2024 - 2028

Anne Arundel County

Local Plan

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Executive Summary

The Anne Arundel County Local Workforce Development Board (the Board) oversees workforce development service implementation in Anne Arundel County, Maryland. The Board's vision is to have a high-performing workforce system that is robust, seamless, and equitable so that Anne Arundel County businesses have a pipeline of skilled workers, and all Anne Arundel County residents are connected to family-sustaining employment. In line with this vision, the Board has established four goals:

1. Increase the labor force participation in Anne Arundel County
2. Meet industry demand through innovative workforce solutions
3. Increase the number of Anne Arundel County residents enrolled in Registered Apprenticeship programs
4. Continuously improve the workforce system

To achieve the vision and goals, the Board has three standing committees which are charged with the development and oversight of strategies to meet this vision. The committees are the Governance Committee, the Alignment Committee, and the Business & Industry Engagement Committee. Short and long-term task forces are also created under the committees as needed for specific projects or areas of interest.

To develop the following Local Plan, the Board gathered feedback from businesses, county residents, and other stakeholders through a series of surveys. A survey was sent to businesses in the region to gather insights into the needs and future demands of the workforce. The survey received responses from 251 businesses representing a variety of industries with the top five being Hospitality/Retail (14%), IT/Cyber/Technology (12%), Healthcare (9%), Construction/Skilled Trades (6%), and Government (5%). The Board also surveyed local stakeholders including community-based organizations, education/training providers, faith-based organizations, and elected officials to gain perspective on the strengths, weaknesses, and efficiency of the Anne Arundel County Workforce System. A total of 18 responses were received and evaluated for this plan. Lastly, the Board conducted a survey of labor force participation in the fall of 2024 which gathered responses form 5,000 residents and provide insights on what residents prioritize when looking for employment, what caused them to leave the labor force during the pandemic, what is keeping residents from returning to the workforce, and what barriers to employment residents are facing. The results of the surveys along with labor market information, roundtable discussions, and partner insights have shaped the plan laid out here.

The Board embraces Maryland's Four Core Strategic Pillars, ensuring alignment with state-level goals and fostering regional economic prosperity.

1. Supercharging Key Sectors: The Board prioritizes high-demand industries in the county and region. Partnerships with local businesses, industry associations, and other partners allow the Board and workforce system to identify skill needs and develop innovative, demand-driven solutions to the talent needs in the region.
2. Advancing Equity: The Board is committed to equitable access to services for all county residents and businesses. Through targeted outreach and comprehensive wrap-around services the Board focuses on reducing disparities in access to training and employment opportunities.
3. Preparing the Future Workforce: The Board recognizes that to create a sustainable labor force, preparation for work must start early. . Through the work of the Board's Blueprint Task Force, collaboration to increase student participation in Registered Apprenticeships and completion of Industry Recognized credentials is coordinate between partners through Career Counseling implementation.
4. Improving System Alignment: The Board's Alignment Committee fosters system-wide collaboration through monthly committee meetings that include all system partners. The committee leads referral system creation, performance dashboard development, and customer feedback surveys across all partners to improve efficiency and effectiveness of the entire system.

The Board's commitment to these pillars is reflected in the ongoing and planned project of the Board and its committees and task forces.

Section 1 - Economic Analysis

Provide an analysis of regional economic conditions, including:

- **Existing and emerging in-demand sectors and occupations,**
- **The employment needs of businesses in those sectors and occupations; and**
- **How the LWDB compares to the region and any unique contributors to or differentiating factors from the regional economic conditions and business needs described in your Regional Plan.**
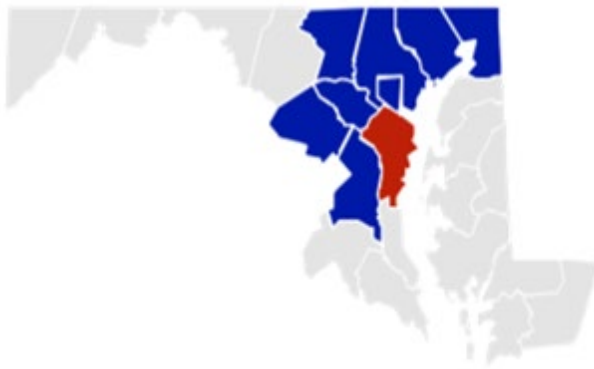
Anne Arundel County is located in a region that consists of Baltimore, Anne Arundel, Howard, Carroll, Hartford, and Cecil Counties and Baltimore City. However, being adjacent to Montgomery and Prince George's counties, Anne Arundel County is also considered to be a part of the larger Washington metropolitan area. Both regions are heavily represented by government organizations, their contractors, as well as healthcare and professional/scientific services.

The same industries represent the top industries in Anne Arundel County. The government industry is the largest employer in the County. The National Security Agency and Fort George G. Meade campuses and the companies and organizations that are located on those campuses and associated with its activities employ 47,091 people, 66% of which are civilian government employees and 34% are military (Maryland Department of Commerce). In fact, government jobs account for 28% of jobs in the county and represent approximately the same number of jobs as the next three largest industries (healthcare, retail trade, and accommodation and food service) combined (Lightcast). Additionally, being the capital of Maryland and housing many state government agencies, the City of Annapolis is one of the most important economic drivers and employment hubs in the County. Other economic drivers and employment hubs in the local area include the North County Industrial Zone, BWI Airport area, Arundel Mills, and two regional hospitals.

Largest Industries by Jobs

Industry	2018 Jobs	2023 Jobs	Nat. Avg. in 2023 Jobs
Government	93,404	96,177	49,781
Health Care and Social Assistance	32,581	34,021	45,200
Retail Trade	34,260	31,332	32,756
Professional, Scientific, and Technical Services	28,256	30,012	24,512

Accommodation and Food Services	29,350	29,701	28,874
Construction	20,261	22,044	20,021
Administrative and Support and Waste Management and Remediation Services	17,919	18,633	20,902
Manufacturing	12,287	18,347	26,653
Transportation and Warehousing	15,667	17,578	15,037
Other Services (except Public Administration)	15,236	13,983	17,185
Wholesale Trade	9,852	8,223	12,567
Finance and Insurance	7,030	6,654	14,126
Arts, Entertainment, and Recreation	8,001	5,420	6,144
Real Estate and Rental and Leasing	5,856	5,400	6,112
Educational Services	4,028	4,424	8,748

Source: Lightcast

The top industries by volume of jobs remain relatively stable in Anne Arundel County with the top five remaining the same over the past four years except for Professional, Scientific, and Technical Services overtaking Accommodation and Food Services as the fourth largest industry.

Top Growing Industries by Job Growth

Industry	2018 Jobs	2023 Jobs	Change in Jobs	% Change in Jobs
Manufacturing	12,287	18,347	6,060	49%
Government	93,404	96,177	2,773	3%
Transportation and Warehousing	15,667	17,578	1,911	12%
Construction	20,261	22,044	1,783	9%
Professional, Scientific, and Technical Services	28,256	30,012	1,756	6%
Health Care and Social Assistance	32,581	34,021	1,440	4%

Administrative and Support and Waste Management and Remediation Services	17,919	18,633	714	4%
Educational Services	4,028	4,424	396	10%
Accommodation and Food Services	29,350	29,701	351	1%

Source: Lightcast

While manufacturing continued to be the highest growth industry in the county, gaining 6,060 jobs, an increase of 49%, between 2018 and 2023 there has not been a corresponding increase in production-related-occupations. When looking at the job openings posted during 2024 most positions were concentrated in information technology and professional services occupations including software developer, computer systems engineers, network administrators, and managers.

Additionally, Government is the second largest growing industry in the county graining 2,773 jobs, an increase of 3%. When looking at the job openings posted during 2024 most positions were concentrated in information technology, professional services, and healthcare occupations including computer user support specialists, administrative assistances, personal care aides, and management analysts.

Key Sectors

When determining the industries for our system to focus on, we not only look at job numbers and projected growth, but we also look at the occupations within industries to understand which occupations offer job growth and family-sustaining wages. Based on the industry data, the Board decided to concentrate on industries that represent the most jobs and growth in the region and the local area. The identified key sectors are:

- Healthcare – healthcare, social assistance
- Information Technology/Cybersecurity/Professional Services – professional, scientific, technical services
- Transportation - transportation, warehousing, logistics
- Construction/Skilled Trades – construction, skilled trades
- Hospitality – accommodation and food services, arts, entertainment, and recreation, retail

These five industries represent 51% of total jobs and 42% of expected job growth. When taking into account that the occupations in the Government and Manufacturing industries in the area align with occupations within the identified industries

In addition to the jobs and growth represented by these industries, when looking at the growth and demand in the government and manufacturing industries the occupations and skills needed align with those of these top industries.

Direct input from local businesses

The Board surveys local businesses to gather insights directly from businesses to ensure the labor market information pulled for this plan aligned with what businesses are saying. Of those surveyed 65% of businesses said finding candidates with specialized/technical skills for the job

was moderately to very difficult. Additionally, 65% of businesses said that candidates slightly to moderately lack basic literacy skills.

Looking at the current talent pool, 60% of businesses surveyed said moderately or very often job applicants do not match the requirements of the job posting. Of those surveyed, 61% of businesses said finding candidates with the required industry certifications is moderate to very challenging. Additionally, 57% said fining skilled entry-level candidates was slight to moderately challenging while 54% said finding experienced mid-level candidates was moderate to very challenging.

When asked how challenging meeting the workforce needs in the next five years will be, 68% of businesses said it would be moderate or very challenging. This input shows that the county is facing a skills gap both in technical/specialized skills and soft skills throughout all industries.

Skills	Postings	% of Total Postings	Profiles	% of Total Profiles	Projected Skill Growth	Skill Growth Relative to Market
Project Management	5,982	9%	15,374	9%	+19.8%	Rapidly Growing
Computer Science	5,343	8%	721	0%	+26.8%	Rapidly Growing
Auditing	3,765	6%	4,603	3%	+21.8%	Rapidly Growing
Marketing	3,703	5%	13,211	8%	+23.0%	Rapidly Growing
Nursing	3,678	5%	1,408	1%	+20.1%	Rapidly Growing
Merchandising	3,609	5%	3,124	2%	+15.0%	Growing
Workflow Management	3,080	5%	1,708	1%	+18.0%	Growing
Python (Programming Language)	2,960	4%	1,467	1%	+24.5%	Rapidly Growing
Finance	2,850	4%	4,791	3%	+27.3%	Rapidly Growing
Accounting	2,815	4%	6,110	4%	+24.0%	Rapidly Growing
Data Analysis	2,811	4%	4,689	3%	+25.8%	Rapidly Growing
Systems Engineering	2,783	4%	4,346	3%	+20.9%	Rapidly Growing
Agile Methodology	2,572	4%	1,726	1%	+19.8%	Rapidly Growing
Selling Techniques	2,514	4%	3,128	2%	-1.2%	Lagging
Cyber Security	2,331	3%	2,070	1%	+14.2%	Growing
Process Improvement	2,318	3%	4,882	3%	+27.0%	Rapidly Growing
Automation	2,279	3%	1,629	1%	+30.5%	Rapidly Growing
Billing	2,248	3%	2,461	1%	+20.0%	Rapidly Growing
Information Systems	2,224	3%	1,720	1%	+21.6%	Rapidly Growing
Software Engineering	2,094	3%	2,133	1%	+23.1%	Rapidly Growing

1 Source: Lightcast

Specialized/Technical Skills In-Demand – Job Postings

When surveyed, 54% of local businesses said that technical skills were very to extremely important when evaluating candidates. When looking at the demand for specialized/technical skills the most growth in skills related to information technology/cybersecurity and processional services occupations. The highest projected specialized/technical skill in-demand are for process improvement, automation, computer science, and data analysis with all having a project growth greater than 25%.

Common/Soft Skills In-Demand – Job Postings

When surveyed, 78% of local businesses said soft skills were very to extremely important. Looking at an analysis of the job postings in area, the growing soft skills that are needed are presentation, troubleshooting/problem solving, and organization skills. The demand for problem solving skills matches the survey results from businesses which showed that 62% of respondents found the gap in problem solving moderately or very significant.

Skills	Postings	% of Total Postings	Profiles	% of Total Profiles	Projected Skill Growth	Skill Growth Relative to Market
Communication	23,916	36%	13,177	8%	+3.6%	Lagging
Management	19,223	29%	24,459	14%	+5.3%	Stable
Customer Service	17,134	25%	26,970	16%	+5.2%	Stable
Operations	14,168	21%	17,213	10%	+8.1%	Stable
Leadership	13,012	19%	20,145	12%	+8.5%	Stable
Sales	10,376	15%	23,415	14%	+7.8%	Stable
Problem Solving	9,582	14%	3,856	2%	+11.3%	Growing
Detail Oriented	8,519	13%	1,227	1%	+7.1%	Stable
Planning	8,407	12%	6,452	4%	+10.9%	Growing
Writing	7,460	11%	4,590	3%	+11.8%	Growing
Microsoft Office	6,516	10%	17,421	10%	+18.5%	Growing
Coordinating	6,065	9%	4,629	3%	+14.7%	Growing
Microsoft Excel	5,970	9%	13,664	8%	+17.7%	Growing
Research	5,833	9%	15,257	9%	+17.2%	Growing
Interpersonal Communications	5,482	8%	1,368	1%	+12.5%	Growing
Troubleshooting (Problem Solving)	5,133	8%	4,366	3%	+19.0%	Growing
Organizational Skills	5,070	8%	1,282	1%	+14.3%	Growing
Presentations	4,743	7%	3,662	2%	+23.0%	Rapidly Growing
Verbal Communication Skills	4,440	7%	369	0%	+4.1%	Lagging
Lifting Ability	4,430	7%	38	0%	+10.6%	Growing

2 Source: Lightcast

Industry Certifications In-Demand – Job Postings

When examining the top qualification in-demand by local businesses it is not surprising to see various forms of Security Clearance levels to be in the top ten list. The influence of federal agencies including the National Security Agency, US Cyber Command, and DISA on the region can be seen in both federal and private sector employment requirements through government contract work. In addition to security clearance, a valid driver's license is also listed as the second most in-demand qualification in job postings. When looking closer as the industry certifications in-demand, certifications in healthcare and IT/cybersecurity occupations are prominent. The top industry certifications in-demand are Registered Nurse (RN), Cardiopulmonary Resuscitation (CPR) Certification/Basic Life Support (BLS) Certification, IAT Level II Certification, Certified Information Systems Security Professional, and Certified Nursing Assistant (CNA).

Section 2: Strategic Planning

Part I: Aligning to Maryland's Strategic Pillars

Describe the LWDB's strategic vision and goals for preparing an educated and skilled workforce, including youth and individuals with barriers to employment.

The Anne Arundel County Local Workforce Development Board's (the Board) vision is to have a high-performing workforce system that is robust, seamless, and equitable so that Anne Arundel County businesses have a pipeline of skilled workers, and all Anne Arundel County residents are connected to family-sustaining employment. In line with this vision, the Board has established four goals:

5. Increase the labor force participation in Anne Arundel County
6. Meet industry demand through innovative workforce solutions
7. Increase the number of Anne Arundel County residents enrolled in Registered Apprenticeship programs
8. Continuously improve the workforce system

To achieve the vision and goals, the Board has three standing committees which are charged with the development and oversight of strategies to meet this vision. Short and long-term task forces are also created under the committees as needed for specific projects or areas of interest.

The Governance Committee is responsible for ensuring the Board and the system partners are high-performing, meeting or exceeding all performance outcomes while remaining in compliance with federal, state, and local policies. The Governance Committee ensures all policies, procedures, and guidelines set by the Board are reviewed with an equity lens. The Governance Committee is also responsible for researching and developing new models and guidelines that will be created by the Board. An example of the current project is the creation of Good Quality Jobs standards and practices for Anne Arundel County.

The Alignment Committee is responsible for ensuring that system partners are aligned and work together to provide comprehensive, wrap-around services to all county residents. The committee also leads the outreach and awareness of the workforce system programs, services, and resources available especially to targeted populations and underserved communities. The Alignment Committee is currently working on a comprehensive referral system between partners which will allow all system staff to easily connect residents to all available services and resources.

The Business & Industry Engagement Committee is responsible for ensuring the Board and workforce system are aligned with and meeting the needs of local business and industry. The Business & Industry Engagement Committee leads the efforts in engaging businesses with the workforce system through outreach and awareness strategies. The Business & Industry Committee also identifies the most in-demand occupations and identifies the knowledge and skills needed for residents to secure employment. The committee also works with businesses to develop and implement strategies to increase recruitment, retention, and upskilling of talent, especially from diverse populations including youth and individuals with barriers to employment.

Describe how the LWDB will work with providers to facilitate the development of career pathways, including co-enrollment in core programs and academic training programs when appropriate.

In partnership with local businesses, education and training providers, and core program partners the Board is committed to developing career pathways that allow residents to move up to family-sustaining employment. This work is led by the Board's Business & Industry Engagement Committee through the Industry Collaboratives.

The development of career pathways not only includes mapping career advancement through occupational titles but also includes the education, training, and experience needed to move from one level to the next. The board will focus on mapping careers from entry-point to middle-skill positions that provide family-sustaining wages. It is the vision of the Board that these pathways will show the variety of paths an individual can take to move up within a career path including secondary education, occupational training, registered apprenticeship programs, and more. By mapping out the steps needed to move up in a career pathway, system partners can easily identify referral and co-enrollment opportunities for residents. The career pathway maps will be shared with all system partners through the Alignment Committee to align referral and co-enrollment processes.

Describe how does the local area's workforce development programs, including programs provided by partner agencies, support this strategic vision?
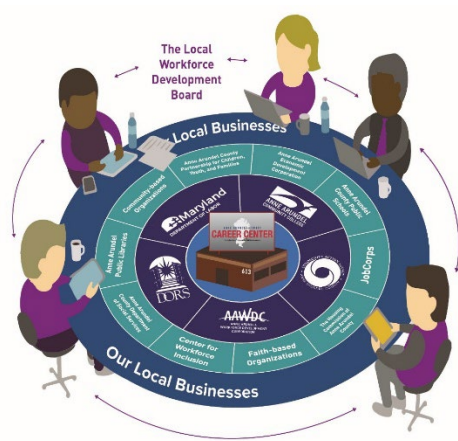
The Alignment Committee engages all workforce system partners, not just core program partners, to ensure the entire system is coordinated and working towards the shared vision of the Board. Through comprehensive understanding of each partner's role and services in the system, the Board is able to ensure the system is efficient and effective in address the pain points, needs, and barriers of businesses and residents in Anne Arundel County. The Alignment Committee also brings together system partners to collaborate on the development of innovative strategies and solutions to new challenges that arise in the County.

Partner	Role
Anne Arundel Workforce Development Corporation (AAWDC),	Adult, Dislocated Workers, Youth services including case management, job placement, barrier removal, occupational training, work-and-learn, individualized employment plans, mentorship for youth, internships, career exploration, career pathway development, career mapping, connection to business, business outreach, hiring events, manage industry collaboratives, training development, business-led job seeker services, consultative services for businesses, labor market and economic analysis
Maryland Department of Labor	Basic career services and business services. Including: job-readiness workshops, intake, assessment, referrals, hiring events, job fairs, business outreach, and the provision of labor market information

Anne Arundel Community College, Anne Arundel County Public Schools	Career and technical education programs at the post-secondary level, high school diploma/GED. AACPS is not a WIOA Title II provider, but partners on various educational initiatives for youth.
Division of Rehabilitation Services	Individualized Plan for Employment (IPE), assessment, career counseling, college or career training to prepare for employment, skills training leading to credentials, job search and job placement activities, job development, coaching, and supported employment services, assistive technology solutions for disability related needs, and Pre-Employment Transition Services for students with disabilities.
Center for Workforce Inclusion	Job-readiness training, occupational training, employment services, supportive services, for low income and unemployed people 55 and older
Anne Arundel County Public Schools, Anne Arundel Community College	K-12 Career and Technical education at the secondary level
Maryland Department of Labor	Support services, training, case management, job search assistance, relocation allowances, employment services wage subsidies, and income support
Maryland Department of Labor	Employment , training, and case management services for veterans with significant barriers to employment, and eligible spouses
Anne Arundel County Community Action Agency	Community Block grant administrator, supportive services provider, career exploration, job readiness workshops, summer youth jobs program, supportive services and outreach, Early Head-Start preschool, energy assistance, housing assistance, Health and Wellness Initiative, re-entry program including: occupational training, workforce readiness, and case management
The Housing Commission of Anne Arundel County	Supportive services, housing assistance, Career Connection partner
Anne Arundel County Department of Social Services	Individualized employment plan, case management, supportive services, barriers removal, job placement, job readiness, vocational training.
Maryland Department of Labor	Re-employment Services and Eligibility Workshop and Re-employment opportunity Workshop
Woodland Job Corps Center	Job-readiness services and vocational training for youth
AAWDC, MDOL	AAWDC and MDOL do pre-release work for career readiness and occupational training at county and state facilities; career development, education, job-readiness, hiring events for ex-offender friendly employers, record expungement.

In addition to WIOA required programs, the Board partners with other community organizations and coordinates services to better serve Anne Arundel County residents and businesses.

Other System Partners	Services
Anne Arundel Economic Development Corporation	Business Engagement, market research for businesses, labor market data, industry data, business financing and tax credits, site selection assistance, short-term office space, workforce training grants, business advisory boards, business consulting
Anne Arundel County Partnership for Children, Youth, and Families (Local Management Board)	Service delivery system for children, youth, and families. Provides: prevention services; mental health; school completion; outcome; measure and evaluation; and community resourcing.
Community and Faith-based organizations	Outreach, community engagement, and supportive services
Anne Arundel County Public Schools	K-12 Education, career pathways, career exploration

Describe how the local area will ensure consistent implementation of activities and services that align with the State's four core strategic pillars. (Refer to the Statewide plan for detailed description of the Four Core Strategic Pillars)

1. Supercharge Key Sectors

- *What strategies will the LWDB use to map skills and training assets and identify gaps?*

To support the growth of Anne Arundel County, the Board uses labor market data to identify key industry sectors within the area that have the most employment needs and projected demand. The Board has identified five key industries which are healthcare, information technology/cybersecurity, transportation/warehousing, construction/skilled trades, and hospitality. Through Industry Collaboratives, the Board leverages labor market data and business insights within the key sectors to identify pain points, map in-demand skills and certification, and identify training needs for occupations. The Collaboratives work with system partners and training providers to identify, develop, and catalog training assets that meet the needs identified.

2. Advance Equity and Access

- *What steps will the LWDB take to apply an equity lens to address labor force participation inequities and gaps?*
- *How will you expand access to supportive services for job seekers facing barriers to employment and/or training?*
- *What initiatives will the LWDB implement to support employers in recruiting, hiring, retaining, and upskilling employees from diverse populations?*

Having an equitable workforce system is a major part of the Board's vision, ensuring all county residents, regardless of background, can access and benefit from workforce programs and services. Through the work of the Alignment and Governance Committees, the Board leverages disaggregated data to identify disparities in labor force participation and utilization of workforce services. As identified, the Board and system develop targeted outreach strategies to increase the engagement of underserved populations including minority groups, women, and individuals with disabilities.

