OF POTENTIAL SUBGRANTEES AND CONTRACTORS.

The Western Maryland Consortium has been designated as the fiscal agent for grant funds by all required elected officials as described in Section 107(d)(12)(B)(i)(III) of WIOA. WMC is committed to responsible fiscal practices and will comply with fiscal and administrative requirements as mandated by WIOA.

WMC is committed to following all federal, state, and local procurement policies and processes. WMC has established procurement policies and procedures, which the board has approved. Services are announced for bid or proposal and evaluated by an independent team of either staff, board members, or community members based on procurement thresholds. Contracts are awarded based on pre-established qualifications and scoring protocols. A competitive process will be used in accordance with guidelines set forth in CFR 200.318-326 of the Uniform Guidance.

In addition, WMC will review the risks associated with a potential sub-grantee prior to making an award. Risk analysis tools could include:

- Potential conflicts of interest
- Financial stability
- Quality of management systems and ability to meet the management standards prescribed in this part.
- History of performance.
- Reports and findings from audits
- The Applicant's ability to effectively implement statutory, regulatory, or other requirements imposed

D. DESCRIBE YOUR STRATEGY TO BECOME OR REMAIN A HIGH-PERFORMING BOARD. DESCRIBE THE PROCESS USED BY YOUR BOARD TO REVIEW AND EVALUATE THE PERFORMANCE OF THE LOCAL AJC(S) AND THE ONE-STOP OPERATOR.

The Western Maryland Workforce Development Board (WMWDB) uses performance data and customer feedback as integral tools for continuous improvement and program accountability. Performance reports generated through the Maryland Workforce Exchange (MWE) and other state reporting systems are reviewed quarterly by the Executive Director and program management staff and annually by the full Board.

Each quarter, staff analyze key indicators such as credential attainment, measurable skill gains, employment rates, and participant demographics. These findings are shared with program operators, the One-Stop Operator (OSO), and partners to identify emerging trends or performance gaps. The Executive Director convenes review meetings with Title I program managers and AJC partners to discuss outcomes, best practices, and corrective actions.

Customer feedback is collected continuously through post-service surveys, workshop evaluations, and

focus groups at American Job Centers. Feedback is compiled and reviewed alongside quarterly performance reports to identify service delivery improvements and professional development needs.

Findings from both data analysis and customer input are used to guide program modifications, training priorities, and policy updates, ensuring alignment with performance goals and WIOA accountability measures.

E. DESCRIBE YOUR AREA'S INDIVIDUAL TRAINING ACCOUNT POLICY. INCLUDE INFORMATION SUCH AS THE SELECTION PROCESS, DOLLAR LIMITS, AND DURATION. (WIOA SECTION 101(D)(6))

Western Maryland clients who are seeking training assistance through the utilization of WIOA Title I funds will be allowed to choose training courses approved by the state's Eligible Training Provider List (ETPL). There are several exemptions to this policy that are supported and approved by the Board:

Individuals have choices in deciding the training program that best fits their needs. The organization that will provide the services, Staff at the AJCs will ensure that individuals have access to the "State List of Occupational Training Providers" and information about how well these training providers performed. In addition, the WMC will promote customer choice with the assistance of professional career counseling staff.

The ITA will cover the costs of tuition and fees for an approved training program offered by an approved occupational training provider. Limits on dollar amounts and time in training are contained in the ITA policy.

Individuals will be required to first apply for Pell Grants and other funding sources prior to determining the value of an ITA. In some cases, supplemental resources such as Pell Grants will be combined with WIOA funds to fully cover an approved training program's tuition and fee costs.

After a WIOA client is authorized by Title I staff to attend a training program with an eligible ITA provider, the Title I staff will provide the individual with a signed copy of a billing authorization form for the selected training program. The billing authorization form will include the total amount of costs for tuition and fees that the Western Maryland Consortium will pay. After receiving the billing authorization form, the training provider can submit a "Request for Payment" form to the Western Maryland Consortium, which sets forth all approved tuition and fees for the WIOA client. The Western Maryland Consortium shall make payments for proper charges for tuition and fees in a timely manner.

