

REGION 12 RWDB/CEO MEETING

ATTACHMENT "A"

Location: Western Iowa Tech Community College

Date: 3/3/16

| PRESENT - RWDB MEMBERS | | | | ABSENT - RWDB MEMBERS | | | |
|-------------------------------|---|---------------------|---|------------------------------|---|-------------------|---|
| Neal Adler | | Rick Moon | X | Neal Adler | X | Rick Moon | |
| | | Dan Moore-via phone | X | | | Dan Moore | |
| John Hamm | X | James O'Donnell | | John Hamm | | James O'Donnell | X |
| Janet Hansen | X | Judy Peterson | | Janet Hansen | | Judy Peterson | X |
| Bridget Hoefling-via phone | X | Dr. Robert Rasmus | X | Bridget Hoefling | | Dr. Robert Rasmus | |
| Gerri Johnson-via phone | X | Marcia Rosacker | X | Gerri Johnson | | Marcia Rosacker | |
| Teresa Miller | | Jeff Simonsen | X | Teresa Miller | X | Jeff Simonsen | |

| PRESENT - CEO MEMBERS | | | | ABSENT - CEO MEMBERS | | | |
|------------------------------|---|-----------------|---|-----------------------------|---|-----------------|---|
| Craig Anderson | X | Mark Monson | X | Craig Anderson | | Mark Monson | |
| Tom Brouillette | X | Robert Paulsrud | | Tom Brouillette | | Robert Paulsrud | X |
| Pete Groetken | | Jeff Simonsen | X | Pete Groetken | X | Jeff Simonsen | |

| PRESENT | | | PRESENT | | |
|---|--|---|---|--|---|
| Shawn Fick – Job Training Partners | | X | Pamela Woolridge (ESL/ELL) – Ex-Officio | | X |
| Janet Gill – Job Training Partners | | X | Mary Ott (IVRS) – Ex-Officio | | X |
| Lori Knight – Job Training Partners | | X | Erin Volk – WITCC | | X |
| Todd Spencer – Iowa Workforce Development | | X | Matt Winkel – Proteus | | X |
| Jo Fokken – Job Training Partners | | X | | | |

- 1. Call to Order & Roll Call – RWDB @ 4:05pm / CEO @ 4:06pm**
- 2. Approval of Agenda – RWDB & CEO**
- 3. Approval of January 21, 2016 Joint RWDB/CEO Minutes – RWDB & CEO**
- 4. New Business:** Approval to Cancel the March 17, 2016 RWDB/CEO Meeting – RWDB & CEO; Review & Consideration of Ex-Officio Member – Jean Logan, Community Action Agency of Siouxland – CEO; Governor’s 2016 Future Ready Iowa Summit on April 16, 2016 in Des Moines at the Hy-Vee Hall; Approval of Letter of Support for TechHire Grant Application – RWDB & CEO; Local Service Plan Review of Initial Draft; Review and Approval of RFP WIOA Title I Programs – RWDB – Executive Session (i. Adult/DW Service Provider, ii. Youth Service Provider); Approval of YAC or Youth Standing Committee – RWDB; Approval of Appointments to Youth Committee/Council – Jackie Stellish, Job Corps & Michele Haupt, Sioux City Housing – RWDB
- 5. Old Business:** Open RWDB Position
- 6. IowaWORKS Region 12 Managers’ Report:** Shawn Fick
- 7. RWDB Chair Report:** Bridget Hoefling;
- 8. Policy/Field Memo Updates: Summary; Memo# 16-01:** Youth, Adult and Dislocated Worker Carryover Policy; **TEGL# 13-15:** On-the-Job Training (OJT) Wage Caps and Reimbursement Rate Waivers for Job Driven, Dislocated Worker Training and Sector Partnership National Emergency Grants (NEGs); **TEN# 23-15:** Announcing the release of the revised *Section 188 WIOA Nondiscrimination and Equal Opportunity Regulations (29 CFR Part 38) Notice of Proposed Rulemaking (NPRM) in the Federal Register*
- 9. WIOA Updates:** MOU Template Update
- 10. Reports from Individual RWDB/CEO Members**
- 11. Report from State Representative**
- 12. Report from State Workforce Investment Board**