The Board in partnership with the Career Center workgroup has created the Career Center Specialist position which will serve as a navigator and connection maker for residents navigating the programs, services, and resources available within the local area. This position not only works with workforce system partners, but also community and faith-based organizations within the area who provide wrap around and supportive services that help residents succeed in training and/or employment. A comprehensive guide of resources available in the county will be developed and published to allow easier navigation of resources for system partners and residents.

The Board will develop innovative services to support employers in recruiting, hiring, retaining, and upskilling employees from diverse populations. The Board will conduct targeted outreach to engage businesses within the region. Educational materials will be made and educational events held to increase awareness of the value diverse populations bring to the workforce, dispel myths that exits about certain populations, and promote any available supports and incentives that businesses can access to support diverse populations.

The Board will continue to do targeted recruitment and hiring events. Some events will be for targeted populations such as justice-impacted individuals, veterans, and individuals with disabilities which will provide businesses an opportunity to connect with diverse candidates. Additionally, the Board will also host general hiring and recruitment events where partners will ensure that a diverse group of job seekers are in attendance.

3. *Prepare the Future Workforce*
   - *What strategies will the local area implement to increase participation in Registered Apprenticeships (RA) and the attainment of industry-recognized credentials among high school students?*

The Board has created the Blueprint Task Force under the Governance Committee, which provides guidance and advisement on behalf of the Board on how Anne Arundel County will increase participation in Registered Apprenticeship and the attainment of industry-recognized credentials among high school students in order to reach the goals of Blueprint for Maryland's Future and increase the career readiness of the future workforce.

The task force is made up of the core Blueprint Career Counseling partners Anne Arundel Workforce Development Corporation (AAWDC), Anne Arundel County Public Schools (AACPS), and Anne Arundel Community College (AACC) along with workforce system partners that provide youth services, community organizations that engaged with the public schools, and businesses. Bringing a variety of partners together allows for the development of a comprehensive and cohesive strategy across all partners to support a common vision of increasing participation in Registered Apprenticeship programs and attainment of industry-recognized credentials.

In addition to the task force, the Board is also developing a process which will streamline the Board's review and support of submissions for industry-recognized certifications to the state.

4. *Improve System Alignment and Accountability*
   - *How will the local area, working with the entities that carry out the core programs, align available resources to achieve the strategic vision and goals?*
   - *How will you monitor and evaluate the use of resources to ensure they are contributing to the desired outcomes?*

The Board's Alignment Committee leads the charge in convening and coordinating all workforce system partners, including core partners. The Committee creates and maintains a comprehensive list of services and resources provided by all system partners which is updated yearly to allow for partners to ensure programs and services are aligned not only with each other but with the strategic vision of the Board.

The One Stop Operator, under the guidance of the Alignment Committee, is responsible for professional development training of system staff which includes ensuring system staff are knowledgeable of the services and resources provided by all partners. These training sessions often include presentations for partners and case studies to allow staff to practice engaging all the appropriate partners to support clients.

The Alignment Committee is currently working on a workforce system dashboard. The dashboard will incorporate metrics from all local workforce system members which will increase the tracking of outcomes and impact of the entire system. The dashboard will allow

Part II: Sector Strategies for Emerging and In-Demand Industries

Provide an analysis of the knowledge and skills needed to meet the needs of the businesses in the Local Area, including employment needs in in-demand industry sectors and occupations.

Anne Arundel County's economy is driven by a high concentration of government sector employment in addition to five in-demand industries: healthcare, information technology/cybersecurity, transportation/warehousing, construction/skilled trades, and hospitality (HITCH).

Healthcare - As the second largest industry in the county after government, healthcare and social assistance continue to play a key factor in the local economy. The industry provides a broad range of services that encompass a wide range of demands for occupations. The industry has an 11% projected growth rate from 2023 – 2028 with the highest occupational demand in registered nurses, physical therapists, medial assistance, mental health counselors, and nursing assistants.

Information Technology/Cybersecurity - A major driving factor in the local and state economy, IT and Cybersecurity, as part of the larger Professional, Scientific, and Technical Services industry is projected to grow 7% from 2023-2028. The industry is largely influenced by the National Security Agency and other government entities located at Ft. Meade. The top in-demand occupations include software developers, computer network architects, computer systems engineers/architects, network and computer systems administrations, and information security engineers.

Transportation/Warehousing/Logistics - Driven by BWI Airport and the proximity to the Port of Baltimore, the transportation and warehousing industry is projected to grow 10% from 2023 – 2028. While the industry was impacted by the Francis Scott Key Bridge Collapse in March 2024, the industry quickly recovered. The most in-demand occupations in this industry include CDL A drivers, CDL B drivers, laborers and freight material movers, and general and operations managers.

Construction/Skilled Trades – The county has a higher than national average concentration of construction and skilled trades employment and the industry is projected to grow 3% from 2023 – 2028. The industry is facing a labor concern soon with 48% of employees in the industry age 45+ and only 29.2% being age 34 or under. The most in-demand occupations in this industry include project/construction managers, HVAC mechanics and installers, sales representatives, plumbers, pipefitter and steamfitters, and maintenance and repair workers.

Hospitality – This industry was hit the hardest by the COVID-19 pandemic and still struggles in recovery however, the three industries that make up this sector in the county represent 19.1% of total employment in the county. Together these industries are projected to grow by 2% from 2023 – 2028 but that projected growth jumps to 6% when eliminating retail trade. The most in-

demand occupations in this industry include retail salespersons, food service managers, customer service representatives, and general/operations managers.

Through Industry Collaboratives under the Business & Industry Engagement Committee, the Board will continue to work with businesses in these industries to build a prepared and responsive talent pipeline.

Provide an analysis of the workforce in the Local Area, including current labor force employment (and unemployment) data and information on labor market trends, and the educational and skill levels of the workforce in the Local Area, including individuals with barriers to employment.

Anne Arundel County has over 597,000 residents and is projected to grow by over 13,500 residents over the next five years. The county has 347,154 jobs which grew 1.9% from 2018 to 2023 which is less than the national growth rate of 4.5%. Pairing with lower job growth, the labor force participation rate decreased from 71.9% to 68.8% during the same time period (Lightcast). The decrease in labor force participation is not unique to Anne Arundel County but has resulted in a shortage of candidates for open positions. Over the past year the number of open jobs has been higher than the number of residents seeking employment. This has resulted in labor shortages in key sectors across the county.

	Population
16+ Civilian Non-Institutionalized Population ❓	459,809
Not in Labor Force (16+) ❓	140,060
Labor Force ❓	319,749
Employed ❓	311,211
Unemployed ❓	8,538
Under 16, Military, and institutionalized Population	137,491

597,300
Population (2024)

Anne Arundel County has a higher than average level of college educated residents. Within the county, 25.4% of residents possess a Bachelor's Degree which is 4.2% above the national average and an additional 19.4% of residents have a Graduate Degree or Higher. When looking at projections for Anne Arundel County, this trend is expected to continue to the number of resident that have and Associate's Degree or higher expected to climb (Lightcast).
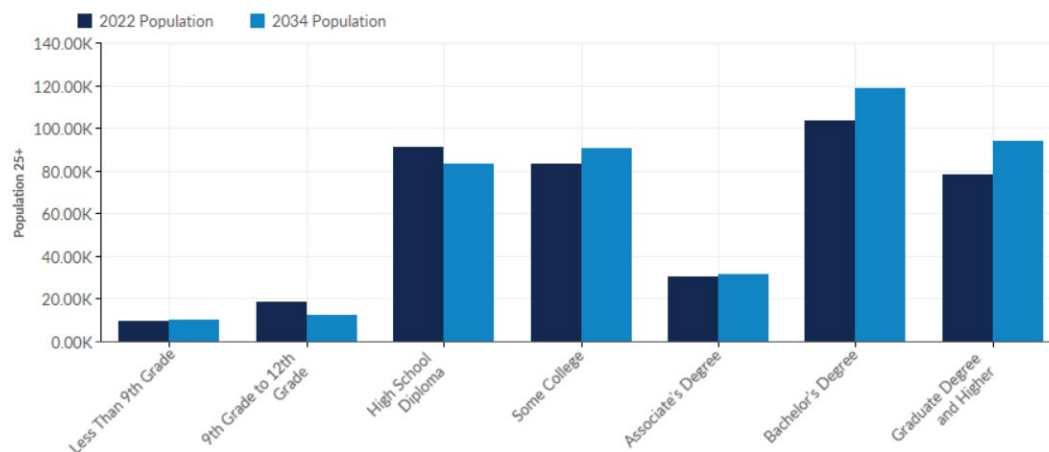
In addition to higher education levels, the county also had a higher than national average concentration of veterans with over 47,000 veterans compared to the national average of an area of this size being 30,335 (Lightcast). When looking at the retirement risk, Anne Arundel County is about national average with 175,666 residents 55 or over.

Currently unemployment in the area is below national and state averages with the areas Nov 2024 unemployment rate sitting at 2.8% compared to Maryland's 3.3% and the national rate of 4.2% (Maryland Department of Labor, Division of Workforce Development and Adult Learning). When looking at the ages of those unemployed, over half (51.03%) are between the age 25-44. The next largest group is 45-54 with 18.6% of unemployed (Lightcast). This range is typical with the concentration being within the major working ages. Unemployment by gender also show an almost even split with males being 50.84% of unemployed and females being 49.16% (Lightcast).

When examining unemployed by race, a stark difference between the breakdown of county residents and those unemployed becomes clear. Black or African American residents make up 20.2% of total residents but make up 56.04% of those unemployed. In comparison White residents make up 70.7% of the total county demographic but only 39.28% of those unemployed (US Census Bureau, Lightcast). Across other races and ethnicities, the comparison between county demographics and those unemployed are similar.

Provide an analysis of the workforce development activities (including education and training) in the Local Area, including an analysis of the strengths and weaknesses of such services, and the capacity to provide such services, to address the identified education and skill needs of the workforce and the employment needs of employers in the Local Area.

The Board surveyed community partners including community-based organizations, education providers, social service organizations, faith-based organizations, youth services providers, training providers, and government agencies to gather insights on the strengths and weaknesses of the workforce system along with feedback on the needs of the region.

As part of the survey, respondents were asked to rate the quality and/or availability of career development and job training/educational opportunities in the area. While all aspects were rated on average above "good", there are still room for improvement especially in the accessibility of the workforce system and the availability of job training and educational opportunities.

When asked about the strengths of the workforce system respondents provided a variety of options including training availability/development, on the job training options, and partnerships with key organizations. When asked about the weaknesses and areas of opportunity of the workforce system respondents cited increased need in targeted outreach, increasing accessibility of services due to transportation issues, increasing expertise in serving specific targeted populations, and lack of adequate staffing to fully address the area's needs.

Overall, the survey was insightful and reinforced the Board's efforts to increase system-wide outreach and awareness, build additional partnership and resources to address barriers to services and employment such as transportation, and increase occupational training options that align to industry need.

Describe how your area will align workforce programs, services, and resources to a career pathways model.

- **How will you identify and focus on sectors such as cybersecurity, healthcare, clean energy, infrastructure, and manufacturing?**

- **How will you engage with employers to understand their workforce needs and priorities?**

- **What strategies will you use to collaborate with partners to recruit successful training and apprenticeship program training providers to the ETPL?**

- **What strategies will you use to encourage employers to participate in workforce development initiatives?**

- **How will you support employers in developing and implementing on-the-job training programs?**

Through the work of the Business & Industry Engagement Committee, the Board convenes Industry Collaboratives in the identified high-demand industries within the County to identify, discuss, and develop innovative solutions to growing shortage of skilled talent. Industry Collaboratives are a strategic partnership between businesses and workforce development partners to build a skills talent pipeline. Collaboratives are formed to address the urgent need in the region for vetted, skills talent in the high-growth, high-demand industries.

Industry Collaboratives are made up of business representatives from the target industry or sub-industry, industry associations/groups, and workforce partners. The businesses lead the Collaborative, and the workforce partners provide support and implement the projects outlined by the Collaborative. Each Collaborative is chaired by a business member from the industry or sub-industry who not only manages the Collaborative and leads Collaborative meetings but also leads the efforts to recruit additional businesses to participate in the Collaborative. Having the businesses engage and recruit additional businesses to participate, the Board has seen a greater increase in business engagement in these discussions than when the workforce system partners were solely responsible for engaging new businesses.

Collaboratives use labor market data and business insights to determine the industry pain points that the collaborative wants to address. Next, the Collaborative members work together to develop and implement customized solutions to address the pain points across the industry. Examples of pain points addressed include:

- Industry Awareness – Collaborative members work together to increase awareness of the opportunities and career pathways in their industry. As part of this process businesses verify published labor market data and provide insights into the industry. Projects include industry awareness videos, industry career booklets, and panel discussions for interested candidates.
- New Talent Development – Collaborative members identify the most in-demand occupations and develop training programs that give candidates the essential skills, occupational skills, certifications, and/or hands-on experience needed to fill the demand. Project include occupational training, work and learn/on-the-job development, essential skills training, and Registered Apprenticeship Program development.
- Upskilling Current Talent – Collaborative members develop career pathways for key occupations and create training programs to move current talent up the career ladder to fill higher-skilled positions. Projects include career pathway development, incumbent worker training, and Registered Apprenticeship Program development.

Section 3: American Job Center Delivery System

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.

A goal of the Anne Arundel County Local Workforce Board (the Board) is that partners of the Anne Arundel County Workforce Development System operate an aligned and comprehensive workforce development system that has a unified presence in the County and provides seamless service delivery for residents and businesses.

Anne Arundel Workforce Development Corporation (AAWDC) is the county's authorized Workforce Administrator, pursuant to Title 14 of the Anne Arundel County Code. The selection of Career Centers will be made by the AAWDC President/CEO in conjunction with and approval by the Board. Anne Arundel County has two types of centers that are a part of the AJC network.

- Comprehensive – full customer and client services where all core partners are co-located;
- Satellite Centers – full-service centers or those that focus on targeted populations or business customers. These centers do not have representatives of all the core partners;

In addition, increased access to the AJC network is available through County Career Access points. These access points provide job search and job readiness services to clients as well as connection to the all workforce system partners and are in the community.

Anne Arundel County American Job Center Network	
Comprehensive Center	
Anne Arundel Career Center 613 Global Way, Linthicum Heights, MD 21090, 410-424-3240	
Satellite Centers	
Business Solutions Center @ BWI Marshall Airport BWI Workforce and Commuter Resource Center BWI Airport, MD 21240, 410-684-6838	**Ft. Meade Outreach Center** Building 4432 Ft. Meade, MD 20755, 410-674-5240
Community Access Points	
JobsWork! Arundel Annapolis 80 West Street, Suite C, Room 200, Annapolis, MD 21401, 410-269-4535	**JobsWork! Arundel Glen Burnie** 7500 Ritchie Highway, Suite 307 Glen Burnie, MD 21061, 410-421-8580
Division of Rehabilitation Services 49 Old Solomons Island Rd., #202 Annapolis, MD 21401	**Anne Arundel County Public Library** **16 locations throughout the County**

Describe your customer flow system and process used in the Local Area. Include eligibility assessment, individualized training plans, and case management.

The Board directs the planning and execution of a premier comprehensive workforce system where both customers (businesses) and clients (jobseekers) are able to seamlessly access workforce-related resources and support through multiple entry points within the County. The system is easy to use, and provides exceptional service delivery, ultimately meeting the customers' and clients' needs. The graph presented above shows that a client can access the system at any entry point where information about the services will be provided and they will be directed to a service at the location it is being delivered.

The County offers multiple *entry points* that include Community Access Points, community partners, and targeted outreach.

Community Access Points

Working closely with targeted communities in the county, the workforce system provides career-related information and resources for residents that are in closer proximity to these resources than to the Career Centers.

Community Access points include the Anne Arundel County Public Library Locations, the Division of Rehabilitation Services office, and the two JobsWork! Arundel centers. These centers aren't AJC network sites but are operated by community partners and offer job search and job-readiness services as well as referrals to the AJC network.

Community Access points are continually added as needed

Community Partners

Community Partners play a critical role in the community. Partners are able to provide services unique to a client's personal circumstances (i.e., mental health issues; substance abuse; GED tutoring; access to public assistance; housing). A referral process is being developed to ensure that clients experience a seamless transfer from one partner to another with minimal duplication of registration, eligibility, and documentation requirements.

Targeted Outreach

Utilizing outreach tools such as social media, community newspapers, local radio, and email campaigns, clients are informed about Career Center services such as workshops, business presentations, and hiring events. Individuals mandated by Unemployment Insurance (UI) receive communication inviting them to attend job readiness workshops in the Career Center and online in an effort to connect them to employment as quick as possible.

Service Delivery in the Anne Arundel County Workforce System (Anne Arundel Works)

The County's premier client flow provides the following Career Services experience:

Clients arrive at an Entry-point throughout the County or online. Upon entering, the client is greeted with friendly and knowledgeable staff who are responsible for gaining a better understanding of why the client is seeking services and what needs the client has. The Alignment Committee will develop a triage tool that easily and quickly allows staff to assess clients for what services are needed and identify what partner(s) to refer the client to in order to obtain the necessary services.

Below is a table describing the various services available through the workforce system and partners. No single client has the same needs and thus each individual receives a customized mix of these services.

Service	Description	Organizations

Intake and Orientation	Workforce system overview, introduction to services available, registration, basic assessments to determine eligibility.	MD Labor, DORS, AAWDC, AACC, CWI, AACCA, HCAAC, DSS, Job Corps
Assessment & Individualized Services	Assessment tools are used to determine suitability and eligibility. Barriers to training or employment are identified, and individuals are referred to a staff that caters to the individuals' needs. This may include career-specific assessments and includes the development of an Individualize Employment Plan (IEP).	AAWDC, MD Labor, DORS, AACC, SCSEP, DSS
Basic Services	A variety of services including resume review and writing, job search tools, interview preparation, as well as access to the public resource room computers, printers, and information resources such as labor market information and career opportunities.	AAWDC, MD Labor
Supportive Services	Services to help remove barriers to training and/or employment. They may be provided through the workforce system partners or community partners and vary from transportation, to child-care, to books or training supplies, to uniforms, and more.	MD Labor, DORS, AAWDC, AACC, CWI, AACCA, HCAAC, DSS, Job Corps, AACPL, other CBOs
Job-readiness & Essential Workplace Training	Training in the basic workplace attributes that exemplify a model employee such as timeliness, team approach, professional attire, and working in a multi-generational environment. Included is resume writing and interviewing skills.	AAWDC, MD Labor
Adult Basic Education	Includes literacy and numeracy skills, English Language learning, and high school diploma/GED attainment.	AACC
Occupational Training	Training focused on HITCH industries through cohort training or individual training accounts. Business are involved in assessment and curriculum review and development to increase likelihood of employment upon completion.	Facilitated by AAWDC, variety training providers who are on ETPL
Work-and-Learn	Includes hands-on training in a job role. It may be combined with classroom training, structures as an internship or fellowship model or as an on-the-job training securing employment post-training and sharing the cost of training between WIOA and the business.	AAWDC, DORS, CWI
Job Development & Employment Placement	Facilitated by a staff member working with employers to match jobs with jobseekers. An individual who does not need training may be referred directly to job development. Also works with individuals to customize resumes and prepare for interviews.	AAWDC, DORS, DSS, CWI, AACC
Follow-Up: retention & career progression	Periodic contact with business and clients to document the success of the job-placement and to ensure employment retention and career progression. Staff will help to address challenges or concerns the client may face in the workplace and charts benchmarks to track outcomes.	AAWDC, DORS, CWI, DSS

* Maryland Department of Labor (MD Labor); Division of Rehabilitation Services (DORS); Anne Arundel Workforce Development Corporation (AAWDC); Anne Arundel Community College (AACC), Center for Workforce Inclusion (CWI), Anne Arundel County Community Action Agency (AACCA), The Housing

Commission of Anne Arundel County (HCAAC), Anne Arundel Department of Social Services (DSS), Anne Arundel County Public Libraries (AACPL), Job Corps

Businesses as Workforce System Customers

The Board recognizes the need to provide exceptional services to businesses seeking skilled and qualified talent. To remain relevant to the business community, workforce system services must be tailored to meet their needs. The Business Services Team will serve businesses by:

1) Providing guidance in posting job announcements in the Maryland Workforce Exchange;

2) Assisting in identifying qualified candidates represented in the Maryland Workforce Exchange;

3) Engage businesses in presenting industry-related labor market information to clients;

4) Host hiring events that unite pre-screened, qualified clients with businesses with job openings;

5) Assist in upskilling the existing workforce through development and implementation of incumbent worker training.

Service Delivery at the Anne Arundel County Career Center, a partner of America's Job Center Network

As a subset of the Alignment Committee appointed by the Board, the Career Center workgroup consists of the co-located partners at the Anne Arundel County Career Center.

The Career Center Group meets regularly to ensure premier service delivery and operations of the Anne Arundel County Career Center.

Describe the process your Board uses for the solicitation and selection of the One Stop Operator. (Section 107 of WIOA)

Consistent with section 121(d) of WIOA, the Board, with the agreement of the Chief Elected Officials shall designate or certify One-Stop Operators and may terminate for cause the eligibility of the provider selected. Selection of the One-Stop Operator will be through a competitive process and shall be a public, private, nonprofit, or consortium of entities comprised of three (3) or more American Job Center partners. The selected One-Stop Operator will have demonstrated effectiveness and will be located in the local area. Examples of organizations that may competitively apply include institutions of higher education, employment service State Wagner-Peyser Act agencies, community-based organizations, nonprofit organizations, private-for-profit entities, government agencies, local chambers of commerce, business organizations, labor organizations, career and technical education schools, and other interested organizations or entities. Elementary schools and secondary schools shall not be eligible for designation or certification as a One-Stop Operator.

Organizations applying for One-Stop Operator designation must disclose any potential conflicts of interest arising from their relationships with other service providers. The selected One-Stop Operator(s) may not establish practices that create disincentives to providing services to individuals with barriers to employment who may require longer-term services, such as intensive employment, training and education services. And the selected One-Stop Operator(s) must comply with Federal regulations and procurement policies related to calculation and use of

profits. The Board will consider proposals that have direct costs associated with providing the One-Stop Operator roles and responsibilities, and proposals that have costs incorporated within other on-site service provider activities and no direct One-Stop Operator budget.

To ensure there is no conflict of interest or perceived conflict of interest, the Board may consider hiring an independent consultant to facilitate the procurement process. In this option, the Governance Committee of the Board will work directly with the independent consultant to develop a request for proposal and evaluation tool. No workforce system service provider or potential service provider will be involved in the development of the request for proposal or the selection process. In the event only one proposal is received, the Board will proceed with sole source procurement with the approval of the Chief Elected Officials. The One-Stop Operator activities are revised annually and procured as needed.

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.

The Board will utilize a pay-per-performance Request for Proposal (RFP) process when warranted. The selection of the vendors will be based on past performance of the vendor and assurance that their curriculum is in line with the needs of businesses. All providers will be required to participate in an initial onboarding process, which includes staff training, understanding of MWE, and paperwork requirements. In addition, regular (30-60-90 days) monitoring and reviews will be scheduled to determine whether the vendor meets the requirements of the program. Technical assistance will be provided during the entire implementation process.

The RFPs will be announced publicly and bidder's conferences will be held for interested vendors. The Proposal Review Committee, consisting of selected members of the Board, will review proposals and score them based on predetermined categories.