The tracking of ITA obligations and ITA payments will be managed at the Western Maryland Consortium Administrative Office. This obligation and expenditure information will be regularly disseminated to staff at the local AJC centers to ensure that up-to-date information is available to the customer services staff and clients.

ITAs are limited to a total cost of \$6,000 and two years of approved training. The Western Maryland Workforce Development Board will work to adopt a standalone local ITA Policy by Q1 of 2026. The same will be provided to the partners and published on our website. Including the policy ensures transparency for all partners, stakeholders, and the public, particularly those who may not have direct access to the Board's policy manual. The ITA Policy will establish local procedures for eligibility, funding caps, duration, and approval processes, consistent with WIOA and Maryland Department of Labor guidance.

F. DESCRIBE HOW TRAINING SERVICES WILL BE PROVIDED, INCLUDING THE COORDINATION OF TRAINING CONTRACTS WITH INDIVIDUAL TRAINING ACCOUNTS, AND HOW YOUR BOARD ENSURES INFORMED CUSTOMER CHOICE IN SELECTING TRAINING PROGRAMS, REGARDLESS OF THE SERVICE DELIVERY METHOD. (CHAPTER 3 OF SUBTITLE B, SECTION 134(C)(3)(G))

WESTERN MD'S LOCAL WORKFORCE PLAN

It uses the Maryland Workforce Exchange (MWE) program to track WIOA-funded activities and outcomes. The training services will be delivered to eligible clients to ensure clients' choice and are consistent with priority and/or demand industries and occupations in the region. Together, the client and the counselor determine the best training option for the client. For example, a contract for training services or classroom size training may include being timelier and cost-effective in certain circumstances. An example is if employers need specific skills, then contract or class-sized training may be delivered. Likewise,

If it is more effective to train a group than individuals, then a contract or class-sized training may be used.

Other training services clients may benefit from:

- On-The-Job Training (OJT)
- Incumbent worker training
- Transitional Training
- Internships and Work Experience

All contract training will be leveraged to build on client choice and responsiveness to the industry's needs

G. DESCRIBE HOW THE AJCS IS UTILIZING THE MARYLAND WORKFORCE EXCHANGE AS THE INTEGRATED, TECHNOLOGY ENABLED INTAKE AND CASE MANAGEMENT INFORMATION SYSTEM FOR PROGRAMS CARRIED OUT UNDER WIOA AND PROGRAMS CARRIED OUT BY AJC PARTNERS.

Maryland Workforce Exchange (MWE) is the labor exchange, case management, and performance accountability for Title I and Wagner Peyser staff.

Job seekers register in MWE and are encouraged to complete the online resume, job search, labor market information, education and training options, along career and workforce information. Staff completes the WIOA program enrollment applications, tracks services, and documents program participation through case notes.

Partners will also use the MWE as a tool to assist job seekers and businesses. Additionally, The Maryland Workforce Exchange (MWE) is the official data management system used by the WMWDB and all Title I staff to ensure compliance with state and federal documentation and reporting requirements. Staff record eligibility verification, case notes, service provision, and outcomes in MWE for all participants served under WIOA Title I programs. The system's built-in validation and audit functions provide a standardized platform for accurate, timely reporting and monitoring. MWE also generates local and state performance reports that inform quarterly and annual analysis, ensuring data integrity and full compliance with DWDAL reporting standards.

H. DESCRIBE YOUR BOARD'S PROCESS FOR CONDUCTING OVERSIGHT AND MONITORING OF ITS WIOA ACTIVITIES AND THOSE OF ITS SUBGRANTEE AND CONTRACTORS.

The Western Maryland Workforce Development Board (WMWDB) conducts comprehensive oversight and monitoring of all WIOA Title I programs to ensure compliance with federal, state, and local requirements. Oversight activities are guided by the Board's Monitoring and Oversight Policy, which outlines the process, frequency, and responsible entities for each component of program and fiscal monitoring.

Monitoring responsibilities are divided between the WMWDB Executive Director, fiscal agent, and

designated monitoring staff. Each subrecipient and partner organization receives a programmatic and fiscal review at least annually, with additional desk reviews conducted on a quarterly basis. These reviews assess performance outcomes, participant eligibility, allowable costs, financial management practices, and adherence to procurement and reporting requirements.