| Motions Taken - Decisions Reached | | | |
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| APPROVALS | 1ST | 2ND | Unanimously Approved |
| 2. March 3, 2016 Agenda – RWDB | John Hamm | Dr. Rasmus | X |
| 2. March 3, 2016 Agenda – CEO | Craig Anderson | Mark Monson | X |
| 3. January 21, 2016 Joint RWDB/CEO Minutes – RWDB | Rick Moon | Marcia Rosacker | X |
| 3. January 21, 2016 Joint RWDB/CEO Minutes – CEO | Mark Monson | Craig Anderson | X |
| 4a. Cancel March 17, 2016 RWDB/CEO Meeting – RWDB | Marcia Rosacker | Rick Moon | X |
| 4a. Cancel March 17, 2016 RWDB/CEO Meeting – CEO | Craig Anderson | Tom Brouillette | X |
| 4b. Review & Consideration of Ex-Officio Member – Jean Logan, Community Action Agency of Siouxland – CEO | Mark Monson | Craig Anderson | X |
| 4c. Letter of Support for TechHire Grant Application – RWDB | Rick Moon | Marcia Rosacker | X Dr. Rasmus Abstained |
| 4c. Letter of Support for TechHire Grant Application – CEO | Craig Anderson | Mark Monson | X |
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| 4d. Standing Youth Committee –RWDB | Jeff Simonsen | Rick Moon | X |
| 4e. Appointments to standing Youth Committee – Jackie Stellish, Job Corps & Michele Haupt, Sioux City Housing – RWDB | Dr. Rasmus | Marcia Rosacker | X |
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| 13. Adjournment-CEO @ 4:32pm | Jeff Simonsen Adjourned the CEOs | | |
| Reviewed RFP Process and Conflict of Interest – Todd Spencer | | | |
| Motion to Appoint Review Committee for the RFPs | Rick Moon | Marcia Rosacker | X |
| Motion to move to closed session to comply with procurement process to prevent an unfair advantage defined by state and federal laws – RWDB (Roll Call Vote) Yes: John Hamm, Janet Hansen, Bridget Hoefling, Geri Johnson, Rick Moon, Dan Moore, Dr. Robert Rasmus, Marcia Rosacker, Jeff Simonsen No: None Unanimously Approved | | | X |
| Closed session for RFP WIOA Title I Programs – Adult/DW Service Provider; Youth Service Provider Bridget Hoefling and Dr. Rasmus stated conflict of interests in participating in any RFP activities of the Board and recused themselves. | | | |
| Motion to move out of closed session @ 5:24pm | Jeff Simonsen | Rick Moon | X |
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| Motion that IWD can post RFPs for public review (Roll Call Vote) (Geri Johnson not present via phone) Yes: Janet Hansen, Jeff Simonsen, John Hamm, Rick Moon, Dan Moore, Marcia Rosacker No: None Unanimously Approved | Jeff Simonsen | Rick Moon | X |
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| 13. Adjournment-RWDB @ 5:29pm | Janet Hansen Adjourned the RWDB | | |
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Meeting Notes

Reports/discussion:

Attachment B – Governor’s 2016 Future Ready IA Summit will be held on April 19, 2016 at the Hy-Vee Hall in Des Moines, Iowa.

Erin Volk, Director of Institutional Research at Western Iowa Tech Community College reviewed information on the TechHire Grant Application and asked for support from the boards. The grant would provide services and training opportunities in Advanced Manufacturing fields to qualified individuals who are unemployed and under employed. Over the 4 year period of the grant the region would provide training funds to cover tuition, employment referrals, employability plans, outreach for internships and on the job training with employers. The grant would be begin June 1, 2016.

Shawn Fick talked about Local Service Plan progress. It needs to be done by next Thursday, March 10, 2016 for review by the state.

Janet Gill reviewed new guidance documents on Youth, Adult and DW carryover, OJT wage caps, and WIOA Nondiscrimination regulations.

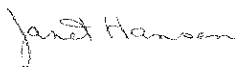
Jo Fokken stated under WIA a Youth Advisory Committee was required. Under WIOA you can have a standing Youth Committee.

Shawn Fick talked about the need to fill the vacancy on the board with a female in business that is either a democrat or independent. Will need two applicants to be reviewed by the CEOs and then the CEOs pass their recommendation on to Governor Branstad. The Governor can reject both applicants or approve one. If Governor approves one will send back to the CEOs.

Jeff Simonsen adjourned the CEOs 4:32pm.

Todd Spencer reviewed the RFP process and explained the conflict of interest. IWD representatives are going out to the boards to eliminate conflict of interest. Conflict of interest is anyone employed by the employer who will be bidding on the RFP. A standardized form for the RFP was put into place. The board will need to create a review board for the RFPs.

RESPECTIVELY SUBMITTED



Janet Hansen
Date: 1/21/16

“The Mission of our group is to fully engage the Region 12 community in strengthening the economy through workforce development making it a better place to live, work, and grow.”

RWIB/CEO MEETING DATES 2016-2017

**SEPTEMBER 22, 2016 — WESTERN IOWA TECH
COMMUNITY COLLEGE, SIOUX CITY — 4:00PM
JOINT RWIB/CEO MEETING**

**NOVEMBER 17, 2016 — WESTERN IOWA TECH
COMMUNITY COLLEGE, SIOUX CITY — 4:00PM**

**JANUARY 26, 2017 — WESTERN IOWA TECH
COMMUNITY COLLEGE, SIOUX CITY — 4:00PM
JOINT RWIB/CEO MEETING**

**MARCH 23, 2017— WESTERN IOWA TECH
COMMUNITY COLLEGE, SIOUX CITY — 4:00PM**

**MAY 25, 2017 — WESTERN IOWA TECH
COMMUNITY COLLEGE, SIOUX CITY— 4:00PM
JOINT RWIB/CEO MEETING**

"The Mission of our group is to fully engage the Region 12 community in strengthening the economy through workforce development making it a better place to live, work, and grow."

| # | Commenter | Section/Topic | Comment Summary | Response |
|---|-------------------|---|---|---|
| | | Region 12-Sioux City | | |
| 1 | IDB | Form 1-One Stop System-System Location Attachment | The spreadsheet for all of the one-stop service locations was not complete. | The Board agrees with the comment and additional information related to locations has been updated. |
| 2 | IWD and IDB | Economic Analysis | Requests for additional information specific to IVRS and IDB | The Board agrees with the comment and additional information related to economic analysis and additional information for the two partner programs has been updated. |
| 3 | IWD and IDB | Economic Analysis | Request for additional details related to the strengths and weaknesses of local workforce activities | The Board agrees with the comment and additional information related to the strengths and weaknesses of current local workforce activities is included. |
| 4 | IWD and IDB | Regional Strategic Planning | Requests for additional details related to how the core partners will align resources to achieve the strategic goals and visions | The Board agrees with the comment and additional information related to how the alignment of core partners and resources will occur is included |
| 5 | IWD and IDB | Regional Strategic Planning | Requests for additional details on how access will be expanded for employment, education, training, and support services for youth and individuals with barriers to employment. | The Board agrees with the comment and additional information related to expanded access is included. |
| 6 | IWD, ABE, and IDB | Regional Strategic Planning | Requests for additional details on development of career pathways and co-enrollment to improve access to recognized stackable and transferrable credentials. | The Board agrees with the comment and additional information related to expanded access is included. |