In addition, a Scorecard will be developed to include performance outcomes of each service provider and presented regularly to the Alignment Committee and the full Board to ensure continuous improvement.

Describe of how your Board will facilitate access to services provided through the AJC delivery system, including in remote areas, through the use of technology and through other means.

Diverse Service Delivery

The Anne Arundel County Workforce System will continue to provide services through a variety of delivery methods including online, hybrid, and in person that allow customers and clients to access services regardless of location in the County and barriers to services/employment. The system will continue utilizing technology such as the Board/system website (annearundelworks.com), online forms, email, and online virtual platforms to allow clients in remote locations or with barriers to physically access centers to receive services.

Much of the client flow process is now mirrored virtually including intake eligibility documents; access to the Maryland Workforce Exchange; online workshops and seminars on job readiness

topics, information sessions for training/services, industry introductions, and more. The system developed tools and processes that allow customers to get assessed and enrolled online to ensure that PII and other compliance rules are followed. Partners have also worked with training providers to ensure training that can be remote is offered online. Career coaching and Job Developemnt services are also offered virtually via phone or web-conferencing. Like all services provided by partners, online and hybrid services are continuously reviewed and improved to ensure ease of access and client success.

Outreach to All County Residents

Over the past few years, a focus of the Board's Alignment Committee has been to develop a joint communication strategy to ensure coordinated and unified outreach to the community and consistent information is available to the community about services available. As part of this work, the Alignment Committee developed the Anne Arundel Works brand for the workforce system. The creation of the brand allows the system to create unified outreach for the entire workforce system which increases awareness and decreases confusion form customer and clients. Additionally, the Board in partnership with the Alignment Committee launched a website to act as a central hub online for information about workforce services, connection to all system partners, and information about the Board. The website was launched but will continuously be updated and improved. Moving forward, the Alignment Committee will continue to build out on the joint communication strategy to reach all county residents but with a focus on underserved and in-need populations and communities.

In addition, the Board will continue to operate Career Access Points located in targeted communities as well as available through the Anne Arundel County Public Libraries which operate sixteen locations throughout the county. The Board's Community Outreach activities will ensure information and instructional activities are provided for individuals who are unable to physically access the Career Center.

Describe the roles and resource contributions of the AJC partners.

The description of partners' roles and responsibilities is located in the signed MOU to be provided to the State. The resource contributions are included in the Resource Sharing Agreement (RSA) to be provided to the State with the MOU. These documents are updated regularly to ensure accuracy.

Describe how your Board will use Individualized Training Accounts based on high demand, difficult to fill positions identified within local priority industries previously identified.

The Board will define how Individualized Training Accounts (ITAs) will be utilized as part of a larger training strategy as part of its local policy guidance (see Attachment 1 – Occupational Training Services). Currently, the ITA development and approval process is guided by the following guidelines:

WIOA Sec. 134(c)(3)(G)(iii) states that "[t]raining services provided under this paragraph shall be directly linked to an in-demand industry sector or occupation in the local area or the planning region." As such, the Board limits individual training to those industries and occupations that the Local Workforce Development Board deems in-demand. Those industries and occupations are identified on the documentation that clients received at intake.

The Board seeks to provide training opportunities within high-demand industries or occupations that aligns with the HITCH industries.

The Board sets a spending cap on an annual basis for the upcoming special year based on history, cost of training in the region, and the economic environment. In all cases, the Board seeks to provide high-value training solutions by operating cohort trainings in the most in-demand and popular occupations and industries in the local area.

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 Board ensures that the majority of participants in the WIOA Title I Adult program meet the definitions for veterans, low-income, public assistance, and/or basic skills deficiency.

1st Priority	Veterans and eligible spouses who are also low-income, recipients of public assistance and/or basic skills deficient
2nd Priority	Individuals who are not veterans or eligible spouses, are recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient
3rd Priority	Veterans and eligible spouses who did not meet "first priority" conditions
4th Priority	Additional priority populations established by the Governor, County Executive, or Local Workforce Development Board
5th Priority	All other individuals who qualify for the Adult Worker program

Other population categories that have barriers to employment will also have priority of service as identified by the Governor and the County Executive.

The Board developed a policy on priority of services that is guided by the principles outlined in the State Plan and provided in Attachment 2 – WIOA Adult and Dislocated Worker Priority of Service Policy.

Describe how your Board will train and equip staff to provide excellent, WIOA-compliant customer service.

The Board established and will maintain a customer centric design which will be aligned with the principles outlined in the State Plan: Engaging businesses, providing excellent customer service, building an efficient workforce system, developing standards, policies and procedures, using technology, ensuring a system that serves all and is accessible to individuals.

The Board will continue to conduct periodic customer and client satisfaction surveys to serve as a guidepost for measuring success in offering excellent customer service. These surveys will assist in identifying systemic issues needing improvement and will be addressed and incorporated into excellent service delivery system immediately. To ensure this happens, each year the One Stop Operator will establish a staff training plan.

Section 4: Title I – Adult, Youth and Dislocated Worker Functions

Describe the type and availability of adult and dislocated worker employment and training activities in the Local Area.

Anne Arundel Workforce Development Corporation (AAWDC) was designated by the Anne Arundel County Local Workforce Development Board as the provider of Adult, Dislocated Worker, and Youth services in Anne Arundel County. All Adult and Dislocated Worker services are designed to start, advance, or transition County residents on a pathway to family-sustaining employment in in-demand industries.

Activities	Partner(s)
Eligibility of Services	Core Partners
Outreach, intake, orientation	Core Partners, AACPL
Initial assessment	Core Partners
Labor Exchange services	MD Labor
Referrals to programs	Core Partners, AACPL
Labor market information	AAWDC, MD Labor, EDC
Supportive services information	Core Partners, AACPL
Unemployment Insurance information & assistance	MD Labor
Financial Aid information	Core Partners
Comprehensive assessment	Core Partners
Individual employment plan	AAWDC, DORS
Career planning, counseling	AAWDC, DORS
Short-term prevocational services	AAWDC, DORS
Work experience	AAWDC, DORS, DSS
Out-of-area job search	MD Labor, DORS
Financial literacy services	AAWDC, CBOs, FBOs
English language acquisition	AACC, CBOs
Workforce preparation	Core Partners, DSS
Occupational skills training	Training Providers, DORS
Work and Learn	AAWDC, DORS
Programs that combine workplace training w/ related instruction	AAWDC, DORS, Training Providers
Training programs operated by private sector	AAWDC
Skill upgrading and retraining	Training Providers, DORS
Entrepreneurial training	AAWDC, Training Providers
Customized training	AAWDC, Training Providers, DORS
Incumbent worker training	AAWDC, EDC, MD Labor, Training
Adult education and literacy activities	AACC, DORS
Job readiness training	Core Partners

** Core Partners – Maryland Department of Labor; Division of Rehabilitation Services; Anne Arundel Workforce Development Corporation; Anne Arundel Community College.

Describe how the Local Board will coordinate workforce development activities carried out in the Local Area with statewide rapid response activities.

The primary goal of Rapid Response is to assist affected employees during a downsizing event. Engaging with the employer quickly helps maintain overall productivity and worker morale and decreases stress-related absenteeism during a layoff event. It also plays a key role in getting affected workers reemployed as quickly as possible. When the need for Rapid Response arises, Anne Arundel's Core Rapid Response team works with employers to determine what services impacted workers may need. These services may range from general information to in-depth guidance regarding benefits associated with unemployment insurance and other critical elements of transition assistance. Once the desired services are determined, meetings are typically scheduled with company representatives and employees of the affected organization. When necessary, multiple local areas will coordinate their services through the Maryland Workforce Association.

Describe the type and availability of youth workforce development activities in the Local Area, including activities for youth who are individuals with disabilities, which description and assessment shall include an identification of successful models of such youth workforce investment activities.

The Board recognizes the need to prepare the emerging workforce for starting on a career path and acquiring the necessary education, skills, credentials, and experience. To facilitate the process and help youth find their career path, the Board will incorporate the 14 elements of the Youth program described in more detail in part M below.

The Board will continue to support a model that includes career exploration, essential skills training, occupational trainings that lead to credentials, work-and-learn opportunities, and apprenticeship opportunities for in- and out-of-school youth. Participants start their programs by going through a bootcamp that includes career exploration activities, job readiness trainings, aptitudes, skills, and barrier assessment. Participants develop a success plan incorporating objectives and main milestones. The next step for participants is to build their occupational skills and work further on job readiness skills.

In addition, the Board continues to support the establishment of an affiliate location or a designated area of a career center exclusively focused on the needs of youth ages 14-24.

In order to prepare the emerging workforce, the Board will support further development and improvement of the industry "academies" approach that focuses on high-growth industries in the County and surrounding regions. These academies align with the required elements for youth programming. Specific focus is made on career exploration, barrier removal, mentoring, essential workplace skills, work-and-learn opportunities, and connection to employment. These tools ensure that all 14 elements are being provided to the youth population. The primary focus is on the out-of-school youth population with a secondary focus on the in-school youth population (specifically seniors not pursuing post-secondary education). In addition, businesses and industry navigators play an integral role in the development of industry-specific training curriculum and certification as well as serving as mentors and supporters of work and learn opportunities.

Targeted outreach efforts will continue focusing on specific areas within the County with the highest unemployment rate of out-of-school youth. Anne Arundel Student Career Excellence (AASCE) programming will also serve as a feeder for OSY activities. AASCE career coaches are located in every middle and high school in Anne Arundel County. The program focuses on career exploration through personality and career assessments, essential workplace and job readiness skill development, and post-graduation planning. Graduating seniors who are determined to not be college and career ready will be referred to the Title I OSY program for services.

The Department of Social Services and the Division of Rehabilitation Services will refer clients to Anne Arundel County YouthWorks initiative for job readiness and occupational training services. This will allow the YouthWorks initiative to customize programs, workshops, and trainings that incorporate case management, GED attainment, and barrier removal. Youth Career Coach in partnership, with the Business Solutions Team, will engage in awareness events for businesses to better understand the return on investment in employing youth with disabilities.

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

The Alignment Committee would like to develop a common referral process which includes referral and information release forms to be used by both education and workforce, as well as setting up a shared tracking system. The community college and workforce will continue to build upon the process the integrated participant assessment and enrollment process developed within the Career Pathways grants programs. This will decrease duplication of efforts spent on document and data/information collection for all partners and, more importantly, will make the service delivery process more efficient from a client perspective.

AAWDC and Anne Arundel Community College (AACC) are co-located at the new Career Center, improving the integration and alignment processes described above. AACC and AAWDC developed efficient recruitment, assessment, and enrollment processes that they implement together, which enhances customer experience and creates savings for both organizations.

The Board recognizes the need to prepare youth who are not continuing into post-secondary education and those who have recently completed it by providing career-related information and resources. Anne Arundel Student Career Excellence (AASCE) is a partnership between the Board, AAWDC, AACPS, and AACC. The partnership allows for the smooth coordination of services delivered within public schools.

The Board formed a task force to provide oversight and guidance for AASCE implementation. The task force members include additional service providers within the schools, including JobCorps, DORS, DSS, the Partnership, and other CBOs. The task force ensures that all workforce services for middle and high school students are coordinated and aligned and reduces duplication across all partners within the schools.

As a part of this partnership, AACPS restructured this year to create a Director of Workforce Services. This individual is tasked with greater coordination across multiple AACPS programs,

including internships, CTE programs, and apprenticeship at the high school level. This position will become the public school representative to the Local Board.

Through AASCE, AACPS guidance counselors, work-based learning coordinators, and transition coordinators are being educated on the workforce system and services available to in-school and out-of-school youth and young adults.

Students attending evening high school will be contacted and offered services that ensure they not only get a high school education and diploma but are also prepared to enter the workforce.

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

Transportation barriers have been identified by the Business and Industry committee as one of the major barriers for employment in the County. This problem must be tackled on both regional and local levels. The Board will continue to actively participate in conversations around workforce transportation on state and regional levels. At the same time, the Board will explore Rideshare models and usage of technology in connecting participants to training and employment. The Board is also experimenting with innovative models and working with companies like Uber, Lyft, and others. The COVID-19 pandemic and lockdowns encouraged development of virtual service delivery to include workshops and sessions for the general public, specific job readiness trainings as well as occupational training to be delivered either fully or partially online. These efforts continue unabated as a virtual services model allows participants who have transportation barriers to access services and obtain skills and credentials necessary to meet industry workforce requirements.

The Board will continue to provide transportation supportive services on a case-by-case basis if assistance is required to participate in an education or training activity. Assistance after training may be provided on a case-by-case basis, as well.

Describe how the Local Board will utilize Local Adult Funding, based on adult priority groups as specified in the State Plan.

The Board has identified several targeted populations in Anne Arundel County in the table below. These populations will receive priority of service alongside targeted populations at the State and Federal level. Local priority of service will come after Federal and State priorities have been addressed. At least 75% of Title I Adult funding should be allocated to individuals in a priority or targeted population.

Targeted Populations
Families living below the ALICE (Asset-Limited, Income-Constrained, Employed) threshold
Justice-involved residents, especially transitioning back into the community
Homeless individuals and those at risk of homelessness
Individuals receiving Public Assistance (TANF and SNAP)

Individuals who do not have a HS diploma
Individuals with disabilities
Long-term unemployed
Veterans, transitioning service members, and active-duty spouses
Older workers (50+)
Out-of-school youth ages 18-24

The Board recognizes the need to extend the length of time individuals are engaged in the workforce development system and charges the partners to come up with innovative services to meet clients where they are to start, advance, or transition to a new career path; address their barriers to employment; ensure that they have essential workplace skills and industry certifications in order to meet their full career potential. This is particularly important when working with ALICE population to allow for exploring career opportunities, find the right approach to obtaining additional skills and credentials, and remediate barriers. A holistic approach including a comprehensive barrier and skills assessment as well as an expanded IEP that includes not only the participants, but their families and will leverage the system partners to connect them with expanded services.

The Board encourages the use of a holistic approach to working with priority and targeted populations. Typically, these groups need more intensive services and wrap-around support in order to succeed. Intensive case management is required throughout the entire individual experience, from outreach and screening to placement and retention. Services to be provided to individuals include essential workplace skills training, life skills, job readiness training, barrier removal, career exploration, hard skills enhancement/occupational training, work and learn opportunities, connection to employment, and retention services. Additionally, the Board recognized that extra attention will need to be given to follow-up services to ensure career progression and achievement of personal career goals.

Contextualized learning and bridge programs will continue to be used to blend basic skills and occupational training for Adult populations to quickly and efficiently move them to employment. AAWDC, as the Board's Title I service provider, has previously operated the Career Pathways initiative. This initiative provided an excellent foundation, allowing for the community college and AAWDC to work together on processes and procedures that are aligned and efficient. The initiative allowed participants who did not score at a sufficient level on their TABE to participate in occupational training with additional support. This successful initiative by AAWDC and AACC will be replicated based on clients' needs and funding.

To support the challenges that clients face in obtaining employment and training, the Board will ensure strong collaboration and alignment of supportive and wraparound services with partners with expertise in providing these services. A flexible supportive services policy was developed to mitigate barriers to employment that clients face.

AAWDC utilizes and disseminates data provided by the Office of Performance and Compliance that tracks clients using segmentation. The data tracks Adult performance measures including training, industry, and certifications. Local and regional labor market information is utilized as the guidepost for determining both classroom and individual training. Training is required to be aligned with in-demand industries in the county and regional areas along with in-demand occupations. Training curriculum development will be led by businesses and industry leaders using our industry sector training model, and along with the community college system and other training providers in determining content and certifications that align with job opportunities.

Clients will provide evidence of employment at the conclusion of training (*this may include stackable credentials*), or will be connected to employment opportunities during the period of training to ensure that all training leads directly to employment.

Primary funding for training will focus on the above criteria along with data that aligns with career interest, alignment with high-growth industries and in-demand occupations and preferred training format (*ITA versus Class-size training*).

Incumbent Worker training will be provided to current employees who need additional upskilling and/or new certifications. This model will allow clients to progress on their career pathway. This strategy is particularly important when serving the ALICE population who by definition are employed, but don't make enough to be at a self-sufficient level. It allows them to work while acquiring skills that will help them progress along a career pathway or begin a new career. This service is becoming increasingly essential for employers as well, allowing them to fill in gaps they are unable to fill with new hires due to the labor force shortage. This training is a win-win for both workers and businesses.

Describe how the Local Board will utilize Local Dislocated Worker Funding.

The Board's vision is to provide individuals who lost their jobs through no fault of their own with an opportunity to gain skills that would allow them to quickly reconnect with employment. The Career Coaches conduct an assessment of skills and experience to identify skills gaps, transferable skills and create an individual employment plan. Coaches use innovative techniques to address barriers to reemployment of dislocated workers. Where necessary, training focuses on short-term occupational programs that lead to certification/credential and/or work experience training, called work-and-learn opportunities in Anne Arundel County. Credentials are an important priority since they allow an individual to be marketable within the industry or occupation and grow in the field along the chosen career pathway. Work-and-learn opportunities do not necessarily provide a certification but give a chance to obtain work experience and skills through performing an actual job. For certain occupations this experience is very valuable since it cannot be substituted by credential and/or regular training. This model also allows a business to establish personal relationships with an individual and make decisions about a cultural fit.

To support the challenges that clients face in obtaining employment and training, the Board will ensure strong collaboration and alignment of supportive and wraparound services with partners with expertise in providing these services.

Describe how the Local Board will define "self-sufficiency" for employed Adult and employed Dislocated Worker participants.

The Board has adopted a living wage standard for self-sufficiency. To calculate the living wage, the Board has opted to utilize the Massachusetts Institute of Technology (MIT) Living Wage Calculator at livingwage.mit.edu. For Dislocated Workers, the Board will consider a participant as an underemployed Dislocated Worker if the current family income is 75% of the pre-layoff family income and the dislocation has occurred during the past three years. For more information, see Attachment 11 – Self-sufficiency and Underemployment Guidelines.

Describe the Local Board's definition of "unlikely to return to previous industry or occupation" when required for eligibility for Dislocated Worker services.

The Board defines "unlikely to return" and communicates it through policy. This policy is reviewed on a regular schedule and is updated as necessary. Currently, the policy, which is available in Attachment 14 – WIOA Dislocated Worker Unlikely to Return Policy, states that an individual is unlikely to return to their previous occupation or industry if:

The individual who is laid off without a recall date, or the recall date has passed, and falls into one of the following categories:

- The number of jobs in the applicant's previous industry and occupation is declining based on Labor Market Information data; or,
- The projected annual increase in employment growth within the local area based on Labor Market Information or O*Net is fewer than 100 jobs in the previous industry, including replacements, or the projected annual increase in growth openings is fewer than 30 jobs in the previous occupation; or,
- The applicant is dislocated from a job not on the Local Area's new and emerging industries and occupation sector priority approved list; or,
- The applicant has conducted a dedicated but unsuccessful job search in the previous industry and occupation, as evidenced by employer rejection letters or employer contact logs; or,
- The applicant is unable to perform the duties of the previous job due to age, ability, or disability.

Describe how the Local 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 Board defines "an individual who requires additional assistance to complete an educational program or to secure and hold employment" as an in-school youth who meets one of the following conditions:

- Has an Individualized Education Program (IEP);
- Currently one or more grade levels behind their peer group;
- Has never held employment or has had three or more jobs within the previous 12 months or has been terminated within the previous 12 months;
- Lives in a household where one or both of their natural parents are absent;
- Is an emancipated youth; or
- Has been treated for a substance abuse related issue.

The Board recognizes that only 5% of all ISY participants may use this definition for program eligibility.

Describe how the Local 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).)

Proposed definition – The Board defines "a low-income individual who requires additional assistance to complete an educational program or to secure and hold employment" as an out-of-school youth who meets the WIOA definition of low-income and meets one of the following conditions:

A. Has earned some post-secondary credits, but did not complete a post-secondary program and is not currently enrolled in post-secondary education;
B. Has never been employed or has had three or more jobs within the previous 12 months or has been terminated within the previous 12 months;
C. Has been actively seeking employment for at least two months and remains unemployed or underemployed; or
D. Has been treated for a substance abuse related issue.

Describe the documentation required to demonstrate a "need for training."

The Board defined the documentation required for training in local policy guidance. See Attachment 1 – Occupational Training Services for policy.

Describe how the Local Board will provide the fourteen required program elements for the WIOA Youth program design and whether the Local Board has contracted with youth services providers.

Program Element	Agency	Description of the service
Tutoring, skills training, and dropout prevention	AACC, OIC	Referral to resources such as GED prep, tutoring, Basic Computer skills, mentoring, ABE
Alternative secondary school services	AACPS	Referral to available resources
Paid and unpaid work experiences	AAWDC and local businesses	Work with area businesses to develop suitable opportunities for participants
Occupational skills training	WIOA approved training providers	Funding assistance, case management – needs assessments and retention/engagement services
Leadership development opportunities	AAWDC, EDC and training providers	Workshops on leadership and entrepreneurship.
Supportive services	AAWDC, partner agencies, and community organizations	Referral to available supports, needs assessments, funding assistance
Mentoring	AAWDC and business partners	Case management services provided by career coaches; career guidance and mentoring incorporated into work experiences.
Follow-up services	AAWDC	Case management to ascertain needs are being met and support for job retention
Counseling	AAWDC	Case management services provided by career coaches.

Concurrent education and workforce preparation activities	AAWDC and training providers	Case management services provided by career coaches. Cohort trainings and ITA trainings designed to incorporate workforce prep activities into the training plan designed for each participant
Financial literacy education	AAWDC, Operation Hope and Maryland Cash Campaign	Credit and money management workshops
Entrepreneurial skills training	AAWDC, Operation Hope, SCORE, EDC, and self- employed business owners	Entrepreneurship workshops, guest speakers
Labor Market Information (LMI)	AAWDC	Career exploration, MWE, O*Net, Career Coach platform and other online research and statistical websites
Preparing for Post-Secondary Education and training	AAWDC	AASCE, guest speakers, field trips, extra-curricular club, professional development classes, summer youth program

Describe the steps the Local Board will take to ensure at least 20% of Youth Funds are used for work-based training activities.

The Board ensures that at least 20% of the Youth funds are used for work-based training activities. The Director of Finance will provide updates to the Board on relevant expenditures at every full Board meeting. The program director and Director of Finance will keep budgetary track of the percentage to ensure that the requirement is met.

Describe the Local Board's goals to serve out-of-school youth and identify specific steps that have been taken to meet this goal. If the Board's goal is under 75%, describe how the Board will implement the waiver and how the Board will enhance connections to Youth Apprenticeship programming, increase DORS co-enrollment, and make changes for In-School Youth (ISY) services.

The Board recognizes the importance of focusing on serving out-of-school youth. Therefore, 75% of WIOA Youth funds has been allocated to serve this population segment.

Outreach efforts will be conducted throughout the County and will, include participation in and hosting of community youth events as well as digital outreach strategies (i.e., social media, texting). Partners such as the public school system, community-based, government, quasi government and faith-based organizations will also be leveraged to reach harder to serve youth.

Innovative assessment and career exploration tools such as Career Scope, Career Coach, "14 elements" are used to help out-of-school youth identify their strengths and career trajectories. Assessment outcomes will help youth and CNSs to develop career pathways and an array of services. The services will include: career exploration, mentorship programs, work-and-learn opportunities, and participation in industry academies.