The monitoring process includes:

- Risk Assessment: Each subrecipient is evaluated annually using a risk matrix that considers factors such as prior monitoring results, staff turnover, fiscal controls, and reporting timeliness.
- Desk Reviews: Conducted quarterly to review participant files, expenditure reports, and performance data submitted through the Maryland Workforce Exchange (MWE) and other systems.
- Onsite Monitoring: Annual visits to subrecipients and partners to review documentation, observe operations, and conduct staff interviews.
- Reporting and Corrective Action: Findings are documented in written reports provided to the subrecipient within 30 days of review. Entities must submit corrective action plans within 45 days. Follow-up monitoring is conducted to verify resolution.
- Board Oversight: Summary monitoring results are presented to the WMWDB Executive Committee and the full Board at least annually to inform policy decisions and ensure accountability.

Monitoring of the One-Stop Operator (OSO) is conducted by the WMWDB Executive Director in coordination with the Executive Committee. Oversight is carried out annually, with additional desk reviews conducted quarterly to ensure compliance with contractual obligations and WIOA service standards.

Results of OSO monitoring are documented in a written report shared with the Executive Committee and presented to the full Board. Any findings requiring corrective action are addressed within 45 days, with follow-up verification conducted to ensure completion.

This systematic process ensures that all WIOA programs are administered efficiently, with timely corrective action and continuous improvement across the Western Maryland workforce system.

I. DESCRIBE YOUR BOARD'S POLICY AND PROCEDURES FOR SAFEGUARDING AND HANDLING PERSONALLY IDENTIFIABLE AND CONFIDENTIAL INFORMATION (EX., PHYSICAL AND ELECTRONIC FILES), INCLUDING THE INCIDENT RESPONSE PLAN FOR LOSS OF RECORDS.

Western Maryland Consortium makes every effort to protect personally identifiable information, including name, address, social security number, and other related data elements that indirectly lead to identification.

The Local Board complies with local government policy regarding PII and TEGL 39-11. It is the practice of the office to secure any PII in a locked storage area. Files and documentation beyond the retention date are shredded. Computers are password protected and quickly time out to prevent unauthorized access to PII. Western Maryland Policies & Procedures for Privacy and Data Security were written and in place on 06/01/2019.

Breaches of both physical and electronic data must be reported. Examples of warning signs that a breach has occurred include:

- Missing or changed files or documents;
- Signs of a break-in or attempted break-in in the office or cabinets;

- Device tampering;
- Locked user account;
- Fake messages, and
- Unusually slow device or internet.

During onboarding, each staff member receives a copy of the policy, which outlines requirements for secure handling, storage, and transmission of sensitive participant data. Staff must sign an acknowledgment of receipt and understanding, which is maintained in personnel files. Periodic training sessions and refresher workshops are conducted to reinforce compliance and raise awareness of cybersecurity best practices.

Staff must report any breach or suspected breach of PII to the Director. The Director must notify organizations (local, State, or vendor) as soon as possible and within three (3) business days if a breach occurs and notify the MD DOL DWDAL Manager of Monitoring and Compliance as soon as possible. The Director will follow MD DOL Policy Issuance 2019-4, Privacy Data Security. The Director must also notify the MD DOL DWDAL MWE System Administrator of any electronic breach that involves MWE.

- The notification should include the following information:
- The encrypted notifications should be brief and contain the following elements:
- A brief description of what happened, including the date(s) and time of the breach and its discovery;
- To the extent possible, a description of the types of PII and/or sensitive information involved in the breach (e.g., full name, social security number, date of birth, home address, account, disability code, etc.);
- What the agency and point of contact are doing, if anything, to investigate the breach, to mitigate losses, and to protect against any further breaches;
- The contact information for the organization experiencing the breach; and
- The Legal approval documentation for notifications to the affected customers and/or employees, advising them of steps to take to protect themselves from potential harm.