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| 7 | IWD, ABE, and IDB | Regional Strategic Planning | Requests for information on additional strategies developed in the region relative to workforce development, education, and training needs. | The Board agrees with the comment and additional information related to additional strategies is included. |
| 8 | IWD and IDB | Regional Strategic Planning | Requests for additional information on how the regional strategies align with the State's Unified Plan | The Board agrees with the comment and additional information related to the region's strategies is included. |
| 9 | IWD and IDB | Regional Strategic Planning | Requests for additional information on how the core partners will contribute to the State's level of performance. | The Board agrees with the comment and additional information related to how the core partner's will contribute to the State's level of performance is included. |
| 10 | IDB | Regional Strategic Planning | Request for additional information on how the region will assess overall effectiveness with regards to the strategic vision, goals, and strategies. | The Board agrees with the comment and additional information related to overall effectiveness is included. |
| 11 | IWD and IDB | Operational Planning Elements | Request for additional information on the how the region is planning and implementing strategies for the One-Stop System. | The Board agrees with the comment and additional information related to the planning and implementing strategies is included. |
| 12 | IDB | Operational Planning Elements | Request for additional information on the strategies to improve service delivery and avoid duplication of services. | The Board agrees with the comment and additional information related to strategies and avoiding duplication of services is included. |
| 13 | IDB | Operational Planning Elements | Request for additional information on accessibility to the NCRC for clients of IDB. | The Board agrees with the comment and additional information related to access to the NCRC for clients of IDB is included. |

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| 14 | ABE | Operational Planning Elements | Request for additional information on how activities are coordinated among partners. | The Board agrees with the comment and additional information related to how activities are coordinated among partners is included. |
| 15 | IDB | Operational Planning Elements | Request for additional information on how core partners connect services to targeted populations. | The Board agrees with the comment and additional information related to how core partners connect services to targeted populations is included. |
| 16 | IDB | Operational Planning Elements | Request for additional information on how the region coordinates and promotes entrepreneurial skills training. | The Board agrees with the comment and additional information related to how the region coordinates entrepreneurial skills training is included. |
| 17 | IDB | Operational Planning Elements | Request for additional information on how the Board uses Registered Apprenticeships to support the regional economy. | The Board agrees with the comment and additional information on how the Board used Registered Apprenticeships to support the regional economy is included. |
| 18 | IDB and IWD | Operational Planning Elements | Request for additional information on how the Board and core partners with local education and training providers to leverage funds to enhance access. | The Board agrees with the comment and additional information on how the Board and core partners with local education and training providers is included. |
| 19 | IDB | Regional Operating System and Policies | Request for additional information on the RWDB's operational structure and decision making process. | The Board agrees with the comment and additional information on the operational structure and decision making process is included. |
| 20 | IDB | Regional Operating System and Policies | Request for additional information on appointment of members to the youth standing committee. | The Board agrees with the comment and additional information on the appointment of members to the youth standing committee is included. |

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| 21 | IDB | Regional Operating System and Policies | Request for additional information on how the region provides services in remote areas, the technology that is used, how the region will comply with accessibility requirements, and ensure non-discrimination. | The Board agrees with the comments and additional information on how regional services in remote areas are provided, how technology is used, compliance with accessibility, and non-discrimination is included. |
| 22 | IDB | Regional Operating System and Policies | Request for additional information on how the Board will ensure continuous improvement of services. | The Board recognizes the comment and additional information on ensuring continuous improvement in services is included. |
| 23 | IDB and IWD | Regional Operating System and Policies | Request for additional information on the Board's approach to meeting the minimum youth expenditure rates. | The Board agrees with the comment and additional information on the approach to meeting the minimum youth expenditure rates is included. |
| 24 | IWD | Regional Operating System and Policies | Request for additional information on local area oversight and monitoring. | The Board agrees with the comment and additional information on local area oversight and monitoring is included. |

Region 12 Response to Local Service Plan

State Comments

1. Comment: The spreadsheet for all of the one-stop service locations was not complete.

Response: The Board agrees with the comment and additional information related to locations has been updated.

The spreadsheet was updated to add Jessica Badding and her contact information.

2. Comment: Requests for additional information specific to IVRS and IDB

The Board agrees with the comment and additional information related to economic analysis and additional information for the two partner programs has been updated.

The PDF was updated to include LMI and performance measures to the IWD Region 12 LMI.

3. Comment: Request for additional details related to the strengths and weaknesses of local workforce activities

Response: The Board agrees with the comment and additional information related to the strengths and weaknesses of current local workforce activities is included. The information below was added to IowaGrants.

Please see the 2015 Annual Profile Region 12 in attached document "2016 IWD Region 12 LMI" pdf. A detailed analysis of the in-demand industries and occupations for the region is included in the profile through the IWD LMI department.

Please see the 2015 Annual Profile Region 12 in attached document "2016 IWD Region 12 LMI" pdf. The in-demand industries and sectors are reviewed and analyzed by the IWD LMI office and provide key data on high demand areas including the medical field, skilled production, and transportation, specifically truck driving positions.