Describe how the Local Board will provide basic and individualized career services to customers and how services will be coordinated across programs/partners in the AJCs.

To allow for seamless and streamlined referral and customer-centric service delivery process, the Board created the local Alignment Committee to address the coordination of basic and individualized services.

No two customers entering the American Job Center or referred from our partners are alike and each require a unique set of services. These services vary from simply using the resource room to print out a resume or using the computer to apply for a job to a combination of more extensive services which may include workplace excellence skills, occupational skills, supportive services, occupational training, work-and-learn, and job placement assistance. The workforce system partners recognize the need for individualize services. To accomplish this, processes including intake, assessments, and individual employment plans (IEPs) are in place to ensure customers receive the services they need. To date the Alignment Committee has established regular cross-training of staff about each partner and program services so staff know about all of the services available.

The task of coordination across programs and partners is always changing and a challenge, but the Anne Arundel System sees this as central to its ability to provide effective and efficient services. The Alignment Committee has plans to continue its efforts toward a joint referral system and is developing a joint outreach and communication strategy to better communicate both internally within the workforce system and externally to the public about the services we provide to continue effective and efficient services.

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

The Board adopted a case management policy to include follow-up services (see Attachment 3 – Case Management Policy). Currently, the Board uses guidelines and rules established by legislature and the State. Follow-up services are conducted at least once a quarter for adults and dislocated workers and once a month for youth clients. A script for a phone call contact was developed and implemented, and an enhanced Verification-of-Employment form was also introduced to track employment outcomes for every participant through the entire follow-up period. AAWDC also has the capability to use text messaging to obtain follow-up information.

Section 5: Title II – Adult Education and Family Literacy Functions

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 career pathways models.

To ensure that all County residents have an opportunity to enhance skills that meet employers' requirements, the Board supports innovative techniques such as contextualized learning that blends both adult basic skills and industry skills. This model provides individuals with the opportunity to start on career pathways to middle skill careers. The Board will support the continued development of the career pathway maps for occupations within in-demand, HITCH, industries. This will be explored and implemented by the coordinated effort of workforce development and adult education partners.

The Board will ensure strong alignment between workforce development and adult education services including finding innovative and efficient collaboration tools. Representatives of adult education providers are members of the Alignment Committee that was established by the Local Board to ensure alignment of services and efficiency of their delivery are maintained.

In accordance with guidance provided by MDOL, the Board will review the Title II Adult Education grant application to make sure it is in line with the Board's vision and priorities.

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 such assessments will be conducted, consistent with this policy;**

- **How your Area will coordinate testing between workforce development and adult education providers; and**

- **How your Area will ensure that test administrators are to be trained. (MD Labor's policy and applicable testing guidelines)(DWDAL's policy on assessments)**

Adult Education and workforce partners will administer the CASAS, TABE or other National Reporting System (NRS) approved assessments to participants in need of basic skills remediation. Participants with limited English language proficiency will be referred to the AACC

ESL program for assessment and will be administered the CASAS or other approved assessments. Participants entering the National External Diploma program (NEDP) will be administered the CASAS or other NRS approved assessments. The MOU will include core partners and will address the specific responsibilities of each partner under Title II.

Participants are efficiently referred to and from Workforce Development and Adult Education providers. Referrals include basic demographic information and assessment scores. An Information Release form (written in accordance with FERPA) is signed by participants and is included as part of the referral process. Referral forms will be sent to the identified contact person within each organization.

All assessments will be administered according to the Maryland State Assessment Policy. Anne Arundel Community College (AACC) Adult Education staff will train workforce partners who administer the TABE and advise assessment staff on the State Assessment Policy to ensure compliance. Workforce partners will assess participants based on the requirements for various training programs: the choice of assessments will be dictated by industry needs. AACC staff will administer the CASAS, or other approved NRS assessments, to all participants who are interested in entering the Adult Education or English Language Learning programs. Trained assessment staff from the National External Diploma program (NEDP) will administer the CASAS, or other approved NRS assessments, to participants interested in entering that program.

Workforce development will assess participants who are eligible for their programs. If participants are identified as lacking a high school diploma or English language proficiency, they will be referred to the Adult Education programs at AACC.

In adherence with the guidance provided in the Maryland State Assessment Policy, the Adult Education provider will ensure that partner test administrators are trained to administer NRS approved assessments.

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 Dean of Continuing Education and Workforce Development serves on the Local Board. The Dean will have regular communications with the Title II Grant Administrator from AACC regarding relevant items discussed with the Local Board. The AACC Grant Administrator is a member of the Anne Arundel County Alignment Committee. Title II related issues or concerns are addressed during the monthly Alignment Committee meetings and are also relayed to Local Board members at meetings.

Describe how adult education services will be provided in the AJC system within the Local Area.

Adult Education services including Adult Basic Education, English Language Learning and GED classes are provided throughout the county in locations that are easily accessible by public transportation. To meet the needs of individuals with limited access to transportation, lack of childcare, and need for flexible schedules, synchronous and asynchronous classes and the

National External Diploma Program (NEDP) are available. The NEDP is an online program that provides an alternate pathway to earning a Maryland High School diploma.

The performance outcomes will be shared with the Governance Committee of the Workforce Development Board through a scorecard to be developed by the Office of Research, Performance and Compliance.

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 jobseekers looking for IELCE services. (See WIOA Section 243(a))

Using an analysis of county and regional labor market and regional employment demands, the local WIOA board identified the following industries as priorities for employer engagement and jobseeker career pathways: Hospitality; Transportation; Construction, Information Technology, and Healthcare, referred to as HITCH.

AACC, the adult education provider, developed Integrated English Literacy and Civics Education (IELCE) training programs based on HITCH industries. To prepare English language learners for employment in occupations that lead to self-sufficiency, the following components are included in all training programs: occupational skills training, contextualized academic skills instruction and workforce preparation activities.

Curriculum developed for English language learner occupational training programs aligns with the English Language Proficiency Standards for Adult Education and meets the unique needs of our IELCE/IET participants. Instruction focuses on scaffolding the core occupational curriculum by introducing and supporting critical vocabulary and providing context for key technical terms and concepts. Learners receive supplemental English language instruction with a focus on study skills, critical thinking, listening/speaking and reading/writing.

Workforce preparation activities help learners self-assess, understand, and develop critical skills to obtain and retain employment in technical professions and trades. Learners examine necessary skills for employment through use of authentic case studies and student discussion with a focus on developing both business sense and pride in one's trade.

AACC has well established partnerships with area hospitals, dentist offices, healthcare facilities and trade associations. Partners engage in mock interviews, provide internship or externship opportunities often leading to employment.

Section 6: Title III – Wagner-Peyser Functions

Describe your plans and strategies for maximizing coordination of services provided by the State employment service under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) as well as services provided in your Area through the AJC delivery system to improve service delivery and avoid duplication of services.

The services provided under the Wagner-Peyser Act will be basic career services including assessment of skill levels, abilities, and aptitudes; career guidance when appropriate; job search workshops; and referral to jobs or training as appropriate. Staff will also informally assess customers to determine job readiness and barriers to employment and make referrals to internal partners as well as external partners to address any issues affecting job attainment and retention. The services offered to employers, in addition to referral of individuals to job openings, include matching job requirements with an individual's experience, skills and other attributes; helping with special recruitment needs; assisting employers in analyzing hard-to-fill job orders; assisting with job restructuring; and helping employers deal with layoffs.

Additional services include a computerized career information system including access to state job bank resources and institutions and organizations that provide training; the development and distribution of state and local workforce information which allows individuals, employers, providers and planners of job training, and economic development to obtain information pertaining to job opportunities, labor supply, labor market or workforce trends in particular industries.

Priority of service will be given to veterans, including transitioning veterans and eligible spouses. Though we will assist all workers eligible to work, the focus will be made on unemployment insurance claimants who participate in RESEA and ROW workshops.

The Maryland Department of Labor (MDOL) is a core partner in the Anne Arundel County Career Center, which makes it easier to coordinate services. It creates opportunities for joint staff training, experience and data sharing, and warm referrals. In particular, the Alignment Committee brings all system partners together to share experience and find ways for further coordination and alignment.

A detailed description of roles and responsibilities will be outlined in the MOU and RSA.

Describe how your Board will coordinate with the Wagner-Peyser program to provide migrant and seasonal farm workers in its Local Area will be provided employment services.

Wagner-Peyser staff will verify monthly all jobseekers that enroll as Migrant Seasonal Farm Workers in the Maryland Workforce Exchange. Verified Migrant Seasonal Farm workers will be contacted and informed of the various training, employment, and supportive services available to assist them with achieving greater economic stability. Wagner-Peyser staff and WIOA staff will work closely to achieve those goals.

Outreach Workers will be required to locate and contact MSFWs who are not being reached by the normal intake activities of the local Workforce Center to enhance the employability of MSFWs and provide supportive services.

The goals of the Outreach Program are to:

- Provide basic services where MSFWs work, live, or gather for recreational purpose;
- Inform MSFWs of the full array of services available at the Workforce Center; and
- Provide needed supportive services and referral to other service providers.
- Conduct random, unannounced field checks to agricultural worksites where MSFWs have been placed through the intrastate (MWE) and interstate recruitment system.

The outreach worker ensures conditions are as stated on the job order and that the employer is not violating an employment-related law. The outreach worker will also document and refer information to the RPD for processing if they see or learn of a suspected violation of Federal or State employment-related laws and will conduct Pre-Occupancy Housing Inspections

Should MDOL recruit and/or refer MSFWs to an agricultural employer (either intrastate or interstate) the MDOL MSFW Outreach Worker will complete a housing inspection using ETA FORM 338.

Per Policy Issuance 2018-01, MDOL will conduct one housing inspection, per season and per employer, for agricultural workers who were recruited by MDOL. If the employer also hires a H2-A worker, and a housing inspection was already completed, the housing inspection requirement will be considered met.

Identify who is responsible for conducting migrant and seasonal farmworker housing inspections.

The MDOL Reemployment Program Director for Anne Arundel County will determine who is responsible for documenting migrant and seasonal farmworker housing inspections. Right now, there are no MSFW registered in the county.

Section 7: Title IV – Vocational Rehabilitation Functions

Describe the cooperative agreements that have been replicated between the Local Board or other local entities and the local office of a designated State agency or unit administering programs under title I of the Act. These agreements, made with the Maryland State Department of Education's Division of Rehabilitation Services, aim to enhance the provision of services to individuals with disabilities and others. Your efforts to improve services may include cross-training of staff, technical assistance, information sharing, cooperative work with employers, and other collaborative and coordinated initiatives. (See to Local Plan Guidance for applicable policies)

The Maryland State Department of Education's Division of Rehabilitation Services (DORS), in accordance with 29 U.S.C. 721(a)(11) will provide the following services to youth and adults with disabilities:

- Provide intake, orientation, and assessments for disabled jobseekers;
- Promote employment of persons with disabilities;
- Based on a comprehensive assessment of an individual's disabilities, determine an individual's eligibility for services in accordance with the Division's Order of Selection criteria;
- Develop an Individualized Employment Plan;
- Provide guidance and counseling, physical restoration, and training to eligible persons with disabilities;
- Provide follow-up services to enhance job retention;
- Provide other vocational services as may be available and appropriate;
- Provide Pre-Employment Transitioning Services for students with disabilities, as defined by WIOA;
- Provide Supported Employment Services for youth and adults with disabilities as defined by WIOA;
- Provide independent living services to enhance the capacity of persons with disabilities to live unaided in the community;
- Provide performance information as required by WIOA;
- Provide cross-training of workforce staff on disability related issues;
- Provide technical assistance on disability related issues and on assistive technology;
- Engage employers through the Division's Business Services Representatives;
- Work in a collaborative manner to coordinate services among the Workforce Partners for youth and adults with disabilities.

Describe how individuals with disabilities will be served through the AJC system in your Local Area.

DORS will serve individuals with disabilities who are both eligible to receive services and who meet the Division's Order of Selection criteria. For those individuals who do not meet DORS Order

of Selection criteria and subsequently are placed on a waiting list for services, referrals to partners will be coordinated to ensure connection to appropriate resources. As outlined in the Resource Sharing Agreement, DORS will contribute to funding a One Stop Operator to oversee operations at the American Job Center in Linthicum, and Career Center staff members to help facilitate a streamlined process for all consumers coming into the American Job Center in Linthicum. Discussions related to developing a universal referral continue in the Alignment Committee meetings in which DORS actively participates. The current workforce service delivery process will continue to be monitored and amended as appropriate to ensure efficiency and that all information and services are accessible to individuals with disabilities. The Career Center will also serve as a Ticket to Work site for populations with disabilities.

DORS will provide cross-training, including Disability Awareness, to partners as part planned local convenings and training that include all front-line staff within the Anne Arundel County Workforce System.

As a result of COVID-19, DORS began offering a variety of virtual services. A number of those virtual services continue to be available post-pandemic for those preferring to have that option. DORS virtual services are ADA compliant, and DORS will work with other partners to ensure their virtual services are ADA compliant as well.

Section 8: Temporary Assistance for Needy Families Functions

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

The Board's goal is to ensure that Temporary Assistance for Needy Families (TANF) recipients have the skills needed to become self-sufficient and to advance on a career path to middle- and high-skill jobs. Therefore, the Director of Anne Arundel County Department of Social Services (DSS) is a member of the Board, and Anne Arundel Workforce Development Corporation (AAWDC) is the TANF provider for job readiness and job placement services.

AAWDC staff is co-located with DSS in both the Glen Burnie and Annapolis offices as well as virtually. AAWDC staff provides essential skills workshops, life skills and job readiness training, case management, barrier removal, career exploration, hard skills enhancement/occupational training, work and learn opportunities, connection to employment, and follow up and retention services to TANF recipients to ensure that they are self-sufficient.

The Board will also put an emphasis on working with adults and their children at the same time to implement two generational approaches.

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 provide 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.**

AAWDC has been providing job readiness and placement services for the TANF population for almost 9 years. For easy referral, AAWDC staff have been co-located with the DSS offices in Glen Burnie and Annapolis. Since the pandemic the services have been offered virtually. The DSS locations serve as affiliate career centers to provide services not only to the TANF population but for all DSS clients.

Leverage existing financial and in-kind contributions to the WIOA system

AAWDC will use TANF funds first to provide career readiness, occupational and essential skills training, and barrier removal. Then, the Workforce Innovation and Opportunity Act (WIOA) funding will be blended in to move TANF participants to career pathways and placement at a family sustaining wage.

Cross train and provide technical assistance to all WIOA Partners about TANF

The State of Maryland has required TANF to be a core partner, and therefore the Alignment Committee has discussed integrated staff training and ways to share information between all partners on a regular basis. This is a prerequisite for creating a common intake process and integrated service delivery system. The Alignment Committee includes local DSS representatives and information about TANF will be discussed and presented at those training courses and included in the distribution materials.

Ensure that activities are countable and tracked for the TANF Work Participation Rate (WPR)

AAWDC contributes to DSS work participation rate (WPR) calculations through the Work Opportunity Record Keeping System (WORKS) tracking shared tracking database. AAWDC is responsible for participation rate calculations and population of relative tracking databases. AAWDC also provides weekly, monthly, quarterly, and annual reports in accordance with DSS requirements.

Access to business services and employer initiatives

AAWDC will continue to operate and expand its work experience initiative, which constitutes the placement phase where clients are matched with potential unsubsidized employment opportunities. Qualified and pre-screened clients could also be referred to entry-level jobs. A Talent Acquisition Specialist is tasked to implement these strategies of connecting clients with meaningful job experiences that lead to full-time employment.

Contribute and provide baseline outcomes data to the WIOA system

The Alignment Committee is exploring ways to share client level data among partners. In the meantime, the reports will be shared on a regular basis with all partners.

The Board's vision is to adopt Benchmarks of Success developed by the WIOA Performance Workgroup.

Describe the LDSS representation on the Local Board to ensure that TANF expectations, roles, and responsibilities are addressed in the Local Area.

Local Director for the Department of Social Services serves on the Local Board and the Deputy Director and Resource Division Director participates on the Alignment and Targeted Populations Committees.

Provide a description of what strategies the Local Board employs to support TANF recipients in accessing skills and credentialing, life management skills, and employment to improve the financial status of those exiting the TANF program.

Workforce development services are being provided by AAWDC as a DSS vendor. Those services include; barrier and skills assessments, financial literacy, career coaching, facilitation of training and work and learn opportunities, multi-generational services, provision of supportive services as well as referral to other partners, job development and follow up activities. Since the start of the pandemic these sessions are offered remotely. To accommodate our clients who may present with barriers, DSS expects to offer a hybrid model post pandemic which will include both in person and virtual services.

Section 9: Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)

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.

SNAP work registrants receive WIOA services through JobsWork Anne Arundel (JWA). JWA is a partnership between AAWDC and the Anne Arundel County Department of Social Services to get recipients of SNAP on a path of self-sufficiency through barrier removal, up-to-date skills and certifications training, essential skills development, and work experience placement that leads to employment. All partners also document during the intake process (including at other AAWDC locations, AACC, DORS, and MDDOL) whether a participant is receiving SNAP benefits and is a SNAP work registrant. The majority of services, however, are provided through JWA or as a result of a referral from JWA as it is the first point of contact for SNAP work registrants.

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.

Below is a listing of the 3rd party partners in our local area including a description of the service area, target and special populations, description of services, certifications offered, and employer partners. To ensure that these partners are aware of all workforce development programs available in the WIOA system, streamline resources, and prevent duplication, the board's Alignment committee discusses these services and has invited the providers listed below to provide updates about their services to system partners.

Organization	Target & Special Populations	Description of Services	Certifications Offered	Employer Partners
The Light House, Inc. Annapolis	ABAWDs, Voluntary SNAP recipients, Homeless, Substance Abuse Recovery Re-entry	**Light House** will provide job readiness including case management, basic education, and job retention services. Job placement, vocational training, and work experience in Culinary Arts and Facilities Maintenance. Potential credentials earned include: ServSafe, TIPS, OSHA 10, CPR, and First Aid.	Culinary Arts, Building Trades	Fresh Market, Loews, Annapolis Hotel, PeaPod, WaWa, Target
United Way	ABAWDs, Voluntary SNAP recipients	**United Way of Central Maryland** will provide job readiness activities	Healthcare, Automotive, CDL, HVAC, Drone,	

		include barrier assessment, basic education, vocational training, work experience and job retention services. Potential credentials earned in Construction (Apprenticeship Readiness Program), Healthcare (Certified Nurse Assistant training), and IT (CompTIA A+ Certified PC Repair Technician course).	Environment and General Construction, Heavy Highway/Utility, Safety, Washington Laborers Training, Operator Qualifications (BGE)	
It Works Learning	ABAWDs, Voluntary SNAP recipients, Ready by 21, WIOA, youth, homeless	**It Works Learning** will provide eligible SNAP recipients with job readiness training, vocational training, job search training, job retention services, WIOA activities, on-the-job training and barrier removal services for occupations in Health Care Industry	CNA/GNA, CPR certification	FutureCare Senior Care,
MCVET	ABAWDs, Voluntary SNAP recipients, Homeless veterans	**MCVET** will provide eligible SNAP recipients with Barrier removal services, Vocational training, Education ,Job retention services, work experience, self-employment training, work readiness training, on the job training for occupations in Information Technology (Microsoft Basic Skills to A++ Certifications) - IN HOUSE Culinary – IN HOUSE Certified Peer Support Recovery Specialist (CPRS) – IN HOUSE	CPRS, Serve Safe, A++ Certification	

Section 10: Community Service Block Grant Functions

List the Community Service Block Grant (CSBG) providers in your service area and whether they provide employment and training activities.

CSBG provider in the area is the Anne Arundel County Community Action Agency. They provide the following services and conduct the following activities for county residents:

- Education Opportunity Center
- Expansion of youth employment and training programs – especially targeting disconnected youth
- Will have CAA staff trained to facilitate workforce training program for disconnected youth. As a result, potential participants will be referred to the Career Center.
- Have Partners' staff meet with youth in CAA programs to discuss business sector opportunities in Anne Arundel County and surrounding area. As a result, potential participants will be referred to the Career Center.

Describe your implementation and coordination process to enhance the provision of workforce development services for individuals receiving CSBG-supported services that includes:

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

CAA is a Career Center Partner and is co-located at the Career Center. Potential presence of CAA staff at the community locations will be considered. A process of cross staff training and referrals is being implemented to ensure the flow of services.

   o **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;**

Referral process will ensure the seamless approach to service delivery.

   o **Cross training and providing technical assistance to all WIOA Partners about CSBG;**

Staff participate in Partner staff meetings to learn about each other's programs as well as educate on CAA programs. This will also allow for developing efficient strategies and tool for service delivery in the county

   o **Ensuring that activities are countable and tracked for CSBG performance metrics;**

CAA will be using empowOR, HCO, and other programs to track CSBG activities and metrics. CAA reports performance numbers to MD DHCD, which provides the Federal pass-through funding for the State of Maryland, on an annual basis.

- o **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**

The county Business Services Team that is tasked with developing more efficient and streamlined strategies for addressing business needs and facilitate business engagement will work with CAA.

- o **Contributing and providing baseline outcomes data to the WIOA system through strategies for collecting and reporting varied program reporting requirements.**

Community Action Agency will develop an outcomes dashboard in alignment with the Benchmarks of Success methodology. This information will be shared with the Partners to be included into the county workforce system dashboard.

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 Community Action Agency is a member of the Local Workforce Development Board.

Section 11: Jobs for Veterans State Grants Functions

Describe how your Board will provide priority of service to veterans and their eligible spouses.

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

To receive Veterans Priority of Service for a specific program, a Veteran or eligible spouse must meet the statutory definition of a "covered person" and also must meet any other statutory eligibility requirement applicable to the program. For all USDOL funded programs, Priority of Service means access to services or resources earlier than others, or if resources are limited, it may mean access to services and resources instead of general service individuals.

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

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

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

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

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

Customer Service Flow for Veterans AJC staff provides core services and initial assessments to veterans. The receptionist or other AJC staff who work at the front desks are trained to determine whether any customers are veterans. Information can also be gathered on veteran status when the AJC front desk has customers complete their county's "Customer Activity Sheet". Customers who self-attest to veteran status shall receive priority of service from this point forward. There has been a slight change in the Customer Service Flow process. Information can also be gathered on veteran status when the customer registers in the MWE VOS system and identifies him/herself as a veteran.

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 Employment Barriers Checklist to determine whether the veteran qualifies as having one or more SBE.

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

> 1. If the customer qualifies as having QBE, 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 2023 Update: if a customer qualifies as SBE and requires intensive services and they choose to be case managed then they will be with a DVOP. If they choose not to be case managed, and do not wish to be serviced by a (DVOP), basic services are provided by Wagner-Peyser staff

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

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

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

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

2. The applicable Federal program rules require verification of covered Veteran or eligible spouse status at that time.

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

For services that require eligibility verification, such as classroom training, verification only needs to occur at the point at which a decision is made to commit the use of outside resources. For example, to receive training services under WIOA Title I programs, veteran status must be verified. In cases, such as these, verification is only necessary where a decision is made to commit outside resources to a covered person over another individual. Additionally, all DVOP case managed veterans and or veteran spouses referred to grant funded training must be referred back to their DVOP case manager upon completion of their grant funded training in order to complete assigned case management services. For all other purposes, covered persons should be enrolled and provided immediate priority before providing verification as a covered person.