J. DESCRIBE YOUR BOARD'S PROCUREMENT SYSTEM, AND HOW YOU WILL ASSURE YOU'RE YOUR PROCEDURES MEET THE STANDARDS IN USDOL REGULATIONS INCLUDE DETAILS ON HOW YOUR BOARD WOULD AWARD EMERGENCY CONTRACTS WHEN CURRENT CONTRACTS HAVE BEEN ELIMINATED FOR JUST CAUSE. (SEE 29 CFR PART 95, PART 97, AND 2 CFR 200)

The Western Maryland Workforce Development Board (WMWDB) maintains a procurement system that complies with WIOA Section 184, 2 CFR Part 200, 29 CFR Parts 95 and 97, and all applicable State of Maryland and local government requirements. The system is established through the Board's Procurement Policy, which is reviewed and approved by the Board and incorporated into the Western Maryland Consortium's fiscal operating procedures.

Procurement is designed to promote full and open competition, ensure cost reasonableness, and prevent conflicts of interest. The Executive Committee serves as the designated procurement authority and may delegate purchasing authority to the Executive Director within approved budget parameters. All

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procurements are conducted using one of the following methods:

- Micro-purchases (under \$15,000): May be awarded without competitive quotations if the price is reasonable.
- Formal procurements (over \$300,000): Require issuance of a Request for Proposals (RFP), public notice, formal evaluation, and Board approval.

Procurement records are maintained to document the rationale for method selection, contractor selection, and basis for contract pricing. All procurement actions follow the Western Maryland Consortium Procurement Procedures Manual, which aligns with DWDAL's guidance and ensures compliance with Uniform Guidance procurement standards.

K. DESCRIBE YOUR PROCESS TO DOCUMENT AND DEMONSTRATE THAT THE ACQUISITION, MANAGEMENT, AND DISPOSITION OF PROPERTY ADHERE TO THE PROPERTY MANAGEMENT PROCEDURES. (USDOL REGULATIONS 29 CFR PART 97 AND 29 CFR PART 95.)

WMC adheres to the acquisition, management, and disposition of property as prescribed in the DOL Regulations outlined in 2 CFR Part 200. Therefore, a Policy was developed and put in place.

L. DESCRIBE YOUR POLICIES AND PROCEDURES FOR AVOIDING CONFLICTS OF INTEREST OR THE APPEARANCE OF SUCH CONFLICTS IN THE EXERCISE OF THEIR RESPONSIBILITIES, PARTICULARLY THOSE RELATED TO THE AWARDING OF CONTRACTS.

The Western Maryland Workforce Development Board (WMWDB) maintains and enforces a comprehensive Conflict of Interest Policy in accordance with WIOA Section 107(h) and 2 CFR 200.318(c)(1). This policy ensures that Board members, staff, and subrecipients conduct all business ethically and transparently, and avoid any activity or relationship that could create an actual or perceived conflict of interest.

The policy requires that Board members and staff disclose any financial or personal interest that may influence, or appear to influence, their decisions related to procurement, contracting, or policy-making. Individuals with a conflict of interest must recuse themselves from deliberations, scoring, or voting on matters that could result in personal or organizational benefit. Examples include, but are not limited to, participation in Request for Proposal (RFP) reviews where the individual's organization is a bidder, or discussions involving funding decisions that could affect an employer or entity with which the individual is affiliated.

The WMWDB Executive Committee oversees the administration of the policy and ensures compliance through periodic review and disclosure updates. The Conflict of Interest Policy is reviewed annually by the Board and reapproved as part of the annual organizational meeting or whenever significant changes to federal, state, or local regulations occur. All members are required to sign an acknowledgment form each year affirming receipt and understanding of the policy. Signed acknowledgments are maintained on file by the Board's administrative staff.

This annual review process ensures the policy remains current, consistent with regulatory guidance, and reflective of best practices in workforce system governance and accountability.

M. DESCRIBE YOUR BOARD OR FISCAL AGENT'S ACCOUNTING PROCEDURES, INCLUDING THE PROCEDURES USED IN PREPARING REPORTS TO THE STATE.

The Accounting procedures for Western Maryland are prepared in accordance with Generally Accepted Accounting Principles (GAAP). Western Maryland Consortium has QuickBooks to track and report actual costs against established cost categories (administration, training, etc.) Every funded activity requires a detailed budget and alignment with appropriate cost categories and account codes. The pre-approval of expenditures and effective monitoring of financial transactions, supporting documents, and

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records all aid in ensuring timely and accurate accounting reporting.