Please see the 2015 Annual Profile Region 12 in attached document "2016 IWD Region 12 LMI" pdf. This document provides analysis of key labor market trends across existing industries and occupations specific to the region which are analyzed by key staff that have access to the raw data and provide the data for quick review and easy access.

Please see the 2015 Annual Profile Region 12 in attached document "2016 IWD Region 12 LMI" pdf. In addition to this information, planning for implementation of the WIOA program brings Adult Basic Education and Vocational Rehabilitation Services in a closer partnership to deliver services in the region to those populations who are in need of additional educational assistance and other up-skill building specific to their individual needs and barriers to employment.

Please see the 2015 Annual Profile Region 12 in attached document "2016 IWD Region 12 LMI" pdf. Planning for implementation of the WIOA program brings Adult Basic Education and Vocational Rehabilitation Services in a closer partnership to deliver services in the region to those populations who need to be brought into the pool of potential talent for business and industry.

The strengths of Region 12 include the following. It has a One-Stop Center with seven agencies and partners under one roof. This provides the region with the ability to help resolve multiple barriers, provide quick referrals, and allows for regional knowledge of partners including the names of the individuals working with the program and not just the programs. In addition this collaboration by all partners is now demonstrated in writing and through the development of the local service plan. In order to serve everyone in the region there are workshops available to help all customers and participants further develop their knowledge, skills, and abilities regardless of their barriers or challenges to getting or staying in a career. Everyone in the One-Stop System is working toward the same common goal sometimes through group efforts, and other times via individual and one-to-one assistance. Partners and programs currently have the ability to call for referrals by picking up the phone i.e, direct access or simply walking them over to the most knowledgeable person available. Assistive technology is available for those with language barriers as well as physical and other barriers. Customer focused services are the goal for all of the programs in the system. The One-Stop System also host's employers in the Center for ease of access. There is a bus stop immediately outside the building. The experience of the staff to work with employers to review and develop BSR services to truly provide business guidance to fill open positions helps benefit businesses and those interested in positions. A very knowledgeable veteran's representative (DVOP) and other staff assist vets and their families with info, resources, referrals, etc. Finally, one of the greatest strengths of the region is that partners make available flexible hours and meeting options which meet the needs of all customers in this region.

Weaknesses or challenges in this region include the lack of accessibility for the National Career Readiness Certificate (NCRC) for those in need of accessibility options and formats. The One-Stop closes at 4:30pm and is not open evenings or weekends for most services and assistance. The options for any services after hours in most cases are only available through prior arrangements and at partner locations and offices.

4. Comment: Requests for additional details related to how the core partners will align resources to achieve the strategic goals and visions
Response: The Board agrees with the comment and additional information related to how the alignment of core partners and resources will occur is included.

The information below was added:

Open communication between programs and staff members, referrals to all programs as appropriate, and the blending of resources whenever and wherever possible which leads to shared, dual, and co-enrollments allows for individuals with all barriers to career pathways to receive the assistance they need to be successful. Partners assist each other with accessing comparable resources which allows for aligning pay options for the benefit of participants. This partnering of programs and staffing resources allows the regions to individualize services to people with the most significant barriers.

5. Comment: Requests for additional details on how access will be expanded for employment, education, training, and support services for youth and individuals with barriers to employment.

Response: The Board agrees with the comment and additional information related to expanded access is included.

The information below was added:

All core partners are focused on ensuring services are delivered and available to all eligible individuals, including eligible individuals with barriers to employment. In order to expand access to employment, education, training and other support services for all individuals, there are options to access resources on-line through internet based access points and other on-line resources for which accessibility must be developed and maintained at the state level. The English Language Learner (ELL) and Adult Basic Education (ABE) services are offered at multiple locations around the region which provide better accessibility options for those with barriers. The hours for these services vary at each location though they are generally available from 8:30 am in the morning until late evening hours which end at 9:00 pm.

6. Comment: Requests for additional details on development of career pathways and co-enrollment to improve access to recognized stackable and transferrable credentials.

Response: The Board agrees with the comment and additional information related to expanded access is included.

The information below was added:

The region is working on developing strategies for credentials in career pathways specifically utilizing the following: High School Equivalency Diploma (HSED), Certified Nursing Assistant (CNA), and Commercial Driver's License (CDL). In addition, stackable certificate and credential programs including welding, HVAC, and auto-tech use a blending of funds including GAP tuition assistance to support both the direct education costs as well as other expenses such as transportation and dependent care. Labor Market Information (LMI) is provided to HSED classes to help students better understand their options for career pathways. Apprenticeship options are available for those participants who struggle with regular classroom attendance and learn in a "hands on" environment. This allows for individuals to also earn income to support themselves and their families while learning a high demand skill. One-to-one support for the most significantly disabled (MSD) participants is provided to make sure they are fully aware of their options and career expectations. Staff from all of the core and partner programs continue working one on one with students who have barriers to employment including ELL, HSED, MSD, and ex-offenders.

7. Comment: Requests for information on additional strategies developed in the region relative to workforce development, education, and training needs.

Response: The Board agrees with the comment and additional information related to additional strategies is included.

The information below was added:

Additional resources developed by the region relative to workforce development includes utilizing and blending funds from the Free Application for Federal Student Aid (FAFSA), Women

Aware funding sources, and GAP tuition assistance. Other grant resources such as TECH grants, Vocational Rehabilitation Services, Iowa Department for the Blind, flexible funding from the Disability Employment Initiative (DEI) grant, Promise Jobs, Veteran's services are all considered and utilized when and where appropriate to allow for a full blending of resources. In some instances private employer resources are available for short term training which leads to credentials for participants.