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

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

1. Has been terminated or laid off, or received a notice of termination or layoff from employment;

2. Is eligible for, or has exhausted, unemployment insurance (UI) benefits;

3. Has demonstrated an appropriate attachment to the workforce, but is not eligible for UI and is unlikely to return to a previous industry or occupation;

4. Has been terminated or laid off, or received notification of termination or layoff from employment as a result of a permanent closure or substantial layoff;

5. Is employed at a facility where the employer has made the general announcement that the facility will close within 180 days;

6. Was self-employed, but is unemployed as a result of general economic conditions in the community or because of a natural disaster;

7. Is a displaced homemaker as defined by WIOA 3(16); or,

8. Is the spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of Title 10, U.S.C.), and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member; or is the spouse of a member of the Armed Forces on active duty and is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

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

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

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

Describe how your Board will engage Local Veterans Employment Representatives in engaging and providing services to local businesses.

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

Section 12: Trade Adjustment Assistance for Workers Program Functions

Describe how Trade Adjustment Assistance (TAA) services will be provided in your local area.

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

Describe how Title I staff will provide the TAA services listed above in an integrated manner.

AAWDC utilizes a referral intake process. Trade affected workers will be referred to AAWDC for co-enrolled with the WIOA dislocated worker program or other appropriate program as needed. Trade staff will assess trade affected workers for needs, identify gaps or barriers that require additional support from Title I or other AAWDC-operated programs. Once referred to AAWDC and enrolled in a program, AAWDC staff will co-manage the case with TAA staff to ensure that seamless service delivery.

Describe how Trade participants will be co-enrolled in other programs.

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

Section 13 – Unemployment Insurance Functions

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.

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

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 Local Board will do an informal assessment of jobseekers to determine job readiness and employability. Individuals are then recommended for either the ROW workshop or the RESEA workshop, those going to the ROW workshop usually are in need of less additional services than those attending the RESEA workshop. However, at each workshop information about WIOA services that are available in the AJC as well as with partner organizations are provided and the staff work with participants to address barriers and refer them to additional services as needed including to partner programs.

Section 14: Senior Community Service Employment Program Functions

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 Center for Workforce Inclusion, Inc. (Center), a 501(c)(3) nonprofit organization, is a U.S. Department of Labor Senior Community Service Employment Program (SCSEP) national grantee that provides SCSEP services directly in Baltimore City, and the counties of Anne Arundel, Baltimore, Carroll, Cecil, Dorchester, Harford, Howard, Somerset, Wicomico, and Worcester Counties. The Center will be the national grantee for these counties until June 30, 2028, per the U.S. Department of Labor 2023 SCSEP National Grantee competition. The Center also partners with subgrantees that provides SCSEP services in Frederick, Montgomery, and Prince Georges' counties in Maryland.

Describe how SCSEP services will be integrated within the AJC system in your area, including key components of the SCSEP program available locally

Center SCSEP staff participate on the Alignment Committee as a partner and are involved in the workforce system development process. The Center has an office in Baltimore City, and the Center's staff work a hybrid schedule and are supported by SCSEP job seekers serving as case workers assigned to each county outside of Baltimore City, including Anne Arundel County.

Center SCSEP staff will refer its SCSEP job seekers to the Anne Arundel County One Stops to register for One Stop Services, and to training offered by the One Stops, as appropriate. The Center will also accept referrals from the One Stop of SCSEP applicants who reside in Anne Arundel County. When appropriate, the Center will conduct SCSEP recruitment and intake events at the Career Center.

The Center's SCSEP provides part-time, paid training opportunities for eligible SCSEP job seekers in the form of community service assignments; computer training, job development, soft skills training and more via in-person or virtually. Center staff will share any project publications and materials for distribution at the Career Center and will share Career Center training opportunities with SCSEP job seekers. The Center will continue to participate in the MOU and RSA process with the local board and Career Center relating to the operations of the Career Center.

Section 15: WIOA Section 188 and Equal Opportunity Functions

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

Jason Papanikolas
Anne Arundel Career Center, 613 Global Way, Linthicum Heights, MD 21090
complaints@aawdc.org
410-424-3240

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

The Board is scheduled to have an ADA monitoring completed during the current Fiscal Year. A review of the Board's current website for accessibility was conducted by DORS. Based upon the results of these monitoring, the Board will develop a plan of action and implement as needed. The Board plans to have periodic monitoring to assess physical and programmatic accessibility.

Also, the Board held an ADA (Americans with Disabilities Act) partner training. The training included an ADA overview, what is accessibility, and how to offer assistance to customers so that they can complete their various applications and forms. Accommodations in the hiring process were discussed as well.

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

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

The Board acknowledges that all service providers, including sub-recipients, may be subject to the following provisions of law:

A. Section 188 of the Workforce Innovation and Opportunity Act, which prohibits discrimination on the grounds of race, color, religion, sex, national origin, age, disability, political affiliation or belief and requires that reasonable accommodations be provided to qualified individuals with disabilities in certain circumstances.
B. Section 504 of the Rehabilitation Act, which prohibits discrimination against individuals with disabilities by recipients of Federal financial assistance.
C. Title I of the Americans with Disabilities Act, which prohibits discrimination in employment based on disability.
D. Title II of the Americans with Disabilities Act, which prohibits State and local governments from discriminating on the basis of disability.
E. Section 427 of the General Education Provisions Act, which requires recipients to ensure equitable access to, and participation in, certain programs run by the U.S. Department of Education
F. Maryland's Anti-Discrimination Laws, which prohibits discrimination on the basis of marital status, sexual orientation, gender identity, or genetic information in addition to those covered by Section 188 above.
G. Maryland Anti-Discrimination laws, including 5 MD. STATE GOVERNMENT Code Ann. § 10-1101 stipulates that departments, agencies, and programs shall provide equal access to public services for individuals with limited English proficiency. Maryland Department of Labor's Language Access Plan is utilized by staff to ensure clients with limited English proficiency receive services.

The Board will review the current assurances and update as necessary.

Describe how the Local Board will ensure meaningful access to all customers.

The Board's Alignment Committee is tasked with ensuring that all customers and clients have access to career center services and are able to navigate the system. In addition, the Career Center Managers Committee provides a venue for coordination and alignment of services provided by partners located in the career centers. These services will include services provided to individuals with disabilities and veterans.

The Board supports development of the client centric design at the career centers which identifies each client's individual needs and provides appropriate services. A client centric design group that included representation from MDOL, DORS and AAWDC completed a Course on Human Centered design and submitted a Customer Centered Design project proposal for the White House Learning Exchange & Celebration. The group's project was one of the 15 projects chosen to come to the White House and present their concept for a new Anne Arundel County Career Center (Attachment 2 – Anne Arundel Customer Centric Design).

Improving client flow with a more efficient intake system (as described above) at every entry point has provided more information to the clients, set appropriate expectations regarding services being offered, which resulted in a more meaningful access to services. Additionally, AAWDC has been utilizing virtual workshops, and intake and case management processes that became a valuable tool as a result of the pandemic. Virtual services provide more opportunities for customers to access services from anywhere.

More cross-agency training will be conducted to provide staff of various entry points/locations necessary skills and knowledge so the same array of basic services could be provided in those locations, which would create meaningful access for all clients.

Describe the Local Board's procedures for handling grievances and complaints from participants and other interested parties affected by the local AJC system, including partners and service providers (29 CFR 38.69-97), including:
- o **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.**
- o **Complaints and grievances unrelated to discrimination, including labor standards violations.**
- o **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 equitable relief where applicable.**

The Board is created procedures to handle grievance and complaints.

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

of a participant with an employer that has violated any requirement under WIOA Title I; reinstatement of an employee, payment of lost wages and benefits, and reestablishment of other relevant terms, conditions, and privileges of employment (where applicable); and other equitable relief as appropriate.

Describe how an individual can request accommodation.

If an interpreter is needed, staff need to know which service(s) the client is requesting. The Language Line is contacted to arrange for service(s) to be provided. We also use Language Line if someone calls the AJC, and interpreter services are needed to provide assistance. The AJC has an ADA computer system in the Resource Room if someone needs an adaptable computer system to use (text to voice, increased font size, easy to use mouse).

Describe the Local Board's policy on providing aid, benefits, services, training, and employment, include a statement of assurance that you will provide reasonable accommodation to qualified individuals with disabilities unless providing the accommodation would cause undue hardship.

The Board developed a policy on reasonable accommodations. The policy is focused on assuring equal opportunity and equal access to employment, services, program, and activities for individuals with disabilities. AAWDC will provide reasonable accommodation(s) to a qualified person with a disability to enable the individual to participate substantially in the same way as an individual without a disability.

Describe how the Local Board will comply with the Americans with Disabilities Act, including how the Local Board will provide reasonable accommodation for materials, technology, and facility accessibility. Include how staff will be trained and supported in addressing the needs of individuals with disabilities.

Maryland Division of Rehabilitation Services, as a Core Program Partner, will provide staff and partner training and support for addressing the needs of individuals with disabilities at least one time annually at the Anne Arundel County Career Center. In addition, the Board will request Maryland Division of Rehabilitation Services, as an in-kind contribution, an evaluation of the Centers in the local area to identify areas that may need to be corrected or enhanced to ensure compliance with the Americans with Disabilities Act. Included in the evaluation will be accessibility, assistive technology, rest room availability, and support materials.

The Board will provide reasonable accommodations to qualified individuals with disabilities unless providing the accommodations would cause undue hardship.

Describe the Local Board's policy and procedures to ensure effective communications with individuals with disabilities, including individuals with visual or hearing impairments, equal to that with others.

The Board has made serving individuals with disabilities a priority by ensuring buildings and services are accessible. At the time of the Maryland Division of Rehabilitation Services evaluation, the Board is requesting they review methods of communication and provide suggestions for improvement.

Describe how the Local Board will meet the language needs of individuals with Limited English Proficiency who seek services or information. Include how the Local 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 Board will ensure that the local areas is in compliance with the Maryland Department of Labor's Language Access Plan. Elements of this Plan that will be implemented locally, include:

A. Translation of intake and other important documents into Spanish;
B. Maintenance of a roster of employees and their language skills, including contact information;
C. Develop and cultivate relationships with community organizations that work with LEP individuals; and
D. Train staff and partners on their responsibilities to LEP individuals.

Section 16: Fiscal, Performance, and Other Functions

Identify the entity responsible for the disbursal of grant funds in the local area as determined by the chief elected official. (WIOA Section 107(d)(12)(B)(i)(III) and Section 107(d)(12)(B)(I))

AAWDC is responsible for administering workforce development programs in accordance with the Section § 3-14-102 of the Anne Arundel County Code.

Describe the financial sustainability of the AJC services with current funding levels, and a description of the ability to adjust should funding levels change.

Through the efficient MOU and RSA, the area is able to sustain the current performance level of operating the AJC. If changes to funding occur, the Board will reevaluate the expenditures and consult with all the Partners to determine the determine the most efficient service level and solution for continuing operations.

Describe the competitive process to be used to award the subgrants and contracts in the Local Area for activities carried out under this title, including risk assessment of potential subgrantees and contractors.

Anne Arundel Workforce Development Corporation (AAWDC) has a procurement process that details the competitive selection procedures. The procedures detail the requirements for the preparation of the Request of Proposal (RFPs). A Board review subcommittee makes a selection and recommends to the full Board as to the vendor. AAWDC contracts with the vendor. Risk assessment will become a part of the selection process. (See attachment 4 – Procurement and Contracting Policy.

Describe the Local Board's strategy to become or remain a high-performing board. Describe the process used by the Local Board to review and evaluate performance of the local AJC(s) and the One-Stop Operator.

The Board will comply with Sections 107 and 116 of the Workforce Innovation and Opportunity Act (WIOA) through following requirements as to the Workforce Development Board structure and performance. In particular, the Board will review quarterly predictive reports that show WIOA performance indicators. The Governance Committee will be tasked with oversight of performance and funding.

In addition, the Board will be conducting and reviewing an on-going analysis of WIOA programs' outcomes that look at trends, causal relationships, and impact of the local area; making

decisions accordingly if needed. A Scorecard with the outcome of each partner will be developed and reviewed at Alignment Committee meetings.

The Board will strongly encourage all staff who work with clients and customers to participate in all trainings provided by the Maryland Department of Labor, Licensing and Regulations (MDOL) and U.S. Department of Labor relating to meeting performance standards. Staff may also attend other professional development trainings and conferences such as the National Association of Workforce Development Professionals (NAWDP) and other employment and trainings opportunities as appropriate. At the same time, all service providers (vendors) will receive periodic trainings on performance standards and strategies.

The Board will require AAWDC to conduct an annual independent evaluation of the one-stop operator.

Describe the Local Area's Individual Training Account policy. Include information such as selection process, dollar limits, duration. (WIOA Section 101(d)(6))

The Board has created a section in case management policy for ITAs (see Attachment 1 – Occupational Training Services).

Current guidance for the development and approval of ITAs is as follows:

WIOA Sec. 134(c)(3)(G)(iii) states that "[t]raining services provided under this paragraph shall be directly linked to an in-demand industry sector or occupation in the local area or the planning region." As such, the Board limits individual training to those industries and occupations that the Local Workforce Development Board deems in-demand. Those industries and occupations are identified on the documentation that clients received at intake.

The Board seeks to provide training opportunities within high-demand industries or occupations that aligns with one of the following HITCH categories.

The Board reviews the spending cap for ITAs on an annual basis. In all cases, the Board seeks to provide high-value training solutions by operating cohort trainings in the most in-demand and popular occupations and industries in the local area.

Describe how training services will be provided, including the coordination of training contracts with individual training accounts, and how the Local 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))

The Board has created a case management policy. See Attachment 3 – Case Management Policy.

Training services will be provided in accordance with 134(c)(3)(G) of the Workforce Innovation and Opportunity Act. Training services provided will maximize client's choice in the selection of an eligible provider of such services. As required in the Workforce Innovation and Opportunity Act, training services shall be directly linked to an in-demand industry sector or occupation or related entry level career path course of study.

The Board will support both Individual Training Account (ITA) and Work-and-Learn training (WAL) models for training. WALs are an example of a strategic priority of the Local Board that provides hands-on work experience for clients before they are fully hired. WALs also provide an opportunity for businesses to teach a potential employee and evaluate their suitability for the job. ITAs provide an opportunity for a client to study for and obtain certification or other credential through a training provider, which would increase the client's ability to obtain employment or upskill at their current job. The clients will be able to decide on the training and career track utilizing Labor Market Information provided to them as well as guidance provided by their assigned career coach.

Describe how the AJC(s) in the local area 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.

The Board recommends using the Maryland Workforce Exchange (MWE) program to track WIOA funded activities and outcomes. The Office of Compliance conducts regular trainings for staff on various aspects and policies of MWE utilization. In addition, staff participate in trainings and webinars on this topic administered by the State.

It is also very important to make sure that activities of mandatory and non-mandatory partners are included in the database. They will be provided with the limited level access to the participant records and given an opportunity to record some activities through setting up generic programs. At this point, MDOL is using the program to track Wagner-Peyser clients; access to Division of Rehabilitation Services (DORS) and Anne Arundel Community College (AACC) staff is being discussed.

Describe the Local Board's process for conducting oversight and monitoring of its WIOA activities and those of its subgrantee and contractors.

The Board created a "Quality Assurance Guidelines" policy that describes these procedures (see Attachment 5 – "Quality Assurance Guidelines" Policy).

Describe the Local 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.

In accordance with Federal and State Law, individuals applying for the Workforce Innovation and Opportunity Act or other funded services must be provided an opportunity to submit written authorization allowing the service provider to share their personal and confidential information and records. Each individual must also be informed that they can request their personal and confidential information not be shared among the partner agencies of the workforce system and this request does not affect their eligibility for services. If an individual declines to share their

personal and confidential information and is eligible for and receives services, the Board will work with the State to identify a pseudonym to document the participant's program services.

The Board adopted a policy on handling PII (see Attachment 6 – Personally Identifiable Information (PII) Policy).

Describe the Local Board's procurement system, and how the Board will assure its procedures conform to the standards in USDOL regulations. Include details on how the Local 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)

AAWDC is in compliance with the 29CRF Part 95, Part 97 and 2 CFR 200.

- As a non-profit 501(c) organization, AAWDC has established procurement regulations that meet the requirements of Anne Arundel County and all Federal requirements delineated below. These regulations have been reviewed by AAWDC's attorney and approved by the AAWDC Corporate Board of Directors (CBOD).
- AAWDC Procurements will comply with WIOA and WIOA Final Rules, when published, as well as standards established by the State. Property contracts will adhere to Property Management Procedures taken from the Office of Management and Budget, OMB Circular 2 CFR 200 Uniform Administrative Guidance. Major service providers will be selected by utilizing the Competitive Bid or Request for Proposal formats. Selection of all service providers will be based on the vendor's ability to demonstrate prior effectiveness in the performance standard goals; provide fiscal accountability and cost effectiveness; and serve the targeted population. Proper consideration shall be given to the community-based organizations based on cost, quality of training, characteristics of participants, and meeting performance goals.
- Sole-source contract may be necessary for services not available by multiple vendors or by vendor ability/knowledge to perform necessary service. Sole-source procurements will be justified in accordance with the criteria in 2CFR 200.
- Duplication of services or facilities available from federal, state, or local funds will not occur unless it can be demonstrated that alternative services or facilities are more effective or contribute to the achievement of the Anne Arundel County Workforce Development Area's goals.
- Local Education Agencies will be given the opportunity to provide services unless it is demonstrated that alternative agencies would have a greater potential to enhance the participant's occupational and career growth.
- AAWDC will not fund any skills training unless the level of skills provided in the program is in accordance with any guidelines which may have been established by the Board.
- AAWDC and the Board agree to adhere to a code of conduct and procedures to avoid conflict of interest, or the appearance of such conflict, in the exercise of their responsibilities, particularly those relating to the awarding of contracts. All members of the Board and the AAWDC Corporate Board of Directors (CBOD) must sign a Conflict-of-Interest Statement as a condition of their continued membership. The standards governing the conduct and performance of members of the Board (as noted on its by-laws), its officers and staff, AAWDC CBOD members and authorized agents who are engaged in the procurement of goods and services using federal funds. Except as

otherwise permitted or provided by federal, state, or local laws, rules, and regulations, the following provisions shall apply:

- The Board members, AAWDC CBOD members or AAWDC employees will not be permitted to participate in the selection or award of a contract supported by federal or state funds if there is an apparent conflict of interest.
- The Board members, AAWDC CBOD members or AAWDC employees will not be permitted to solicit or accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to any agreement, or to accept gratuities, favors, or anything of a monetary value in excess of $35.00 from contributors, etc.
- The Board members, AAWDC CBOD members or AAWDC employees will not be permitted to use any knowledge gained through their position for personal profit or the profit of family or associates.
- Conflict of interest standards cover Board members, AAWDC CBOD members, or AAWDC employees who are involved on the procurement process in which their relationship to the award recipient could be categorized as:
  - ο The member, officer, employee or authorized agent:
  - ο Any member of his/her immediate family;
  - ο His/her business partner;
  - ο Any organization which he/she belongs to or that employs any of the above, or has a financial interest in the firm being considered for an award.

These internal regulations define the levels of procurement and the different requirements of competition for each level.

The procurement process is as follows and will be outlined in the procurement policy (Attachment 4 – Procurement Policy):

A. For large procurements, RFP's are developed, widely issued, advertised when necessary, proposer conferences are held, proposals are rated and ranked based on established, know criteria and the best proposer is objectively selected;
B. For more routine purchases, needs are identified by initiative director/authorized staff;
C. The level of approval and requirements for competition as defined by procurement regulations are assessed by the initiative director;
D. Criteria in the procurement regulations are applied and when necessary, competing prices are determined via catalog, internet, or telephone as appropriate; at least three prices for equivalent items are entered on the form designed for this purpose including the recommended source;
E. The initiative director reviews the proposed purchase to determine if the item is a valid program need, if the competitive prices are sufficient and if the recommended source is appropriate; if so, the initiative director will verify that the contractor/vendor is in good standing with the Federal Government and the State; this is done through SAM and SDAT;
F. If so, the signed approved fiscal request form and backup documentation is forwarded to the fiscal unit for the order to be placed.
G. For routine office supplies, purchases are approved by the initiative director and sent to the fiscal unit to be ordered. Orders are sent directly to the office needing the supplies and a staff member at the office will verify the order was completely received by signing off on the shipping invoice and/or responding to the fiscal unit by e-mail that the order was received and complete.

Describe the 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)

The Board utilizes AAWDC's Asset Management and Inventory policy, which describes how acquired assets are managed, inventoried, and how these items are disposed when at the end of life.

Describe the policies or 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 Board includes this as part of the procurement policy (see Attachment 4 – Procurement Policy).

Describe the Local Board or fiscal agent's accounting procedures, including the procedures used in preparing reports to the State. (Refer to Local Plan Guidance)

The primary accounting system is Sage Intacct Premier, supplemented by Excel spreadsheets as needed. Each grant and each cost pool are assigned a 'class' in the accounting system and an excel budget to actual report is set up according to the approved spending plan. All vendor invoices are approved by the initiative director before being entered into the accounting system for tracking/payment/reporting where each expense is assigned to the class associated with the appropriate grant or cost pool. The Director of Finance reviews each expense posting to the accounting system and the President reviews each expense when the cash is disbursed. Payroll is reviewed by the Director of Finance & President to ensure staff charging time to grants aligns with the staffing plan. Summary reports of expenses by grant are reviewed by the initiative director and Director of Finance monthly to ensure costs are properly assigned and do not exceed funding levels and the President reviews these reports at least quarterly.

Obligations are tracked on Excel worksheets designed to capture every contract or other commitment. Reports are prepared monthly to track the progress of grants and prevent over-commitment.

Assets with an expected useful life of at least one year are tagged with a sticker and logged on an Excel worksheet with their value, description, and location. This list is updated as items are acquired or disposed of, with a full review every other year. In addition to the above, assets valued over $5,000 are recorded as fixed assets in the accounting system and depreciated over the course of their expected useful life.

Permits the tracking of program income, stand-in costs, and leveraged funds.

The primary accounting system, Sage Intacct, has several revenue "accounts": some that are used for the grants and others that would be used for program income. If a grant program generated income, the inflow of resources would be assigned to the class associated with the

grant and with one of these program income accounts. This would allow the income and costs to be associated and for reporting to the granter.

Leveraged funds are first budgeted in the Excel budget and budget-to-actual tools to point towards the class where they will be funded.

Stand-in costs are initially charged to the grant and then removed to another funding source with a flag in the Excel reporting tool pointing towards the new location of the cost.

To support reporting, stand-in costs and leveraged funds are associated with one of two specific classes in the primary accounting system and a comment is inserted associating them with the grant being leveraged or potentially needing the stand-in cost to make the costs easier to find and add to the Excel tools.

Is adequate to prepare financial reports required by the State

State fiscal reporting requires tracking costs on the bases of budgets, cash disbursements, accruals, and obligations. Each grant has an Excel budget which may be broken down by cost center and is also consolidated on a corporate basis. These budgets tie to our internal chart of accounts but contain a "cross-walk" that ties to the State's reporting categories to simplify reporting. The primary accounting system has automated reporting for both cash and accrual basis costs. For accrual basis numbers, we also enter monthly accruals for unbilled costs that have been earned based on our obligation tracking system. Obligations are tracked on several obligation Excel or Google spreadsheets which are customized for the types of agreements creating the obligation.