The Fiscal Reporting System - monthly receipts and expenditures report generated by QuickBooks is the basis for accruals recorded and reported to MDOL and others. Obligation Control System - initiates a planning cycle prior to the beginning of each program/fiscal year to plan for anticipated funding. This planning process allows for control of the total obligation level of each funding source. The obligation report is monitored and anticipated expenditure levels of each of its programs and grants to ensure that costs are in line with available funding. Review processes are put in place to monitor and control the level of obligations and subsequent expenditures.

All three counties utilize a Microsoft Excel-based format for tracking and compiling the Obligation Report. The information will be used to generate Requisitions for Cash Quarterly Status Reports, Final Closeout Reports, and any other ad hoc reports as needed.

N. LIST THE KEY STAFF WHO WILL BE WORKING WITH WIOA FUNDS.

Western Maryland Fiscal Administration is the primary key staff member who will be responsible for the recording and reporting. The Fiscal Manager, Fiscal Specialist, and the Executive Director.

O. DESCRIBE HOW YOUR BOARD'S (OR FISCAL AGENT'S) FINANCIAL SYSTEM WILL PERMIT TRACING OF FUNDS TO A LEVEL ADEQUATE TO ESTABLISH THAT FUNDS HAVE NOT BEEN USED IN VIOLATION OF WIOA STANDARDS OR USDOL REGULATIONS.

Western Maryland Consortium uses QuickBooks Enterprise Solutions: Nonprofit 18.0 to record and track the use of funds. This system is maintained by qualified fiscal staff. It is supplemented by manual and electronic (using Microsoft Office Suite) record-keeping, helping to assure that all financial transactions are executed, and all records are maintained according to relevant standards and can be traced back through internal systems.

All expenditures are reviewed and approved by both Executive and Fiscal staff to ensure they are appropriately categorized, are appropriately charged, and are allowable costs. An internal code (GL) assignment identifies the expenditure category and line of expenditure, and a secondary system (class) identifies the grant charged prior to data entry into the QuickBooks database. Items are entered into the accounting system by a fiscal staff and are subsequently reviewed for accuracy against invoices and approving documents after a second fiscal staff entry.

WMC maintains an adequate separation of duties and multiple levels of review per written fiscal policy. In addition, supporting documentation is maintained, allowing for tracking any transaction to its points of review and origin, establishing that no funds are used in violation of WIOA standards or USDOL regulations.

P. PROVIDE A DESCRIPTION OF THE FOLLOWING:

- **FISCAL REPORTING SYSTEM,**
- **OBLIGATION CONTROL SYSTEM,**
- **ITA PAYMENT SYSTEM,**
- **CHART OF ACCOUNT SYSTEM,**
- **ACCOUNTS PAYABLE SYSTEM,**
- **STAFF PAYROLL SYSTEM,**
- **PARTICIPANT PAYROLL SYSTEM, AND**
- **PARTICIPANT STIPEND PAYMENT SYSTEM.**

Fiscal Reporting - Management reports are prepared each month by each subsection of the grant, for each county, and then by total Consortium. These reports are reviewed by the Fiscal Director for

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accuracy and compared to the general ledger ad trial balance to ensure all expenses have been recorded to the proper cost classification, In addition, the required Quarterly State Financial reports are prepared from this report to enable a detailed audit trail to present.

Obligation control system -The Western Maryland Consortium accounting system identifies a revenue account for each funding source in addition to the expenses associated with each funding source, Each month, Management Reports, including Trial Balance and Income Statements, are prepared and reviewed to ensure against the over expenditure of any funding source. These reports are reconciled to the general ledger each month. In addition, each county office maintains a record of and produces a monthly report of ITA for all participants, which includes any accrued expense or liquidated obligation. This report is submitted to the Administrative office for review and reconciliation each month. The Executive Director reviews the trial balance and income statements each month.

ITA Payment System -After the required contracts have been completed, the Western Maryland Consortium will adhere to the payment policy of the respective vendor. This contractual agreement describes the roles and responsibilities of the training providers, including the ITA payment system. Any pre-payment is based on the terms of each individual training contract. The training providers are required to refund tuition and fees paid by WMC when a WIOA participant drops out of training. Payments will be processed with the regular weekly disbursement of accounts payable. The training providers will submit invoices referencing the WIOA participant, the training provided, and the contractual agreement. The award and payment of the Pell Grant funds must be accounted for the reported by the Training Provider to assure that WIOA funds are only used to supplement these award payments.