8. Comment: Requests for additional information on how the regional strategies align with the State's Unified Plan

Response: The Board agrees with the comment and additional information related to the region's strategies is included.

The information below was added:

Accessibility to resources is always kept in mind when working with individuals who face barriers. Reasonable accommodations are also available, mentioned, and provided upon request. Everyone is greeted at the front door with a hand shake and triage questions. Iowa Department for the Blind will be providing training to all One-Stop Center staff during the Wednesday morning training to ensure awareness of the expectations and options to provide full accessibility to all of the services in the region for anyone needing accommodations.

9. Comment: Requests for additional information on how the core partners will contribute to the State's level of performance.

Response: The Board agrees with the comment and additional information related to how the core partner's will contribute to the State's level of performance is included.

The information below was added:

Once each month there is also core-partner/all staff training on varied topics including accessibility. Yearly training is also provided regarding the American's with Disabilities Act (ADA), Equal Opportunity Employer (EOE), Affirmative Action (AA), in addition to monthly BSR sessions that cover human resource and related topics such as social networking, the Fair Labor Standards Act (FSLA), etc.

10. Comment: Request for additional information on how the region will assess overall effectiveness with regards to the strategic vision, goals, and strategies.

Response: The Board agrees with the comment and additional information related to overall effectiveness is included.

The information below was added:

Performance measures are reviewed on a regular basis and when they are provided by the state staff who oversees the measures and completes the reports. There are challenges to reviewing and revising the performance measures once a participant has

exited the program due to the lag of reporting requirements and the amount of time during which the performance is measured.

11. Comment: Request for additional information on the how the region is planning and implementing strategies for the One-Stop System.

Response: The Board agrees with the comment and additional information related to the planning and implementing strategies is included.

The information below was added:

Open communication between programs and staff members, referrals to all programs as appropriate, and the blending of resources whenever and wherever possible which leads to shared, dual, and co-enrollments allows for individuals with all barriers to career pathways to receive the assistance they need to be successful. Partners assist each other with accessing comparable resources which allows for aligning pay options for the benefit of participants. This partnering of programs and staffing resources allows the regions to individualize services to people with the most significant barriers.

12. Comment: Request for additional information on the strategies to improve service delivery and avoid duplication of services.

Response: The Board agrees with the comment and additional information related to strategies and avoiding duplication of services is included.

The information below was added:

The core partners and programs are part of the development and long term planning for activities and events that are part of the region's implementation process. Region 12 utilizes collaboration of services and funding streams whenever possible to ensure that all participants receive the assistance and access to resources to make sure they can be successful long term. Funding options including GAP, Pell, DEI, IVRS, IDB, Promise Jobs, and WIOA Title 1 are blended and used whenever and wherever appropriate to meet individual needs and access requirements.

13. Comment: Request for additional information on accessibility to the NCRC for clients of IDB.

Response: The Board agrees with the comment and additional information related to access to the NCRC for clients of IDB is included.

The information below was added:

Although the NCRC is available for all individuals to take, accessibility and accommodation issues with the company providing this service prevent a participant from being able to fully receive the benefits of this testing format. Although the region has worked to overcome this obstacle, it remains unchanged at this point. The region will continue to work with all participants to assist with taking all credentials and testing options to make sure their needs are

met whenever possible. Staff will also receive training on how to best utilize accommodation and accessibility resources to eliminate duplication.

14. Comment: Request for additional information on how activities are coordinated among partners.

Response: The Board agrees with the comment and additional information related to how activities are coordinated among partners is included.

The information below was added:

IRT (Integrated Resource Team) meetings are utilized in Region 12 to ensure that resources and options are not duplicated between programs. The monthly career services workshops provided in the One-Stop Center helps individual program partners plan for already scheduled workshops to prevent duplication and allows for utilization of resources that are already available. The unified MIS system being reviewed and implemented by the State of Iowa will assist with preventing duplicating of services.

15. Comment: Request for additional information on how core partners connect services to targeted populations.

Response: The Board agrees with the comment and additional information related to how core partners connect services to targeted populations is included.

The information below was added/updated:

Region 12 IowaWORKS has been a pilot program for the Disability Employment Initiative for a number of years and has successfully increased services to persons with disabilities. IowaWORKS has a sound partnership with Iowa Vocational Rehabilitation Services and Iowa Department for the Blind which allows co-enrollments to occur between the partners whenever appropriate. All staff in the IowaWORKS center serve veterans and their families. In addition, the region's Disabled Veterans Outreach Program (DVOP) staff member serves eligible veterans and their families for more individualized career services. The Home-Based Iowa initiative is reaching out to returning veterans and encouraging those veterans and families to locate to northwest Iowa. The PROMISE JOBS program is operated through the Region 12 IowaWORKS office and many of the Temporary Assistance to Needy Families (TANF) recipients are co-enrolled in multiple programs through the One-Stop system. Ongoing Trade Adjustment and Rapid Response activities are offered through the center as needed to assist affected dislocated workers in becoming re-employed.

16. Comment: Request for additional information on how the region coordinates and promotes entrepreneurial skills training.

Response: The Board agrees with the comment and additional information related to how the region coordinates entrepreneurial skills training is included.

The information below was added/updated:

The small business development center at WITCC provides ongoing entrepreneurial training and assistance throughout the region for anyone interested in starting or expanding their own business.