Provide a list of key staff who work with WIOA funds.

WIOA funds are managed by a team consisting of the President & CEO and members of the Executive Team including the Director of Finance and spending requests may come from staff directly involved in providing services funded through WIOA.

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

The fiscal agent's system can produce reports down to the transactional level by grant and by budget line item. Detailed backup is retained for at least two years on site, allowing auditors and monitors to trace use of funds from the state reports to the accounting system to the approved source document. This system is framed by internal controls that include qualified staff, compliance training, policies & procedures, segregation of duties, and internal reviews by multiple staff of WIOA spending.

Provide a brief description of the following:

Fiscal reporting system

The financial reporting system is a combination of a well-established, multi-user accounting system (Sage Intacct) supplemented by linking spreadsheets and a third-party payroll processor (Paylocity) providing payroll reports and online timesheets.

Sage Intacct is a cloud-based accounting software that provides comprehensive financial management features like accounts payable/receivable, cash management, general ledger, and robust reporting tools, allowing users to gain real-time insights into their finances and automate processes for streamlined operations.

Paylocity is a cloud-based payroll and human capital management (HCM) software designed to streamline workforce management. It provides tools for payroll processing, time and attendance tracking, benefits administration, talent management, and employee self-service. Its integration with Sage Intacct and Excel ensures that payroll data is aligned with financial records and supports comprehensive budgeting and reporting.

Obligation control system

Training Obligations
- **Recommendation**: Training obligations are recommended by Career Coaches.
- **Approval**: The initiative director reviews and approves the recommendation, ensuring the training aligns with program goals and fits within the program budget.
- **Documentation**: Once approved, the obligating document is forwarded to the fiscal office for validation and tracking.

Other Obligations
- **Contracts and Sub-Grants:**
  - o Requested by the initiative director.
  - o Prepared in the fiscal office.
  - o Signed by the President & CEO.

Control Systems
- **Obligations are managed and tracked using the following tools:**
  - o **Airtable**: Lists each obligation separately and provided documentation (Contracts, Invoices, FOCOS, Rosters, etc.)
  - o **Sage Intacct Commitment Module**: Supports tracking and reporting of obligations, including the calculation of month-end accruals.

Regular Review Process
- **Both Airtable and Sage Intacct are reviewed at least monthly with the Program Manager to:**
  - o Verify the completeness of obligations.
  - o Identify amounts that need to be de-obligated.

Purpose
- **This process ensures:**
  - o Alignment of obligations with program goals and budgets.
  - o Accurate tracking and reporting of financial commitments.
  - o Regular review to maintain fiscal responsibility and compliance.

ITA payment system

This process ensures accuracy and compliance with the terms of the Individualized Training Account :
Submission: Invoices/bills for the training are sent directly to the fiscal department and uploaded to the Airtable for program managers review and approval.

Review Process: The fiscal department reviews the document in accordance with the terms of the Individualized Training Account (ITA). The review ensures:
- The ITA has been signed by both parties.
- The bill amount does not exceed the ITA amount.
- Client information is correct.
- Outcome documentation corresponds to the training listed on the original ITA

Documentation Handling: Copies of the outcome documentation are sent to the program to be placed in the client file.

Chart of account system

The chart of accounts is well-structured and compliant with Generally Accepted Accounting Principles (GAAP). Its detailed classifications allow for clear separation of:
- Assets and Liabilities: Properly categorized to ensure financial stability and transparency.
- Direct Program Costs: Divided into every category mandated by the state for precise tracking and reporting.
- Indirect Administrative Costs: Allocated efficiently to meet grant and organizational requirements.

To simplify state reporting, the fiscal team employs a cross-walk system within the grant's Excel budget. This cross-walk consolidates multiple accounts into specific report line items, ensuring consistency and accuracy in compliance reporting.

Accounts payable system

When possible and practical, obligating documents such as contracts or Purchase Orders are created in advance of expenses being incurred.

After the service(s) is performed or materials purchased:

Invoice Submission: Vendors send invoices to invoices@aawdc.org.
Purchase Order Preparation:
- The Grant Manager prepares and uploads a Purchase Order (PO).
- Submits the PO to the Finance Team via Airtable.

Validation and Processing:
- The Director of Finance validates the invoices.
- The validated invoices are submitted to the Accountant for processing.

Accounting System Entry:
- The invoice is entered into the accounting system.
- Charges are assigned to the appropriate grant and chart of accounts line based on the budget.

Reimbursement and Payment:
- Reimbursement is requested.
- **Aged invoices**: Paid no later than three days after reimbursement is received.
- **Immediate payment invoices**: Paid immediately when necessary.

This workflow ensures accountability, proper budget allocation, and adherence to reimbursement timelines.

Check Writing – A payment is processed based on due dates or reimbursement received from the state.
Preparation:
- The Director of Finance retrieves the required number of blank checks from a locked cabinet located in the Chief Financial Officer's office.

Check Printing:
- Checks are printed using the Sage Intacct bill-pay feature.

Sequential Review:
- All checks (printed, manual, unused, or voided) are periodically reviewed to ensure sequential accountability.

Approval Process:
- All checks are reviewed and signed by the President/CEO.
  - For checks exceeding $10,000, two signatures are required.

Final Steps:
- Signed checks are returned to the Director of Finance.
- The Accountant handles mailing and filing.

This process ensures financial control, accountability, and adherence to organizational policies.

Staff Payroll system

Staff payroll, Participant payroll, and participant stipends are managed using a commercial third-party payroll service provider (Paylocity).
System and Management:
- Staff payroll is managed by the Human Resources Department in collaboration with the Director of Finance using Paylocity, a commercial third-party payroll service provider.
- Paylocity handles payroll calculations, tax filings, employer taxes, quarterly reports, and data backup.

Direct Deposit:
- **Direct deposit** to a financial institution is mandatory for all employees as a condition of employment.

Timesheet Submission and Approval:
- Employees enter attendance, hours worked, and grant/program served daily into online timesheets for a two-week period.
- At the end of the pay period:
  - Timesheets are electronically signed by employees.
  - Immediate supervisors review and approve timesheets.
  - The fiscal unit verifies submission for all employees.

Pre-Processing Review:
- A pre-process payroll register is printed and reviewed by the Director of Finance to ensure accuracy.
- Upon approval, the payroll file is released to Paylocity for processing.

Payroll Provider Responsibilities:
- Paylocity calculates wages, disburses payroll, and files necessary tax forms and deposits.

Post-Processing Review and Reporting:
- Detailed payroll reports are printed and reviewed by the Director of Finance for compliance with the staffing plan.
- The Accountant uses these reports to allocate payroll costs by grant program in the accounting system, which is verified by the Director of Finance.

Participant Payroll and Stipend System

Participant Payoll and Stipends are paid in a separate payroll account using a separate program/organization code. Procedures above otherwise apply.

Youth Programs
- For youth programs (e.g., summer jobs), stipends/wages are paid from a separate payroll account using a dedicated program/organization code.
- All procedures from the staff payroll system apply unless otherwise noted.

Participant Stipend payment system
Stipend Recommendations:
- Stipend payments are initiated based on recommendations from **Career Coaches** aligned with specific program requirements.
- Stipend checks are processed through Paylocity payroll system.

Describe the Local Board's (or fiscal agent's) cash management system and how it will assure that no excess cash will be kept on hand, and that procedures are in place to monitor cash.

This process demonstrates a structured approach to managing cash flow and ensuring timely payments. Here's a summary of the key elements:

Cash Reimbursement Requests:

Submitted to MDOL on a quarterly basis.
- Receivables are recorded in both the accounting system and an Excel cash forecast.

Fund Receipt Timelines:
- **WIOA Formula Funds**: Received from the County ~30 days after the request.
- **Non-Formula Funds**: Received from MDOL ~21 days after the request.

Cost Projections:
- Based on a trailing three-month burn rate for payroll and recurring costs (rent, utilities, etc.).
- Projections include expected fund receipt times to anticipate cash needs.

Grant-Specific Financial Planning:
- Projections incorporate grant cash disbursements and aged invoices tied to the grant.
- Aim: Prevent excessive negative cash on hand (disbursements exceeding receipts).

Aged Payables Management:
- Payables are flagged by their associated cash requests.
- Ensures checks can be issued within three business days of receiving funds.

This strategy minimizes the risk of cash shortfalls and ensures compliance with payment obligations.

Describe of the Local Board's cost allocation procedures including:

Identification of different cost pools

Whenever possible, costs are charged directly to the appropriate grant program. Specific transactions are directly split between grants/programs when more than one program benefits.

For cases where direct charging is not possible, there are two cost pools to capture costs that are subsequently allocated out to the programs. The Program Cost Pool captures costs that benefit both the WIOA Adult and WIOA Dislocated Worker Programs and is primarily costs related to the management of the Career Center, which benefits everyone who walks in the door regardless of how they are enrolled. The Executive and Administrative Cost Pool captures costs that benefit all programs, such as the corporate administration function including Accounting, Human Resources, and the office of the President & CEO.

Procedures for distribution of staff costs between cost categories (Administrative cost, program cost and indirect cost).

Staff charge their time on the bi-weekly timesheets to the grant(s)/program(s) on which they work or to the indirect pool. The payroll system generates a labor distribution report that subtotals costs per grant and pool. Costs are entered into the accounting system by grant/cost pool according to the share of their actual labor cost based on their timesheets.

Procedures used for distribution of funds from each cost pool.

The program cost pool is allocated on a quarterly basis to the WIOA Adult and Dislocated Worker grants based on the percentage of new clients enrolled as Adults and Dislocated Workers during the same quarter. The Executive and Administrative Cost Pool is allocated equally to all programs based on direct costs, to the limit of the lesser of the grant approved rate or our Federal approved indirect rate.

Description of funds included in each cost pool.

Program Cost Pool – The operations of the WIOA Adult and Dislocated Worker grants are closely related and share a number of resources including staff, facilities, equipment, and supplies. In the cases where these costs cannot be easily identified as associated with one or the other grant, they are included in this pool.

Executive and Administrative Cost Pool – The cost of operating the corporate headquarters, including facilities, certain executive salaries, all fiscal costs and human resources costs are included in this pool and shared as indirect by all programs.

Description of cost allocation plans for AJCs

Facilities and shared staff (per the RSA) costs for Career Centers are first divided amongst participating partners on the basis of square footage, and then between WIOA Adult and Dislocated Worker based on the Program Cost Pool plan described above. If any other grant programs worked out of the Career Centers, their facilities costs would be allocated to that program based on square feet directly used. Supplies and personnel-driven charges would be allocated based on headcount.

Describe the Local Board's (or fiscal agent's) procedure for collecting debts involving WIOA funds.

The fiscal agent's accounting department invoices and follows up on late invoices on a bi-monthly basis.

ANNE ARUNDEL
WORKFORCE DEVELOPMENT
CORPORATION

Policy Memorandum 2022-05

Occupational Training Services – Effective December 1, 2021

INTENDED AUDIENCE:	AAWDC staff and subgrantees
SUBJECT:	Providing Certain Occupational Training Service to Participants in Workforce Development Initiatives
PURPOSE:	To provide policy guidance on providing occupational training services to participants
POLICY CONTACT:	Milena Kornyl VP, Career Development and Community Services, AAWDC Tracey J. Brooks Performance and Compliance Manager, AAWDC

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Revision History

Policy Number	Date of Revision	Significant Change
2020-07	10/1/2019	Initial guidance

Approvals

Kirkland J. Murray

President and CEO   Kirkland J. Murray (Dec 1, 2021 06:19 EST)

Policy Statement

Anne Arundel Workforce Development Corporation (AAWDC) will provide training to qualified participants who meet the requirements for training services as enumerated in this policy. At all times, it is understood by staff and participants that training services are not an entitlement and are subject to funding limits, availability of such funding, and any special grant considerations that apply.

Eligibility for training services is determined by the terms of the grants AAWDC administers. This policy communicates AAWDC's standards, derived from the U.S. Department of Labor Training and Guidance Letter (TEGL) 19-16. Individual grants may establish more restrictive requirements.

The standards are:

1. It must be determined that the participant is unlikely to obtain/retain employment through career services alone. Employment should lead to a family-sustaining wage or place the participant on a pathway to a family-sustaining wage.
2. The participant will be able to obtain/retain employment through participation in some form of training. Participants must be assessed as suitable for the training, likely to obtain/retain employment and demonstrate a need for training.
3. Additionally, the participant must be able to succeed at the training. This means that the participant has the necessary knowledge and skills, and that barrier mitigation and removal services will allow the participant to attend training.
4. The training program must be in an area of need in the region. Need may be demonstrated by identifying the occupation or industry in the array of high-growth industries in the local area or through coordination with an employer who can provide a bona fide job offer to the participant.
5. The participant must coordinate funding for training with other sources as described below.
6. The participant must meet any service priority guidelines that are in effect for the funding source.

Other Requirements

Coordination of Funds

20 CFR 680.230 states that workforce development training funds must be coordinated with other funding sources, including the participant's own funds. This includes, but is not limited to, training funds available through:

- Temporary Cash Assistance (TCA), Supplemental Nutrition Assistance Program (SNAP), and other federal welfare benefit programs
- Title IV programs, such as Pell grants or Federal Work-Study
- State or local educational grants

These funds must be utilized prior to the expenditure of training funds. Participants may select training programs that exceed the maximum amount available to training when other funding sources are available to supplement.

Means-Testing

In addition to coordinating funding sources to reduce the burden on a grant's training funds, AAWDC reserves the right to utilize means-testing. Means-testing determines whether a participant is eligible for training services based upon the participant's ability to do without the help. Generally, means-testing will take the form of cost-sharing between AAWDC and the participant.

AAWDC will utilize priority of service determinations in cases where means testing is to be used. Training funds shall be available on the following basis:

- *First and Second Priority* – up to 100% of qualifying training costs
- *Third Priority* – up to 80% of qualifying training costs
- *Fourth Priority* – up to 70% of qualifying training costs
- *Fifth Priority* – up to 50% of qualifying training costs

A qualifying training cost is defined as tuition, books, and other fees (such as labs or tests) necessary for the successful completion of the training.

Modes of Training

AAWDC utilizes two training modes: individual training accounts (ITAs) and cohort.

ITAs are the standard method of funding training services. An ITA is defined as a three-part agreement between AAWDC, the participant, and the training provider to pay for a participant's training. While the term account is used, there is no money reserved in the participant's name beyond the amount listed on the ITA. Each time that a participant requests training, they must meet the standards enumerated above.

AAWDC can pursue cohort training for in-demand industries or occupations and may do so when such trainings are in the interest of AAWDC and/or employers in the county. Cohort trainings may not be used to limit customer choice. Staff can offer an upcoming cohort training to a participant as one of the options for training services. The participant may be select the cohort training or may choose to pursue training through an ITA.

Eligible Training Provider List (ETPL)

The Maryland Department of Labor maintains a list of eligible training providers and the programs they provide. Training programs must be selected from this list for training offered under Title I of the Workforce Innovation and Opportunity Act (WIOA). To be eligible for training, both the provider and the program must be on the ETPL. Case managers will print off the selected program and provider from https://www.dllr.state.md.us/employment/train/. The printout should be placed in the participant file.

(NOTE: Per MD Labor Policy Issuance 2021-11, the requirements to use a provider from the ETPL apply only to Subpart B programs, meaning Title I Adult and Dislocated Worker programs only.)

Occupational Testing

Many occupational trainings require the passage of an exam to obtain credentialing. AAWDC will pay for a participant to sit for an exam as a training expense. The participant must sit for the exam within 30 days (or the next available exam, if there are no seats within the 30-day window). Should the participant not meet this requirement, AAWDC reserves the right to make the participant pay the training and/or exam cost.

AAWDC shall, at its sole discretion, pay for one retake exam for participants who fail to pass an occupational exam. When deciding, case managers shall consider:

- Likelihood of success in a retake
- Cost of exam retake
- Participant attitude and characteristics
- Job readiness and employment prospects

Exam retakes should be processed separately as a third-party payment request. The participant must sit for the exam within 60 days of the first exam.

Failure to Complete Training or Sit for an Exam

Participants who do not complete training are not eligible to receive further training services for three years. Exceptions may be made for extraordinary circumstances beyond the participant's control and must be approved by the Vice President, Career Development and Community Services. Additionally, participants may be required to refund AAWDC for any training costs and expenses incurred on behalf of the participant.

Covered Trainings

This policy applies to the following types of training:

- *Occupational skills training* – An organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by a certain occupation field. Such programs are outcome-oriented, at least three days in length, and lead to attaining a recognized industry credential.
- *Pre-apprenticeship* – A program or set of services designed to prepare individuals to enter and succeed in an apprenticeship program. Such a program must have at least one documented relationship with a Registered Apprenticeship program. Pre-apprenticeships help individuals meet the entry requirements for apprenticeship programs and ensure that they are prepared to be successful.

- *Registered Apprenticeship* – An employer-driven occupational training model which provides on-the-job learning from an experienced mentor and related classroom instruction on the technical and academic aspects of the job.

Related Policies and Other Resources

<u>Law</u>

- *Workforce Innovation and Opportunity Act of 2014*, 29 U.S.C. §§ 3101 et seq.

<u>Regulatory Guidance</u>

- *Code of Federal Regulations, 20 CFR 680 Subpart B,* Training Services

<u>U.S. Department of Labor Guidance</u>

- Training and Employment Guidance Letter (TEGL) 19-16, "Guidance on Services provided through the Adult and Dislocated Worker Program under the Workforce Innovation and Opportunity Act and Wagner Peyser, as amended by WIOA Title III, Under the WIOA Final Rule," dated March 1, 2017.

<u>Maryland Department of Labor Guidance</u>

- Policy Issuance 2021-11, "WIOA Title I Am training and Maryland's Eligible Training Provider List," dated July 29, 2021

Occupational Training Services - Final Draft

Final Audit Report   2021-12-01

Created:	2021-11-30
By:	Jason Papanikolas (jpapanikolas@aawdc.org)
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ANNE ARUNDEL
WORKFORCE DEVELOPMENT
CORPORATION

Policy Memorandum 2022-02

WIOA Adult and Dislocated Worker Priority of Service – Effective October 6, 2021

INTENDED AUDIENCE:	Title I staff and managers, Anne Arundel County Career Center staff and managers, local area partners who utilize Title I Adult and Dislocated Worker services
SUBJECT:	Utilizing Priority of Service under Title I of the Workforce Innovation and Opportunity Act (WIOA)
PURPOSE:	To provide policy guidance on AAWDC's expectations and requirements for WIOA Title I Adult and Dislocated Worker program priority of service requirements to case management and other partner staff
POLICY CONTACT:	Tracey J. Brooks Performance and Compliance Manager, AAWDC

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Revision History

Policy Number	Date of Revision	Significant Change
2018-01	8/1/2017	Incorporated updated U.S. Department of Labor guidance
2017-03	12/1/2016	Incorporated new Maryland Department of Labor guidance
2016-03	7/1/2015	Initial Title I Adult program eligibility and priority of service requirements under WIOA

Approvals

Kirkland J. Murray

President and CEO   Kirkland J. Murray (Oct 5, 2021 11:50 EDT)

Policy Statement

Anne Arundel Workforce Development Corporation is committed to a priority service system where those individuals most in need, with additional barriers to employment, will be served first. The Workforce Innovation and Opportunity Act (WIOA) requires priority be given to public assistance recipients, other low-income individuals and individuals who are basic skills deficient, when providing individualized career services and training services using WIOA Title I Adult program funds. In addition, Training and Employment Guidance Letter (TEGL) No. 19-16 specifies that priority should also be applied to individuals that are both underemployed and low-income. WIOA provides a focus on serving individuals with barriers to employment, and the intent of this priority in the law is to ensure access to these populations on a priority basis.

In order for a participant to receive priority of service, the participant must meet the statutory definition of the eligibility requirement. These requirements are enumerated in Policy Memorandum 2021-04 *WIOA Title I Eligibility*. Priority of service can be defined in many ways, but generally means that a participant with a service priority will receive services before a person lacking that priority. In other words, priority participants are served *first*. When resources are limited, the Board may, at its discretion, choose to serve only those participants with priority status.

Priority of Service in the Adult Worker Program

Within the Adult Worker program, the following priority service order must be followed:

Priority of Service for the WIOA Title I Adult Program	
First Priority	Veterans and eligible spouses who are low-income, recipients of public assistance, and/or basic skills deficient.
Second Priority	All other low-income individuals, recipients of public assistance, and/or those who are basic skills deficient.
Third Priority	Veterans and eligible spouse who do not meet "first priority" conditions.
Fourth Priority	Additional priority populations established by the Governor or Local Workforce Development Board
Fifth Priority	All other individuals who qualify for the Adult Worker program.

The State of Maryland and the Anne Arundel County Local Workforce Development Board have designated the following populations as "target populations", receiving fourth priority for purposes of the Title I Adult program[1]:

- A.L.I.C.E. Population (Working Poor)[2]
- Displaced Homemakers
- Eligible migrant and seasonal farmworkers (MSFWs)
- Ex-offenders
- Individuals facing substantial cultural barriers
- Individuals, including youth, with disabilities
- Individuals within two years of exhausting lifetime eligibility for TCA benefits
- Individuals who are English language learners
- Individuals who are unemployed, including the long-term unemployed
- Individuals without a High School Diploma
- Native Americans, Alaskan Natives, and Native Hawaiians
- Older individuals (50 years of age or older)
- Single parents (including single pregnant women and non-custodial parents)
- Underemployed[3]
- Youth who are in or have aged out of the foster care system

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[1] Adult Program Priority of Service applies to all Title I grants and other grants authorized under WIOA. Targeted populations may change based upon special requirements communicated in grant awards and other agreements.
[2] A.L.I.C.E. stands for Asset Limited, Income Constrained, Employed. It is an acronym developed by the United Way to describe the working poor – individuals who are employed, but are not able to make a living wage.
[3] AAWDC defines underemployed as "individuals who have obtained only episodic, short-term, or part-time employment, or who do not have a full-time job commensurate with the individual's level of education or demonstrated skills." Please note this definition is different from the underemployment standard for income used with Dislocated Workers.

Priority of service for adult workers is determined at the time of eligibility determination and enrollment. The priority category given to a participant will not change, even if a participant would move into a higher category based upon a significant life event.

Case managers/intake staff are responsible for making priority of service determinations using the AAWDC Priority of Service Form.

Priority of Service in the Dislocated Worker Program

If a participant who is a veteran meets the definition of a Dislocated Worker, then the participant should receive priority of service under the Dislocated Worker Program. As with the Adult program, priority of service is determined at the time of eligibility determination and enrollment. Priority participants should receive services first. However, once a priority participant has been enrolled into the Dislocated Worker Program, the participant shall receive services on an individualized basis. Therefore, the participant will not receive priority at that point except as otherwise enumerated in this policy.