The Executive Director approves the contracts and agreements. And then, a copy is placed in each participant's file. Finally, all the information is tracked on an Excel spreadsheet.

Chart of Accounts System -

- Assets
- Liabilities
- Fund Balance
- Revenue
- Administration Expenses
- Program expenses, including but not limited to training expenses.

Accounts Payable System - Purchase Orders are issued and approved by the Fiscal Manager and Executive Director for purchases. Invoices are checked for accuracy, and the appropriate purchase order is attached. Vendor numbers are assigned, and the invoices are processed by-weekly in the central office through the computerized accounts payable program for payment.

Staff Payroll System - Employees are required to sign in every day or call in for an absence. Employees maintain and submit a daily attendance time report at the end of the bi-weekly payroll cycle. The county supervisor reviews the time records and submits them to the central office for additional processing. Each timesheet is totaled for administrative and/or program hours and benefit hours. Time distribution is entered in the computerized payroll program that generates all reports and paychecks. Employee checks/direct deposits are issued every two weeks, and the payroll taxes are deposited as required by federal and state regulations.

Participant Payroll System - Bi-Weekly time cards are issued to each worksite, and the Worksite Supervisor enters the Work Experience/Summer Youth time for each participant daily. The time cards are collected at the end of each pay period and checked by the counselor responsible for a worksite.

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The participant and the worksite supervisor sign time and attendance reports. Each county has a staff person assigned to review the timecards for accuracy and proper signatures. After this review, Summer Youth time cards are totaled, and individual participants totaled hours are transferred to a worksheet and sent to the central office for payroll processing. Work Experience timecards are sent directly to the primary office for processing. After processing, the checks are mailed directly to the participants from the central office. Payroll taxes are deposited as required.

Participant Stipend Payment System - The termination of Participant Stipend Payments had eliminated the processes previously used to provide document these payments. Payment for participant transportation is made directly to the vendor.

Q. DESCRIBE YOUR BOARD'S (OR FISCAL AGENT'S) CASH MANAGEMENT SYSTEM AND HOW YOU WILL ASSURE THAT NO EXCESS CASH WILL BE KEPT ON HAND, AND THAT PROCEDURES ARE IN PLACE TO MONITOR CASH.

All invoices are generally processed upon receipt for payment. All grant expenditures and staff payroll are reviewed on a monthly basis to determine a trend of the actual expense. This information, combined with the approximate known times of training vendor invoices, allows an accurate forecast of the immediate cash need of the Western Maryland Consortium. Based upon this information, cash is requisitioned weekly and then sent to MD DOL. The end of the fiscal year, holidays, and the summer youth program affect the requisition for cash.

R. DESCRIBE YOUR BOARD'S COST ALLOCATION PROCEDURES INCLUDING:

- **IDENTIFICATION OF DIFFERENT COST POOLS,**
- **DISTRIBUTION OF STAFF COSTS BETWEEN COST CATEGORIES (ADMINISTRATIVE COST, PROGRAM COST AND INDIRECT COST),**
- **DISTRIBUTION OF FUNDS FROM EACH COST POOL,**
- **DESCRIPTION OF FUNDS INCLUDED IN EACH COST POOL, AND**
- **DESCRIPTION OF COST ALLOCATION PLANS FOR AJCS.**

Allowable costs will be measured by the following:

- Reasonable and necessary to the grant award
- Conform to any limitations found in the Uniform Cost Principles or grant award.
- Consistent with policies and procedures that apply uniformly to all activities,
- In accordance with GAAP and the required OMB circulars

Cost are identified and directed as either:

Assigned Direct costs - Costs that benefit a single funding source and/or cost category will be directly charged to a subsection of the grant.

Unassigned Direct Costs - These are costs (both staff and operation) that cannot be directly charged to a specific funding source or cost category will be assigned to an intermediate Program Cost Pool (PCP) for accumulation and distribution, WMC will maintain adequate documentation to support the distribution of costs to the various funding sources and cost categories. The distribution of the cost pools will be based upon an acceptable cost allocation methodology. Examples of these costs include rent, equipment, insurance, and communications.