Iowa Vocational Rehabilitation and Iowa Department for the Blind promote self-employment for eligible participants through the Iowa Self Employment program

IowaWORKS promotes and explores opportunities for center customers to establish self-employment

WIOA offers support and tuition assistance for customers to obtain necessary business building skills for small business operation.

Referrals to and engagement of the Small Business Development Center for one-stop customers

Small Business Development Staff participate in Rapid Response Employee Meetings
Business Enterprise Program which prepares people to run their own business under the Randolph-Sheppard Act.

17. Comment: Request for additional information on how the Board uses Registered Apprenticeships to support the regional economy.

Response: The Board agrees with the comment and additional information on how the Board used Registered Apprenticeships to support the regional economy is included.

The information below was added:

WIOA Title I and Title IV may be able to provide support services for individuals in apprenticeships to be successful. Apprenticeship requirements will be reviewed with IDB/IWRS counselors to ensure that individuals who have disabilities are able to participate with the use of an accommodation whenever possible.

18. Comment: Request for additional information on how the Board and core partners with local education and training providers to leverage funds to enhance access.

Response: The Board agrees with the comment and additional information on how the Board and core partners with local education and training providers is included.

The information below was added/updated:

Local educational institutions including all of the approved training providers on the approved training provider list are focused on career and technical programs that are state of the art and meet the needs of our regional employers. The colleges utilize advisory boards to review and work with program faculty to ensure curriculum meets the needs of the local job market. Job driven education and training is delivered in both credit and non-credit formats. Most of the career program areas offer short term certificate options as well as one year diploma and two year associate programs to meet the various needs and timeframes of job seekers and employers. In addition, customized training is an option to structure training that is directly linked to job skills needed in the workplace.

WITCC has a Disability Coordinator to assist with developing plans to determine what accommodations are needed and how they will be implemented. The training institutions utilized on the approved training provider list provide accommodations upon request. The training institutions currently provide interpreters, human readers, Kurzweil readers, sign language interpreters, and other accommodations as requested.

19. Comment: Request for additional information on the RWDB's operational structure and decision making process.

Response: The Board agrees with the comment and additional information on the operational structure and decision making process is included.

The information below was added/updated:

The Regional Workforce Development Board (RWDB), appointed by the Governor in consultation with the Chief Elected Official (CEO) board, plays a leading role in establishing policy for the region's Workforce Development Center system. The RWDB also selects the WIOA service providers, directs the activities of the board standing committees, and shares responsibility for many other duties with the CEO board, including oversight of the regional Workforce Development Center system's service delivery. The Region 12 Youth Standing Committee provides guidance for local youth programs operated under the Workforce Innovation and Opportunity Act. In addition the Committee provides expertise in youth policy and assists the Regional Workforce Development Board. During regular meetings of the RWDB and CEO boards they are provided updated information with regard to performance measures, training programs being considered for approval in the region, they receive updated LMI data to determine options for future training programs, and vote with a simple majority on issues brought before them.

20. Comment: Request for additional information on appointment of members to the youth standing committee.

Response: The Board agrees with the comment and additional information on the appointment of members to the youth standing committee is included.

The information below was added/updated:

In the selection of committee members including the positions filled by a parent of a youth or the youth representative, a parent of a youth with a significant disability and/or a youth with a disability will be considered. This will be in addition to representation by community partners that serve youth with disabilities.

21. Comment: Request for additional information on how the region provides services in remote areas, the technology that is used, how the region will comply with accessibility requirements, and ensure non-discrimination.

Response: The Board agrees with the comments and additional information on how regional services in remote areas are provided, how technology is used, compliance with accessibility, and non-discrimination is included.

The information below was added/updated:

In order to facilitate better transportation options, IowaWORKS managers and staff serve on the Siouxland Interstate Metropolitan Planning Council (SIMPCO) based in Sioux City. The goals for SIMPCO include developing long term plans to assist the region under their Transportation Planning. Another program coordinated by SIMPCO is the Siouxland Regional Transit System (SRTS) which provides transportation in and around the region. Although the options for transportation are available on a limited basis in most cases, the region is continuing to work toward increasing the available times for transportation to everyone needing transportation assistance. The vehicles that are used for SRTS transportation provide accessibility options including pick up and drop off at either the curb or door depending on individual need and power lifts for those using wheelchair or other mobility devices. The services are not free though more affordable than other transportation options.

Services available to anyone seeking them through electronic means can be accessed through any computer and internet connected system to allow for access at home through a personal computer. Anyone not having access to the internet can go to locations around the region that have computer and internet access through the VAP system which was developed by IWD who oversees and maintains accessibility services.

Anyone seeking assistance at the One-Stop Center is able to access the services through electronic readers, large print, and a human reader depending on which option they prefer. Braille is an accommodation that is available though it is not immediately available in most cases due to regular updates and changes to documents.

The One-Stop System core and partner programs will be reviewing accessibility for new materials, items, programs, workshops, etc. on a regular basis. In order to make certain everyone is receiving the assistance they need, individualized one-on-one services and accessibility is available to anyone with the most significant disabilities.

22. Comment: Request for additional information on how the Board will ensure continuous improvement of services.

Response: The Board recognizes the comment and additional information on ensuring continuous improvement in services is included.

The information below was added/updated:

In addition, the partners will encourage, accommodate staff, and/or provide training and cross-training, as deemed appropriate, to ensure that all partner staff are familiar with all programs represented within the Region 12 One-Stop System in order to integrate services, eliminate duplication, and improve overall service delivery.