Veterans are not required to document status at enrollment through anything other than self-certification. Case management and intake staff are encouraged to collect proof of veteran status as enumerated in the *WIOA Title I Eligibility* policy but cannot compel a participant to do so. Should a veteran utilize outside resources (such as occupational training), proof of veteran status must be collected at that time. For purposes of cohort training, veteran dislocated workers will receive priority consistent with Third Priority Adult workers as described above. Case managers are urged to consider co-enrolling veterans in both the Adult and Dislocated Worker Programs in order to ensure that veterans receive all benefits to which they are entitled under WIOA Title I.

Performance and Operational Considerations

Managers of Title I staff should be aware of the following considerations:

1. The State of Maryland has mandated that a minimum of 75% of Title I Adult participants shall qualify for one of the top two tiers of service priority. Title I funds should emphasize the use of the priority service tiers in determining training eligibility.

2. The following steps must be followed during intake to ensure that proper priority is given to participants:

    a. For veterans attesting to priority status, the participant shall receive first choice of appointment times with intake staff;

    b. For all priority service participants identified during the enrollment process, the participant shall receive first choice of appointment with a case manager;

    c. For cohort training, participants shall be admitted according to their service priority. Should a participant be denied access to a cohort on the basis of priority alone and subject to the availability of funds, the participant should be offered the opportunity to pursue training through an Individual Training Account (ITA) agreement.

Related Policies and Other Resources

Law

- *Workforce Innovation and Opportunity Act of 2014*, 29 U.S.C. §§ 3101 et seq.

Regulatory Guidance

- *Code of Federal Regulations, 20 CFR Subpart E,* Priority and Special Populations

U.S. Department of Labor Guidance

- Training and Employment Guidance Letter (TEGL) 19-16, "Guidance on Services provided through the Adult and Dislocated Worker Program under the Workforce Innovation and Opportunity Act and Wagner Peyser, as amended by WIOA Title III, Under the WIOA Final Rule," dated March 1, 2017.

Maryland Department of Labor Guidance

- Policy Issuance 2021-13, "Workforce Innovation and Opportunity Act (WIOA) Title I Adult and Dislocated Worker Program Eligibility," dated October 4, 2021

Local Area Resources

- Anne Arundel County Local Workforce Development Board Policy 2021-04, "Title I Eligibility," dated March 8, 2021

Priority of Services - Final Draft

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Case Management – Effective April 1, 2019

INTENDED AUDIENCE:	AAWDC staff and subgrantees who provide direct case management services to participants through the local workforce development system and regional grants managed by AAWDC
SUBJECT:	Case Management Policies and Guidelines
EXPIRATION:	N/A
QUESTIONS:	Jason W. Papanikolas, MBA Policy and Compliance Analyst 410-424-3250 jpapanikolas@aawdc.org

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CANCELLATIONS

This policy supersedes and replaces any local conventions in effect by AAWDC initiatives or administrative offices.

The following policies are replaced by this guidance:

2013-03	Case Management Policy
2017-07	IEP Policy
2016-AJC-06	WIOA Enrollment and Exit Policies

STANDARD OPERATING PROCEDURES

Initiative-specific Enrollment Process
Initiative-specific Case Closure Process

FORMS

Tool – Initiative-specific Case Management Service Map
Tool – AAWDC Assessment Tools and Diagnostic Tests

Approvals

President and CEO, AAWDC

General Information

The initiatives and grants that the Anne Arundel Workforce Development Corporation (AAWDC) manages require case management staff to interact with individuals to assess knowledge, skills, and abilities, along with vocational interests and suitability. To accomplish this, case management staff need to adequately listen and respond appropriately to participants, providing them access to resources, tools, and skills to help them obtain and retain employment, remove or mitigate barriers, and document activities associated with these steps. Case managers not only need to be able to help their participants and achieve programmatic outcomes; a case manager needs to be able to tell the story of that participant's time in an initiative or grant.

AAWDC has developed a customer-centric model that places the participant at the center of the service delivery system. A customer-centric model is intended to ensure and document that case management staff are delivering services that

- Prepare the participant to successfully attain employment at a family-sustaining wage through the development of a comprehensive employment plan;
- Enable the participant to identify and achieve realistic goals and facilitate job search skills through career assessment and counseling, job and interview preparation skills, and the development of appropriate job opportunities;
- Mitigate, to the extent possible, real or perceived barriers to employment using career counseling, supportive services, and appropriate training to reduce the amount of time that a participant is unemployed or underemployed; and
- Provide reasonable follow-up services to assist a participant in retaining employment.

Case Management Standards

As a company, AAWDC has established the following standards for case management.

1. *Participation and Enrollment* – A customer does not become a program participant until the customer meets all the criteria for enrollment specified in the grant or by a monitoring agency. For a customer to remain a participant, case managers must meet and provide services for the customer at least monthly.
2. *Individual Employment Plan* – All participants must have an Individual Employment Plan (IEP). The purpose of the IEP is to provide a guidepost of goals and objectives that case managers and participants will jointly work towards. All services provided to a participant must link back to the IEP and IEPs must be reviewed at least quarterly and changes made accordingly.
3. *Provide Services* – Case management staff should document both activities and services with case notes. The rule of thumb is that all services are activities, but not all activities can be services. The distinction lies in the amount and quality of the interaction between the participant and the case manager. In general, a phone call (i.e., scheduling/confirming an appointment), e-mail, or case management activity (such as the completion of paperwork) does not qualify as a service.
4. *Data Entry* – It is incumbent upon staff to ensure that case notes, services, and outcomes are entered in a timely fashion. AAWDC requires that all case notes must be completed within two business days and all other data entry must be completed in the relevant reporting system within five business days of the actual activity or service date.
5. *Case Closure and Participant Exit* – Case closure and exit processes are program management issues. Program managers should design and document a procedure that allows for the proper tracking of participants and outcomes once the participant has completed a program.

Additionally, effective case management has the following characteristics:

- Services meet the participants where they are. This means that participants receive services that are tailored to their needs, abilities, skills, and interests as well as to opportunities and supports available in the local area.
- A customer-centric case management philosophy requires that case managers be active listeners who can assist participants in crucial decision-making and in meeting milestones.
- Case management staff should be specialists with a high degree of knowledge relating to occupations, job openings, training programs.
- Coordination of services with partner agencies should be easy and straight-forward for the participant. This requires that the case manager has a good working knowledge of the various agencies and programs in the local

community and how to refer participants to those programs. Wherever possible, a warm handoff should be conducted.

These standards shall inform customer flow and case management practices for all AAWDC initiatives.

Guidance on Services during Participation

Staff must only record services that have truly been provided to participants and should reflect the goals in the participant's IEP. **Staff may not add services solely to keep a participant active or delay program exit.** All services should only be open for one day, unless a valid reason exists to do otherwise. When staff leave a service open for more than one day, the staff member is indicating that the service was received continuously (i.e. every day) during the period. There are three exceptions to this rule:

1. *Training Services* – Due to the nature of training, a participant can receive the service continuously without being in class every day of the week. Therefore, it is acceptable for training services to be open for multiple days. AAWDC requires that the projected begin date and projected end date of a training service match the documentation in the participant file. If the actual begin and/or end date differs from the projected dates, a case note explaining the discrepancy must be created.

2. *Supportive Services* – Often linked to training, a participant is assumed to be receiving the benefit of the service even when not directly receiving it. For example, a participant who receives a gas card to assist with transportation does not only benefit on the date that he/she physically receives the card (i.e. the date the service is performed), he/she also receives a benefit during the period covered by the card. Therefore, it is appropriate to leave a supportive service open for multiple days. It is also important to note that supportive services are not standalone services. In other words, supportive services are provided in conjunction with other services. For more information, please see the *Supportive Service Policy Memorandum.*

3. *Gap in Service* – The regulations and grant agreements governing AAWDC initiatives often allow for certain gaps in service. A gap in service is appropriate when a participant is waiting for the start of training and has no other objectives or goals in his/her IEP or when a participant has a short-term medical issue. Other allowable reasons for a gap in service may exist, depending on the initiative. A gap in service requires the permission of the Office of Research, Performance and Compliance (RPC Office) *prior* to the gap occurring. Approval is given for 90 days, renewable for an additional 90-day period.

AAWDC will create a case management service map for each initiative. This service map provides a list of recommended service code for case managers to use. Compliance staff will review non-standard service codes to ensure that the service is proper, necessary, and fully documented.

Enrollment in a Program

Staff shall utilize a process for enrollment into a program. Each initiative will establish a Standard Operating Procedure. The process must take into account the following:

1. *Program Eligibility* – A participant must meet all requirements for eligibility, including providing all necessary proof of eligibility (as established by the grantor). At a minimum, AAWDC requires that a participant:
   a. Is eligible to work in the United States;
   b. Be a resident of Anne Arundel County (unless otherwise waived by the grantor); or
   c. Have a bona fide job offer from an Anne Arundel County employer.

2. *Program Suitability* – All participants must be assessed for suitability. In general, suitability is defined as a process of discerning a pathway of services and supports that is reasonable and appropriate for the participant, is within the scope and means of the initiative, and to which both the case manager and the participant can agree. It is imperative that staff remember that workforce funding is limited, and participation is not an entitlement.

3. *Provision of Services* – A participant is not considered enrolled until staff provide an actual service to the participant. AAWDC does not define the initial service requirements, unless established by the grantor.

Exit from Program

Staff shall utilize a Case Closure process. This process will be established by a Standard Operating Procedure for each initiative. AAWDC requires that initiatives **actively manage their case closure and soft exit process to ensure that participants are purposefully exited.** There are three types of case closure:

1. *Program Completion* – Once a participant has completed all of the goals on the IEP, it is appropriate to exit the participant. This should be considered a "successful outcome." The participant has gained employment and completed any training courses associated with their IEP. NOTE: The participant need not have gained a credential to close and exit a participant.

2. *Accountability Exit* – An accountability exit occurs when a participant drops out of the program, but the initiative must still report on outcomes on the participant. Accountability exits can occur for many reasons, including:
   - The participant retires.
   - The participant drops out of the labor force to care for a family member and this care is expected to last more than 90 days.
   - The participant moves from the area (unless the move is made to take a job).
   - The participant cannot be located or has refused to continue program.

3. *Exclusion from Reporting* – On occasion, something may happen with a participant that results in an extended absence from the labor force. In other words, a participant may no longer be able to search for a job. When this occurs (depending on the grantor), the initiative may be excused from collecting outcome data on the participant. This is called an Exclusion from Performance and typically occurs for the following reasons:
   - The participant is institutionalized in a jail, prison, or hospital and the period of institutionalization is expected to last more than 90 days.
   - The participant has a health issue or medical problem that precludes continued participation in the program and the medical condition is expected to last more than 90 days. (NOTE: staff may have the option to use a gap in service if the participant is uncertain about the duration of the issue.)
   - The participant dies.
   - The participant is a member of the National Guard or Armed Forces Reserve and has been called to active duty for more than 90 days.

Exclusions from performance must be case noted and approved by the RPC Office. An exclusion from performance can be granted at any point during participation or follow-up.

Individual Employment Plan (IEP)

AAWDC has adopted and refined the requirements for an IEP found in Maryland Department of Labor, Licensing and Regulation (DLLR) Policy Issuance 2014-03. The IEP is a living document that lays out an ongoing strategy between the participant and case manager. It identifies the participant's employment goals, appropriate objectives to achieve those goals, and the appropriate combination of services for those objectives. IEPs must meet the following standards:

1. *Assessment* – A comprehensive assessment of the participant must be completed. Comprehensive assessment is defined as an interview, evaluation, and/or testing process that can be used to identify appropriate employment goals, potential needs and barriers, and possible training certifications.

2. *Employment Goal* – The IEP must contain an employment goal intended to ensure that participants are being trained or receiving career services that will lead to self-sufficient wages and a high probability of success.

3. *Needs and Barriers* – Any potential needs and barriers (real or perceived) must be addressed in the IEP. Needs and barriers may include, but are not limited to:
   - Assistive technology needs
   - Supportive services
   - Occupational skills gaps
   - Job search skills, job readiness skills, and job retention skills

4. *Training Goals* – If training is needed for a participant, the training must be clearly identified, and the participant must be further evaluated for training services.

5. *Participant Involvement* – The participant must be actively involved in the IEP process. Case managers must demonstrate that the participant was involved with the development of his/her IEP by obtaining the participant's signature on the IEP.

6. *Regular Updates* – IEPs should be reviewed at least quarterly to ensure that goals and objectives continue to align with the participant's plan. Adjustments should be made as needed and documented.

AAWDC requires the use of SMART-VT goals in the IEP process. SMART goals are a management tool that allows for easier and more reliable case management of participants. SMART goals also make performance tracking and data validation easier for compliance staff

- *Specific* – If a goal is stated specifically, it will clarify who is to do what, when, how, where, and why (if applicable).
- *Measurable* – A goal should be written in such a way as to help measure when the goal is reached. The criteria should be explicit.
- *Attainable* – Goals should be reachable. Objectives can be used to break down larger goals into manageable chunks that are attainable.
- *Realistic* – Realistic means that the goals must reflect the reality of the job market and industry. It also means that the goal can be accomplished with the available resources.
- *Timely* – All goals must have a target date for completion. The target date should be reasonable and should take into consideration the motivation of the participant, the timeframe for any internal processes and procedures of AAWDC and any vendors, and the priority of the goal.
- *Verifiable* – Goals should be able to be verified by case notes or other appropriate documentation. Verification is required for compliance and data validation purposes.
- *Traceable* – Goals should be traceable, meaning that the goals established should track back to an assessment or other evidence available to a monitor that helps provide background and other intelligence.

Assessments

Participants are assessed at several points prior to and during program participation. These assessments are necessary to providing quality customer services and ensure that participant's services are both necessary and proper for their situation. Assessments are broken into several categories. As used in this policy, the term 'assessment' refers to the process of gathering information and discerning needs. It does not refer to any assessment tool or mechanism. Case managers are expected to use their best judgement as to which tools or mechanisms may be appropriate for a participant.

- *Initial Assessment* – This is a basic assessment of occupational abilities, interests, attitudes, job search readiness, and self-sufficiency. An initial assessment should check for basic program suitability and is often utilized at the time of referral to a program. The results of an initial assessment should be communicated through case notes or like method of communication
- *Basic Educational Skills and English Language Assessment* – This assessment determines the basic language and mathematical skills of participants. These assessments must follow the requirements specified in the *Basic Skills Deficiency Assessment* Board Directive. The results of these assessments are recorded in MWE.
- *Comprehensive Assessment* – This is an informal assessment of the participant's job readiness, aimed at identifying an employment goal, any supportive service needs, the participant's perceived barriers to employment, and any training goals. The results of a comprehensive assessment form the body of the IEP and should be included in the participant master file.
- *Training Assessment* – As detailed in the *Occupational Training Services* Policy Memorandum, a participant must be assessed for a determination of need and likelihood of success. Staff should also assess if the participant is eligible for other funding sources as detailed in the policy.
- *Job Readiness Assessment* – Assessing participants for job readiness is a part of most assessments. AAWDC, however, will conduct a job readiness assessment at the point that a participant begins the job development phase of a program. Such an assessment looks at the participant's needs and barriers to evaluate how well those have been mitigated. A job readiness assessment may also involve re-testing of prior tools and mechanisms for improvement. The results of this assessment should be communicated through case notes or like method of communication and made part of the participant master file.

Case Notes Guidance

Case notes should document the history of interaction between staff and the participant and should document what was done, by whom, and when. Case notes serve many important functions, including:

- Documenting activity between the case manager and participant for addressing and acting towards fulfilling the participant's vocational needs;
- Serving as a record of accountability on the part of the case manager and AAWDC;

- Providing continuity of service in the event of staffing changes;
- Recording details of services provided to a participant;
- Document the participant's involvement in activities and progress;
- Capturing nuances regarding factors affecting eligibility and other information of note;
- Providing justification for service provided;
- Providing a focal point for monitoring the progress and effectiveness of service delivery; and
- Protecting the case manager and AAWDC from potential legal issues.

Case notes should be entered for all services provided to and contact with the participant. Case notes should follow the BROCRIP structure. This structure encapsulates the seven elements of good case notes. While staff should endeavor to include all seven elements, there may be situations where some elements do not apply.

- *Background* – The initial case note should include a background statement that includes the context, setting, conditions, circumstances, and framework around which the interview was scheduled. Subsequent case notes only need a background statement if there has been a change in situation with the participant.
- *Reason* – A statement of purpose or rationale for the meeting. Each meeting should support the IEP and the goals, objectives, and services detailed therein.
- *Observations* – The case note should make note of factual observations as they relate to the participant during the meeting.
- *Content* – A summary of the meeting. Should be no more than two or three sentences.
- *Results* – A statement describing the outcome of the meeting or providing an evaluation of how well the meeting went, particularly in relation to the stated reason.
- *Impressions* – A statement of the customer's overall progress towards their goals.
- *Plans* – This should include the next steps. Including any assignments and who is responsible for them. You should also document when you will meet again, if appropriate.

Case Note Dos	Case Note Don'ts
DO Enter your case notes in real time. Remember, even with the best memory, we are likely to miss certain nuances and emphasize the wrong things the more time passes.	**DON'T Wait 60 days to enter case notes.** Every keystroke in MWE is logged, so monitors will assume that your case notes are being used to cover a gap in service or some other problem in the participant's record.
DO Summarize your meeting or contact. Case notes do not need to be War and Peace. Generally, no more than 4 to 6 sentences should be plenty to paint a picture of the participant and the meeting.	**DON'T Paste e-mail threads into your case notes.** Yes, it saves time for you as the case manager. However, threads don't tell a story! Only paste the relevant information from the e-mail into your case note.
DO Be consistent. Make sure that your case notes reflect the same information that is in the participant's master file.	**DON'T Leave gaps in time or information.** If you leave out information or have big gaps in time, you allow the monitor to draw his/her own conclusions
DO Be factual. As Joe Friday would say, "Just the facts." Be specific and factual when writing case notes. When you are concerned about confidential information, summarize and remain focused on how this information will affect the IEP.	**DON'T Be vague or give opinions.** Unless you are an expert in behavioral psychology, don't say a participant is depressed, etc. Likewise, don't use generalizations with your case notes.
DO Be a problem solver. Always suggest solutions to any issues that are identified during your meetings.	**DON'T Be a troublemaker.** Telling a monitor that the participant isn't making progress isn't helpful and makes the monitor wonder about the quality of services.
REMEMBER This is a legal document. Your case notes may end up being read out loud in a court of law. If you don't want the world to know it, then don't put it in writing.	**DON'T Use jargon.** Some abbreviations are unavoidable. Keep their use to a minimum.

ANNE ARUNDEL
WORKFORCE DEVELOPMENT
CORPORATION

Policy Memorandum 2023-04

Procurement and Contracting – Effective February 1, 2023

INTENDED AUDIENCE:	AAWDC finance staff, managers, and executives
SUBJECT:	Procurement Practices and Contracting Requirements
PURPOSE:	AAWDC is the county fiduciary for workforce development funds. As such, the organization has to ensure that funds are spent in the program's best interest and consistent with the grantor's requirements. This policy was created to balance the need to procure effective, high-quality goods and services with best-value efficiency and published goals of the grantor.
POLICY CONTACT:	Director of Finance

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Revision History

Policy Number	Date of Revision	Significant Change
2020-11 – Procurement and Contracting	2/1/2020	To establish acceptable and best practices in procurement and contracting
2017-08 – Procurement and Contracting Procedures	6/29/2017	To implement the requirements of the Uniform Guidance (2 CFR 200)

Approvals

President and CEO, AAWDC   *Kirkland J. Murray*
Kirkland J. Murray (Jan 27, 2023 07:19 EST)

Date: 01/27/2023

Policy Statement

The procurement of services, including WIOA Title I services and training, and all purchases of fixed assets and supplies acquired shall comply with this policy and all applicable local, state, and federal statutes. This policy will control all purchases and appropriately utilize available funding in the local workforce development area. This policy also requires that purchasing is in accordance with any respective funding stream. All procurements will be subject to requirements of the Uniform Guidance found at 2 CFR 200 unless the grant specifically requires more restrictive rules. In such cases, specific guidance will be provided by the Office of Compliance and the Office of Finance.

Procurement under the Uniform Guidance

Cost Reimbursement

Procurement transactions must be conducted on a cost-reimbursement basis unless other specified in the grant documentation covering the procurement. In all cases, transactions between the Local Board and state or local government units must be conducted on a cost-reimbursement basis.

General Procurement Standards

AAWDC will use documented procurement procedures that reflect State and local laws, so long as those laws conform to the Uniform Guidance found at 2 CFR 200.317 to 326.

AAWDC will maintain oversight to ensure that contractors perform consistently with the terms, conditions, and specifications of their contracts or purchase orders.

AAWDC's *Conflict of Interest* policy governs the actions of employees and board members engaged in the selection, award, and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal, state, or local award if they have a real, perceived, or potential conflict of interest. Conflicts must be disclosed in writing when known in advance or announced to the voting body. The conflicted party must excuse themselves from further discussion and cannot vote. Violations of the conflict of interest policy are subject to disciplinary action as defined by the *AAWDC Employee Handbook* and the *Conflict of Interest* policy.

AAWDC seeks to avoid acquiring unnecessary or duplicative items in keeping with good stewardship and cooperation principles. Where possible, AAWDC will promote the use of common or shared goods and services by entering into cost-shared agreements with other agencies or units of government. The use of Federal, state, or local excess and surplus property when such acquisition is in the best interest of AAWDC. When possible, AAWDC will take positive steps to ensure that minority businesses, women-owned, and labor surplus firms are used.

AAWDC will award contracts only to responsible contractors who can perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as:

- Contractor integrity;
- Contractor's ability to comply with and knowledge of public policy;
- Record of past performance; and/or
- Sufficient financial and technical resources to complete the project.

AAWDC will maintain records sufficient to detail the history of procurement. These records will include, but are not limited to:

- Rationale for the method of procurement;
- Selection of contract type;
- Basis for acceptance or rejection of contractor bid/proposal; and
- Basis for the contract price.

AAWDC will be responsible for the settlement of all contractual and administrative issues arising out of procurement, including:

- Evaluation of source;
- Protests;
- Disputes; and
- Claims

Competition

All procurement transactions must comply with the competition requirements of 2 CFR 200.319. This means that all procurements must be conducted in a manner that ensures full and open competition. Any contractors that assist in the drafting or developing any portion of the procurement, including specifications, requirements, statements of work, or requests for quotes or proposals, are excluded from competing for such procurements.

The following situations must be avoided and will void a procurement:

- Unreasonably restrict requirements on contractors to qualify them to do business, require unnecessary experience, and/or require excessive insurance/bonding (i.e., cherry picking);
- Noncompetitive pricing practices between contractors or between affiliated companies (i.e., price fixing);
- Use of retainer contracts for consultants (unless they are competitively sourced);
- Organizational conflicts of interest;
- Specifying "brand name" product when a product of equal performance or similar requirements is available;
- Use of geographic preferences in the evaluation of proposals (even if a state or local governmental entity statutorily imposes such preferences) unless applicable Federal statutes expressly mandate or encourage such preference; and/or
- Any other arbitrary action in the procurement process.

AAWDC will do its best to ensure that all prequalified lists of persons, firms, or products used in acquiring goods and services are current and include enough qualified sources to ensure maximum competition. Potential bidders may qualify during the solicitation period if the bidder is fully qualified by completing the procurement process.

Methods of Procurements

The Uniform Guidance provides four methods of procurements based on aggregate cost and other principles.