Indirect Costs - These are costs that cannot be directly charged to a subsection of the grant but are incurred for a common purpose benefiting more than one cost objective. These costs are usually administrative and are accumulated in an intermediate Administrative Cost Pool (ACP) for distribution. The distribution of the cost pools will be based upon an acceptable cost allocation methodology.

Staff Time Allocation - Staff performing administrative functions as defined in the WIOA regulations will be charged to Administration, except for documented time devoted to program/client services. Staff performing program services will be charged to the appropriate grant subsection based on the percentage of participants served that month from each funding stream. These times sheets will be given to the accounting department every two weeks (payroll cycle) to distribute payroll expenses.

Cost pooling involves accumulating costs to intermediate pools for later allocation to the final cost objectives. Program Cost Pools (PCP) consisting of both staff and operation costs will be distributed monthly by WMC. This pool will be distributed to the various WIOA (and other DOL administered) funding sources based upon program participant data. A monthly participant matrix is prepared monthly by MIS staff containing numbers of individuals for each program. The Program Cost Pool for the month is distributed to the grants based on the program participant data contained in this report.

Washington County Dropout Prevention Program will not be represented in the PCP participant numbers as most case management, instructional and overhead costs are paid through these subgrants. WMC staff time and related expenses incurred servicing these youth (eligibility determination, case management, MIS record keeping) will be directly charged to the category using time records.

Administrative costs will be accumulated in the Administrative Cost Pool (ACP) and are first distributed to the maximum allowed to non-DOL administered grants for services discrete from those provided under DOL administered grants. The remaining administrative costs are distributed over DOL Administered non WIOA grants proportionate to spending after all direct costs (direct assigned, indirect assigned, and staffing) have been assigned. WMC assures the method used to distribute cost from the pools to the various funding sources and cost categories will be reasonable and consistently applied.

Administrative costs under the Workforce Innovation and Opportunity Act (WIOA) are allocated in accordance with 2 CFR Part 200 Subpart E and the WMWDB Cost Allocation Plan.

Administrative expenses include costs related to Board governance, financial management, procurement, policy development, monitoring, and oversight activities necessary for program administration.

These costs are allocated to WIOA Title I grants based on proportionate benefit and the relative share of total direct program expenditures incurred by each funding stream. The allocation process uses a modified total direct cost (MTDC) methodology, wherein administrative costs are distributed monthly across the Adult, Dislocated Worker, and Youth cost pools based on each program's share of total direct costs. The fiscal agent performs and documents these allocations within the financial management system, ensuring transparency and consistency with federal cost principles.

Funds in Each Cost Pool- WIOA funds included in each cost pool are Youth funds, Adult funds, Dislocated Workers funds, Administrative funds, WIOA grant funds, Administrative funds, and other WIOA discretionary awards. Funds in each cost pool represent the WIOA Title I Adult, Dislocated Worker, and Youth funding streams, as well as any additional WIOA-related grant funds administered through the Maryland Department of Labor's Division of Workforce Development and Adult Learning (DWDAL). These funds include special allocations such as Rapid Response, Reemployment Services, or other discretionary WIOA grant awards provided to the local area.

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Each cost pool is managed separately to ensure that expenditures are accurately tracked, allowable, and properly allocated. Administrative and program costs are charged proportionally to the appropriate funding source in accordance with the approved Cost Allocation Plan. This structure ensures compliance with federal and state financial requirements and supports transparency in how funds are managed and reported.

Cost Allocation Plan for the American Job Center- For any co-location costs, the method of this allocation will be negotiated between and among the partners and the operator with the approval of the LWDB, Local Elected Officials, and the agencies which the various partners are accountable to ensure an equitable allocation.

S. DESCRIBE YOUR BOARD'S (OR FISCAL AGENT'S) PROCEDURE FOR COLLECTING DEBTS INVOLVING WIOA FUNDS.

The Local Board has given the Fiscal Staff of Western Maryland Consortium authority to collect debts on its behalf. Any reports of delinquency in recovering debts will be directed to the finance committee, who then reports them to the Board for legal action.