Currently each core and related partner is responsible for its own satisfaction surveys. Until the state is able to institute a uniform manner by which all services provided to customers can be linked, each partner will need to continue measuring their individual customer satisfaction.

23. Comment: Request for additional information on the Board's approach to meeting the minimum youth expenditure rates.

Response: The Board agrees with the comment and additional information on the approach to meeting the minimum youth expenditure rates is included.

The information below was added/updated:

Iowa Vocational Rehabilitation and Iowa Department for the Blind will partner with IowaWORKS to deliver work experience opportunities for disabled youth. IDB provides transition weekend retreats throughout the year and extended summer camps. VR (IVRS and IDB) provides pre-employment transition services to youth during the school year and throughout the summer months.

24. Comment: Request for additional information on local area oversight and monitoring.

Response: The Board agrees with the comment and additional information on local area oversight and monitoring is included.

The information below was added/updated:

Internal participant monitoring includes verification of eligibility and ensuring adequate services were provided in a timely manner including career guidance, staff training/education, and case notes completion.

ADMINISTRATIVE/FINANCIAL REQUIREMENTS

The purpose of this section is to provide information regarding general and specific requirements of a financial system. Each section provides general comments about varying aspects of financial activity and shall not be interpreted as the only standards by which a local area may be held accountable. All references to "Recipient" within this section are applicable to the local boards, One-Stop Service Provider, Fiscal Agents, and any other subrecipient providing services for WIOA. Allowable costs shall be determined in accordance with the Office of Management and Budget, Uniform Guide found in 2 CFR, Part 200, the WIOA Act and the implementing regulations. Nothing in this section may be less restrictive than any of the guidelines found in those rules and law.

General Guidelines

All WIOA expenditures must be accounted for in accordance with state and federal laws and procedures which cover all other funds which are expended by an entity. Records must be sufficient to allow the preparation of reports required by general and program-specific terms and conditions and the tracing of funds to a level of expenditure adequate to establish that such funds have been used according to the federal statutes, regulations, and the terms and conditions of the federal award. Recipient account information must include identifying information such as the agency the funds were received from, federal agency awarding those funds, the federal fiscal year in which the funds were received, and the Catalog of Federal Domestic Assistance (CFDA) title and number.

Costs must be reported on an accrual basis at least quarterly to IWD. The Recipient is not required to establish books of account on an accrual basis, but must be able to supplement their books of account with sufficient information and documentation to allow quarterly accrual reporting. The books of account must include information regarding funds authorized, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation. Assets must be safeguarded and ensure that they are being used for the intent and purposes of the WIOA programs. Written financial management procedures and policies must be in place for each Recipient.

Internal Controls

Each Recipient must maintain an effective internal control system that provides reasonable assurance that funds are managed in compliance with federal statutes, regulations, terms of the federal award, terms of the agreement between IWD, local boards and the Recipient, and the WIOA Handbook. Compliance includes following the "Standards for Internal Control in the Federal Government" (issued by the Comptroller General of the U.S.) and "Internal Control Integrated Framework" (issued by the Committee of Sponsoring Organizations of the Treadway Commission).

Bonds

Fidelity bonding coverage is required in order to ensure that the Recipient has protection in place for federal interests invested in the programs. The insurance company must hold certification of authority as acceptable sureties, as prescribed in "Surety Companies Doing Business with the United States", CFR Part 223.

Funding Liability

There are multiple levels of responsibility and liability for the funds expended through the WIOA program. The hierarchy is as follows:

1. IWD is responsible to the federal government for all funds drawn against the Adult, Youth and Dislocated Worker programs;
2. The local Chief Elected Officials (CEO) board has liability for all funds allocated to the various local regions. Any costs found to be unallowable at the local level, must be repaid by the CEO board to IWD;
3. The local WIOA One-Stop Service Providers (Recipients) are responsible for the repayment of any unallowable costs, to the local CEO board;
4. Fiscal Agents have limited liability to the CEO board. In the event that unallowable costs are found by IWD to be the fault of the Fiscal Agent, then the Fiscal Agent is liable to the CEO board;
5. WIOA Subrecipients are liable to the local Recipient from which they contracted, for any costs found to be unallowable; and
6. Vendors have no liability for funds, so long as the goods or services delivered are in accordance with the agreements made by either IWD, local boards, Recipients or Subrecipients. Vendors are entities that do not provide any direct services to participants.

A contractual agreement shall be made between IWD and the local CEO board that outlines these responsibilities/liabilities between the two entities, in the event that IWD handles the responsibility of writing local Recipient or Fiscal Agent agreements on behalf of the local boards. The agreement shall clearly state the liability for the local funds allocated, the oversight and monitoring responsibilities of the local boards and the required structure of each local board.

Payments

Payments by IWD to the Recipient must be done in a manner that ensures that the receipt of funds is timed in a manner that minimizes the time elapsing between the receipt and the disbursement of those funds. IWD will generally pay out funds on Friday of each week, unless holidays cause us to move forward or back, the date of the release of those funds. The Recipient should make arrangements to disburse funds consistent with the dates of receipt. If these policies are not followed by the Recipient or other non-compliance is found in regards to a Recipient; IWD may impose restrictions on payments, such that they are made on a reimbursement basis.