- *Micro-purchases* – A micro-purchase is the procurement of supplies or services whose aggregate cost does not exceed $25,000[1]. Micro-purchases do not require the solicitation of competitive proposals if AAWDC considers the cost reasonable. To the extent practicable, AAWDC will distribute micro-purchases equitably among qualified suppliers.
- *Small Purchases* – Small purchases are those relatively simple and informal procurements for services, supplies, or other property that do not exceed the Simplified Acquisition Threshold (currently $250,000 in aggregate cost). Small purchases require price or rate quotations from at least three qualified sources.
- *Competitive Proposals* – Competitive proposals are normally conducted when the cost is **not** the overriding consideration. While required for any aggregate purchase exceeding $250,000, AAWDC may also utilize the competitive proposal method when such a proposal is advantageous to the organization. Subawards must be solicited using competitive proposals or sealed bids (as discussed below). The following requirements guide competitive proposals:
    - Requests for Proposals (RFPs) must be publicized as widely as possible, including in a local paper of record and the AAWDC website. Any response to publicized requests must be considered to the maximum extent practical;
    - Proposals must be solicited from at least three qualified sources;

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[1] AAWDC must self-certify annually that it is a low-risk auditee. See 2 CFR 200.320(a)(1)(iv). If AAWDC is not a low-risk auditee or chooses to not certify, the micro-purchase threshold remains $10,000.

- o AAWDC will follow its written method for conducting technical evaluations of the proposals received and for selecting recipients; and
- o Contracts will be awarded to the responsible contractor whose proposal is most advantageous to AAWDC, with price and other factors considered.

Under certain narrowly defined circumstances, AAWDC may utilize sole-source procurement. The circumstances are as follows:

- The item being procured is only available from a single source; or
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation; or
- The Federal awarding agency or pass-through entity expressly authorizes sole sourcing in response to a written request; or
- After solicitation from at least three sources, competition is determined inadequate.

Appeals

AAWDC reserves the right to accept or reject any or all proposals or bids in whole or in part for any reason if it is determined to be in the organization's best interests. Any interested party may protest or appeal the decision of the organization. Appeals must be in writing, signed by an authorized official or agent of the party, and must be sent to:

Complaints Resolution
Office of Compliance
1131 Benfield Blvd., Ste. N
Millersville, MD 21108
complaints@aawdc.org

Appeals must be filed within seven days of formal notice of contract award. The appeal must include the following information:

- Name and contact information for the protesting party
- Identification of the procurement
- Statement of specific reasons for protest
- Supporting documentation

A decision on the appeal shall be made in writing by the cognizant Vice President (for contracts of $25,000 or less) or the President and CEO (for all other contracts). This decision shall be final.

Contracts and Contracting Authority

Actions Taken Before Contracting

Before finalizing a contract, AAWDC will do the following:

1. AAWDC will perform a cost or price analysis in connection with every procurement conducted as a competitive proposal or sealed bid, including contract modifications. The method and degree of analysis are dependent on the facts surrounding the procurement. When possible, AAWDC will make an independent estimate before receiving bids or proposals.
2. Where applicable, AAWDC will negotiate profit as a separate element of the price for each contract in which there is no price competition and, in all cases, where cost analysis is performed. To establish a fair and reasonable profit, consideration shall be given to the complexity of the work, the risk borne by the contractor, the contractor's investment, and industry profit margins in the surrounding geographical area for similar work.
3. Costs or prices based on estimates are allowable only to the extent that such costs would be allowable under Subpart E of the Uniform Guidance.
4. Cost plus percentage methods of contracting are not allowable.

The awarding agency may do a pre-procurement review. Should such a review be requested, AAWDC will make technical specifications and procurement documents available.

Suspension and Debarment

Non-federal entities and contractors are subject to the non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 CFR part 180. These regulations restrict awards, subawards, and contracts with certain parties debarred, suspended, or otherwise excluded from or ineligible for participation in federal assistance programs or activities.

Agents must ensure that all contractors are in good standing with the State of Maryland (or their state of incorporation for non-Maryland entities) and check the System for Award Management to ensure that AAWDC can award federal funds to contractors. In cases where AAWDC cannot independently verify good standing, AAWDC will allow self-certification.

Contract Term

As AAWDC subsists primarily on government grant funding, it is often imprudent for contracts to extend beyond a single fiscal year. However, AAWDC must also be a good steward of the funds entrusted to it and recognizes the value in longer-term agreements. These agreements typically provide better pricing and more convenient terms for AAWDC. Therefore, when prudent, AAWDC should negotiate contracts for three-year terms, including all extensions and option years.

Contract Provisions

All AAWDC contracts must contain the appropriate provisions described in Appendix II to Part 200. Those provisions are summarized in the table below:

	Contracts greater than $2000	Contracts greater than $10,000	Contracts greater than $100,000	Contracts over the Simplified Acquisition Threshold
EEO Clause (41 CFR Part 60)	✓	✓	✓	✓
Davis-Bacon Act	✓	✓	✓	✓
Debarment and Suspension	✓	✓	✓	✓
Byrd Anti-Lobbying Act			✓	✓
Termination for Cause/Convenience		✓	✓	✓
Contract Work Hours/Safety Standards Act			✓	✓
Rights to Inventions (non-profits and small businesses only)	✓	✓	✓	✓
Clean Air Act/ Federal Water Pollution Control Act				✓
Solid Waste Disposal Act		✓	✓	✓

Types of Contracts

AAWDC shall utilize the contract or agreement type most appropriate to the procurement. In all cases, such agreements must be legally sufficient and properly formulated as those terms are defined here:

- *Legal sufficiency* – A contract is legally sufficient if the contracting parties have the legal capacity to enter into such an agreement. Additionally, the contract must contain all material terms, be for a legal purpose (i.e., is an allowable cost), is in writing, is conscionable (i.e., is not patently unfair to either party), and has definitive terms.
- *Properly formulated* – A contract that is legible, logically formatted, written in plain English, tailored to the engagement, and anticipates and allocates foreseeable risks is considered properly formulated.

Subrecipient and Contractor Determinations

AAWDC will make a case-by-case determination whether each agreement it makes for the disbursement of grant funds casts the receiving party in the role of a subrecipient or a contractor.

In determining whether an agreement makes a non-Federal entity a contractor or a subrecipient, the substance of the relationship is the deciding factor. AAWDC will use reasonable judgment in classifying each agreement as a subaward or a contract. Documentation of the determination will be kept in the contract file.

In compliance with 2 CFR 200.330, AAWDC will classify providers of Workforce Innovation and Opportunity Act (WIOA) Title I services as subrecipients. Additionally, under WIOA Section 121, the one-stop operator shall be a subrecipient.

Authority to Contract

AAWDC authorizes agents to make purchases and encumber funds on its behalf to ensure that the organization can provide services with little to no interruption. Agency is authorized as follows:

- *Individual Training Account (ITA), Work-and-Learn (WAL), and On-the-Job (OJT) Contracts,* up to a limit of $10,000 per contract, will be signed by the appropriate Program Manager. Contracts over $10,000 require secondary approval from the appropriate Vice President.
- *Cohort Training Contracts and Other Participant-Based Contracts up to $100,000* will be signed by the appropriate Vice President.
- *For all other contracts and purchase orders under $50,000* will be signed by the appropriate Vice President.
- *For all other contracts and purchase orders* must first be obligated by the President and CEO who may authorize the appropriate employee to sign on behalf of AAWDC.
- The AAWDC Corporate Board of Directors must approve all contracts over $250,000 for signature by the President and CEO. Approval of contracts shall be included in the meeting minutes at which the contract is approved and must be approved at a properly posted meeting in compliance with the Open Meetings Act. There may also be certain contracts that require the approval of the Local Workforce Development Board. Those contracts shall be approved in a like manner.

Related Policies and Other Resources

Law

- *Workforce Innovation and Opportunity Act of 2014*, 29 U.S.C. §§ 3101 et seq.

Regulatory Guidance

- *Code of Federal Regulations, 2 CFR Part 180*, OMB Guidelines to Agencies on Government Debarment and Suspension (Nonprocurement)
- *Code of Federal Regulations, 2 CFR Part 200*, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- *Executive Order 12549, 51 FR 6370*, Debarment and Suspension

- *Executive Order 12689, 54 FR 34131*, Debarment and Suspension

<u>Local Area Resources</u>

- *AAWDC Employee Handbook*
- *AAWDC Code of Conduct and Ethics*, dated February 24, 2021
- *AAWDC Policy Memorandum 2023-03*, Public Ethics Requirements, dated January 23, 2023

Procurement and Contracting Policy - Final Draft

Final Audit Report   2023-01-27

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ANNE ARUNDEL COUNTY
LOCAL WORKFORCE DEVELOPMENT BOARD

AAWDC
ANNE ARUNDEL
WORKFORCE DEVELOPMENT
CORPORATION

Policy Memorandum 2020-05

Quality Assurance Guidelines – Effective October 1, 2019

INTENDED AUDIENCE:	AAWDC staff and subrecipients Local Board members and contractors
SUBJECT:	Quality Assurance and Monitoring
RESPONSIBLE OFFICE:	Office of Compliance
POLICY CONTACT:	Compliance Manager

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CANCELLATIONS

2018-04 – Quality Assurance Guidelines

STANDARD OPERATING PROCEDURES   **FORMS**

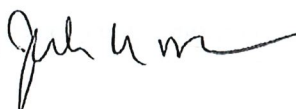Subrecipient Monitoring   AAWDC Monitoring Guide

Approvals

President and CEO, AAWDC

Chair, Local Workforce Development Board

Monitoring can serve many purposes. Although it is most commonly used as a compliance exercise to ensure that organizations are operating within the boundaries of Federal and grant requirements, the Anne Arundel County Local Workforce Development Board believes that monitoring should be a multi-faceted management activity. Viewed through this lens, monitoring becomes an activity that links planning, program design, implementation, technical assistance, and evaluation as well as financial requirement standards.

The Local Board is responsible for monitoring the delivery of workforce development programs for businesses and participants throughout the Anne Arundel County Local Workforce Development Area. To accomplish its responsibilities, the Board is provided with staffing through the Anne Arundel Workforce Development Corporation (AAWDC). AAWDC operates as the fiscal and administrative entity for workforce development funds in Anne Arundel County under Article 3, Title 14 of the County Charter. This designation also means that AAWDC may operate initiatives outside of the Local Board's oversight.

Policy Statement

This policy covers the monitoring of the following:

- The Local Board's oversight responsibilities under the Workforce Innovation and Opportunity Act (WIOA)
- Other programs or initiatives subject to Local Board oversight, such as monitoring of the One-Stop Operator and National Dislocated Worker grants.
- Other programs or initiatives operated by AAWDC, not subject to Local Board oversight.
- Subrecipient management and oversight by either the Local Board or AAWDC

Local Board Role in Oversight and Monitoring

The Local Board's oversight responsibilities shall include:

- Conducting oversight for local youth workforce investment activities, local employment and training activities for adults and dislocated workers, and the one-stop delivery system;
- Ensuring the appropriate use and management of the funds provided for the above activities;
- Ensuring the appropriate use, management, and investment of funds to maximize performance outcomes under Section 116 of WIOA; and
- Conducting monitoring of subrecipients, pursuant to 2 CFR 200.331.

AAWDC Role in Oversight and Monitoring

As the fiscal and administrative entity for workforce development activities in Anne Arundel County, AAWDC works closely with the Local Board to monitor the financial and programmatic health of the various workforce development programs under its purview. AAWDC management has designated the Office of Compliance as the primary oversight agent responsible for monitoring and corporate compliance. As such, compliance staff will have responsibility for:

- Implementing an effective internal monitoring program that focuses on identified critical risk factors;
- Providing oversight of corrective action programs and technical assistance efforts;
- Serve as the Grant Officer on all subrecipient agreements; and
- Coordinating the corporate compliance program with the Office of Human Resources, the Fiscal Office, the AAWDC executive team, and the Corporate Board of Directors.

If an initiative is overseen by the Local Board, compliance staff shall report to the Local Board through the Governance Committee. In all other cases, compliance staff shall report to the Corporate Board of Directors through the AAWDC executive team.

The Office of Compliance will produce a monitoring guide consistent with the U.S. Department of Labor's Core Monitoring Guide. The guide will cover the following:

1. Internal monitoring, including critical risk monitoring and coordinating with outside monitors.

2. Training provider monitoring, including work-and-learn monitoring, cohort training monitoring, and coordination of the local training provider list with the state Eligible Training Provider List (ETPL).
3. Subrecipient management and monitoring, including risk assessment, on-site monitoring, and finding resolution.

Findings and Resolution

When monitoring uncovers findings, the appropriate entity will be informed. The Office of Compliance shall utilize the 4 C method for communicating findings.

- *Condition* – A clear, concise, and specific statement describing the violation.
- *Cause* – A statement that explains why the condition occurred to the extent that it is identifiable. The cause is generally a person, thing, or event that produced the condition.
- *Criteria* – The standards or legal requirements that are being violated.
- *Corrective Actions* – Actions that eliminate the cause, correct or cure the condition, and allow symptoms to disappear.

The Office of Compliance shall provide sufficient time to correct any findings and may, at its sole discretion, conduct follow-up monitoring to ensure that findings do not reoccur.

Sanctions

When the Local Board or AAWDC executive team determine that findings reveal significant potential or actual problems with a subrecipient, sanctions may be instituted. Sanctions may include, but are not limited to:

- Designation of higher level of risk status, which will result in increased monitoring or pre-approval requirements;
- Disallowance of costs associated with the violation or deficiency and recapture of expended funds associated with the violation;
- Disapproval or adjustment of requests for program funds until the violation has been corrected;
- Reallocation of unexpended or unobligated funds;
- Contract reduction/de-obligation; and/or
- Contract termination.

Serious Infractions

Certain allegations merit special attention due to the nature of the allegations and infraction. Should monitoring activities reveal allegations of fraud and abuse, misapplication of funds, and/or gross mismanagement, payments to the subrecipient will be suspended immediately. The Local Board and/or AAWDC executive team must be immediately notified. Appropriate legal counsel and other services will be engaged to resolve the allegations.

Serious infractions include:

- *Fraud and abuse* – Deliberate action in violation of statute, regulation, or grant agreement. Fraud and abuse includes, but is not limited to: indications of bribery, forgery, extortion, embezzlement, theft, kickbacks, intentional payment to a subrecipient/contractor without expectation of receiving services, and payments to "ghost" participants.
- *Misapplication of funds* – The knowing and willful use of funds, assets or property not authorized or provided for in the grant or contract. Misapplication of funds includes, but is not limited to: political patronage, use of participants for political activities, ineligible enrollees, conflicts of interest, not reporting income from Federal funds, violation and the use of funds for purposes other than those stated in grant or contract.
- *Gross Mismanagement* – Any action or situation arising out management ineptitude or oversight which leads to major violation of contract provisions and/or which severely hampers accomplishment of program goals. Gross mismanagement includes, but is not limited to: inauditable records, unsupported costs, highly inaccurate fiscal and/or program reports, payroll discrepancies, payroll deductions not paid to the Internal Revenue Service and lack of internal controls and procedures.

Related Policies and Other Resources

- *Policy Issuance 2019-07* – Monitoring, dated July 17, 2019
- The following resources have been published by the U.S. Department of Labor:
    - Core Monitoring Guide
    - Grantee Handbook
    - SMART 3.0 Grants Management Training

Revision History

Policy Number	Date of Revision	Significant Change
2018-04 – Quality Assurance Guidelines	1/1/2018	Requirements for oversight and monitoring of all entities in the Anne Arundel Workforce Investment Area receiving workforce development funding.

ANNE ARUNDEL COUNTY
LOCAL WORKFORCE DEVELOPMENT BOARD

AAWDC
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Policy Memorandum 2020-11

Privacy and Data Security – Effective February 1, 2020

INTENDED AUDIENCE:	All members of the Anne Arundel County Local Workforce Development Board, board members and staff of Anne Arundel Workforce Development Corporation (AAWDC), and partner staff at the Anne Arundel County Career Center
SUBJECT:	Staff Responsibility Related to Privacy and the Protection of Personally Identifiable Information (PII) and other sensitive information
LAST REVIEWED/UPDATED:	November 2019
RESPONSIBLE OFFICE:	Office of Compliance
POLICY CONTACT:	Compliance Manager

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CANCELLATIONS

PPM 2017-10 – Personally Identifiable Information

STANDARD OPERATING PROCEDURES

None

FORMS

None

Approvals

President and CEO, AAWDC   *Kirkland J. Murray*
Kirkland J. Murray (Apr 4, 2020)

Chair, Local Workforce Development Board   *H. Walter Townshend*
H. Walter Townshend (Apr 4, 2020)

Introduction

The Anne Arundel County Local Workforce Development Board (Local Board) recognizes that partners within the workforce development system handle a vast amount of information about our customers and clients. Release of this information (intentional or otherwise) can be damaging if disclosed to the wrong individual or misused by staff. Personally Identifiable Information (PII) is collected on current and prospective registrants and participants, past participants, employees, Board members, etc. Additionally, partners may also collect PII on youth participants that requires additional consideration and special handling. In general, PII is protected by the following laws:

- Privacy Act of 1974
- Family Educational Rights and Privacy Act (FERPA)
- Gramm-Leach-Bliley Act (FTC Information Safeguarding Rule)
- Health Insurance Portability and Accountability Act (HIPAA)
- Children's Online Privacy Protection Act
- Maryland Confidentiality of Information Act
- Maryland Social Security Number Privacy Act
- Maryland Personal Information Protection Act

Policy Statement

AAWDC shall follow all federal, state, and local requirements to protect PII and sensitive information about an individual (including jobseekers, participants in AAWDC initiatives, business customers, and employees). While the goal of this policy is to prevent a security breach, AAWDC shall promptly respond to a breach (whether real or perceived) and act to contain and minimize loss as a result of the breach to the extent practicable and as required by law.

General

The Local Board oversees Anne Arundel County's workforce development system. Partners in the system collect participant-level demographic data as required by the programs the partners administer. This data collection allows the partners to:

- Determine eligibility for participation in various program and benefits administered by the partners
- Determine eligibility for inclusion on state or local eligible training provider lists
- Determine barriers to employment and provide supportive services, where applicable
- Track and ensure that programs are assisting clients and customers as they are supposed to do
- Track outcome and performance metrics
- Track program co-enrollment
- Track any follow-up requirements with clients and customers
- Collect demographic data on various population characteristics (such as disability and homelessness)
- Assist the Local Board in understanding the local workforce development system
- Assist the partners in applying for and obtaining grants

This data is collected in a variety of means, both in electronic and physical formats.

Data Access

Per Maryland Policy Issuance 2019-04, partner agencies are required to execute Data Sharing Memorandums of Understanding (MOUs), listing the specific data elements the agency can access and what purpose the data will be used for. There are four steps to gain data access:

1. *Information Release Form* – The agency must have the participant sign an Information Release Form. The form will acknowledge that the participant understands that certain data will be shared between partner agencies to support the participant's success in gaining meaningful employment.
2. *Data Sharing MOU* – The agency must have a data sharing agreement with the Local Board and its Administrative and Fiscal entity, AAWDC.

3. *Clear Understanding of Staff Responsibilities* – The agency must have a privacy and data security policy in place which clearly defines staff confidentiality and provides a Standard Operating Procedure for gaining access to confidential information and for restricting or deactivating staff access.
4. *Staff Training* – All staff with access to a data collection system must receive training from the parent agency within 30 days of being granted access. Additionally, the agency must provide annual training on privacy and data security.

Data Security

AAWDC, on behalf of the Local Board, has established the following standards for data security.

Physical file data must be protected by the following means:

- Reduce the volume of collected physical data to the minimum necessary to fulfill the reporting requirements of the data element or case management service.
- Access to physical file data is limited to staff who require access to perform necessary job functions (called "need to know" access).
- Files must be physically stored in a central location that can be secured.
- From employment records, equal opportunity and medical data should be stored separately from employee personnel file (see 29 CFR Part 38.41 for more information).
- For participant records, medical data should be stored separately from the participant's master file.
- Files should be secured (i.e., put away in a locking drawer) before leaving for an extended period.
- Due diligence monitoring of subgrantees and vendors should be conducted on a regular schedule.
- Files should be labeled utilizing a unique identifier (such as MWE State ID) that is not protected PII.
- Files should be disposed of through confidential recycling.

Electronic file data must be protected by the following means:

- Access to electronic records should be limited to staff who require access to perform necessary job functions. Access should be restricted to read only where a staff's necessary job functions does not require data entry or data validation job functions.
- Electronic files should utilize encryption and strong authentication procedures to make information unusable to unauthorized users.
- Data containing Protected PII should not be transmitted through electronic means, such as e-mail, unless encrypted (whenever possible) and shall not be transmitted through temporary memory devices (such as USB drives).
- Logging out of electronic data collections systems, such as MWE, when leaving the computer unattended.
- Use of aggregated data whenever possible.

Records Retention

Agencies must typically retain participant files and corresponding electronic data for a period of three years after the grant closeout date. For formula grants, the guideline is three years after participant's exit cohort close date. Fiscal data must be retained for seven years after the grant closeout date. These are de minimum standards. If an agency has requirements that differ from these standards, it is incumbent upon staff to be aware of those standards.

Definitions

Exit Cohort – An exit cohort is all exiters between July 1st and June 30th of a Program or Fiscal Year. The close date is July 1 of the next program year.

Personally Identifiable Information (PII) is any information pertaining to an individual that can be used to distinguish or trace a person's identity, on its own or in combination with other information that is linkable to that individual.

PII comes in many forms as indicated in the table below:

Type of Data	Definition	Examples
Protected PII	Information that, if disclosed, could result in harm to the individual whose identity is linked to that information.	- Social Security Numbers - Credit card numbers - Home telephone numbers - Age and/or birth date - Marital status and/or spouse name - Educational history - Biometric identifiers (i.e., fingerprints) - Medical history - Financial information - Computer passwords
Non-sensitive PII	Information that, if disclosed, by itself, could not reasonably be expected to result in personal harm. It is stand-alone information that is not linked or closely associated with any protected or unprotected PII.	- First and last names - E-mail addresses - Business addresses and/or phone numbers - General education credentials - Gender - Race

Record is the original or any copy of a document, regardless of form or medium, that is created, received, and maintained by AAWDC in pursuance of its legal obligations or in the transaction of business.

Related Policies and Other Resources

- Federal, state, or local policies
    - *TEGL 39-11* – Guidance on the Handling and Protection of Personally Identifiable Information (PII), dated June 28, 2012
    - *TEGL 07-16* – Data Matching to Facilitate WIOA Performance Reporting, dated August 23, 2016
    - *TEGL 05-08* – Policy for Collection and Use of Workforce System Participants' Social Security Numbers, dated November 13, 2008
    - *Office of Management and Budget Memorandum 07-16* – Safeguarding Against and Responding to the Breach of Personally Identifiable Information, date May 22, 2007
    - *Policy Issuance 2019-04* – Privacy and Data Security, dated March 28, 2019
    - *AAWDC Policy Memorandum 2020-04* – Incident Reporting, dated October 1, 2019
    - *AAWDC Privacy and Data Security Essentials Training*

Revision History

Policy Number	Date of Revision	Significant Change
2017-10 – Personally Identifiable Information	1/1/2017	Initial Policy