Program Income

Recipients are encouraged to earn income to defray program costs where appropriate. Program Income earned by a Recipient may include:

- a. Fees for services performed or conferences;
- b. Use or rental of property or equipment;
- c. Sale of commodities or items fabricated under a contract; and
- d. Revenue received that is in excess of expenditures for services rendered;

Program income reportable to IWD shall be those funds received in excess of the amount expended on generating the income. The "Addition" method of tracking Program Income is used for all WIOA programs. Program income must be reported separately to IWD on the monthly Financial Status Reports (FSRs) and may only be used for allowable goods and services as described in the Cost Categories and Limitations section of the WIOA Handbook and on the program that generated the income. The sale of real property or equipment is not considered Program Income. Real Property disposition must be reported to IWD and in turn to the federal awarding agency for a determination of the applicable guidelines to follow. Equipment disposal must be reported to IWD for a determination of how to account for any proceeds if sold.

Real Property, Equipment and Intangible Property

No real property will be purchased from funds from the WIOA program.

Equipment with a unit acquisition value of \$5,000 or more will require prior approval from IWD. If allowed, the equipment must be maintained on inventory and the Recipient shall ensure that it has safeguarded those assets, including any applicable insurance as protection from loss. At least annually, a physical inventory of property shall be conducted by the Recipient. Equipment must be used for the intent of the WIOA program from which it was purchased. If no longer necessary for those purposes, the Recipient shall contact IWD for further instructions on either disposal or use by other programs. IWD will make the determination in compliance with section 200.313 of 2 CFR, Uniform Guide.

Intangible property shall follow the guidelines established for state held intangible property. Intangible property which cost \$500,000 or more shall be considered inventory and included on a property inventory. Generally, intangible assets are software development related items, for WIOA purposes and rarely occur at the Recipient level. However, they must be addressed in this section in accordance with 2 CFR, Part 200 guidelines. Some intangible property may take months or years to fully develop. Therefore, the Recipient will need to determine in advance, whether or not a particular item could exceed \$500,000 by the time it is completed and track all related start up and completion costs associated with this asset. Then include such as reportable property inventory.

Conflict of Interest

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by these federal funds if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, the entity may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. Violations of such standards by officers, employees, or agents may result in such actions by IWD that result in the disallowance of costs and or termination of the agreement which has been written with the Service Provider.

Reasonableness

Before directly or indirectly allocating an expense to these programs, the Recipient must first determine if the cost is reasonable in nature. The cost must not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The Recipient must be able to answer the following questions in the affirmative:

1. Is the cost an ordinary and necessary occurrence for the operation and performance of the program?
2. Does the expense appear to be a sound business practice with arm's-length bargaining and meets the terms and conditions of the agreement with IWD?
3. Has the Recipient acted with prudence in the circumstances considering their responsibilities to the entity, its employees, students where applicable, membership, the public and IWD?
4. Is the recipient purchasing goods or services at the current market price? Is the Recipient deviating from their established practices and policies while incurring the cost and therefore, unjustifiably increasing the costs charged to the program?
5. Is there any appearance of a conflict of interest between the Recipient and the vendor, subcontractor or other entity from which the goods or services are being procured?

Salary Limitations

No salaries shall be paid to an individual that charges time either directly or indirectly against the WIOA programs, that exceeds the Executive Level II of the federal executive pay scale. This is true regardless of whether the individual charges all or a portion of their salary directly or indirectly against these programs. WIOA shall not pay a portion that would calculate out to an annual full compensation to an individual that is in excess of the Executive Level II pay.

Cost Allocation

This section includes guidelines for Indirect Cost Rates, Resource Sharing and Cost Allocation Plans.

Indirect Cost Rates

The Uniform Guide found in 2 CFR, Part 200, identifies the requirements for the use of a federally approved indirect cost rate or a de minimus rate. The Council on Financial Assistance Reform (COFAR) developed the Uniform Guide on behalf of the Office of Management and Budget (OMB). These policies are outlined in section 200.414 of the Uniform Guide. Additionally, COFAR released a "Frequently Asked Questions" (FAQ) which specifically states, "If the subrecipient already has a negotiated [Indirect] rate with the federal government, the negotiated rate must be used." Therefore, if the Recipient does in fact have a federally approved indirect cost rate, they shall apply such rate against the funds received from WIOA. This may result in the Recipient exhausting their WIOA administrative funds before the annual agreement with IWD is completed. At which point, a cash match of funds from the Recipient, may be necessary to complete the agreement period. Those matching funds must be reported on the monthly FSRs to IWD. Matching funds must be from a non-federal funding source.

If the Recipient has never had a federally approved indirect cost rate, a de minimis rate of 10% of modified total direct costs, may be negotiated with IWD. If the local entity has received previous indirect cost rates, either a new indirect rate must be approved by the federal government or the Recipient must have a written comprehensive Cost Allocation Plan that includes how costs ordinarily classified as indirect, will be allocated to the various programs.

Resource Sharing

There are two types of resource sharing that can occur at any level from the federal government down to the subrecipient level.

- a. First, how are costs which benefit multiple partners in the One-Stop Office, allocated between the partners?
 - b. Secondly, how does the Recipient allocate costs within their entity when the costs benefit multiple programs administered?
- a. For shared costs among partners, a Resource Sharing Agreement is necessary. Section 679.130 of the WIOA regulations states, "Policies relating to the appropriate roles and contributions of entities carrying out one-stop partner programs within the one-stop delivery system, including approaches to facilitating equitable and efficient cost allocation in the system." Each partner must provide an equitable amount of funding to support facilities and overhead costs that benefit multiple partners. This may include the actual rental cost of the facility, maintenance, repairs, remodeling, insurance, taxes, utilities, janitorial and any other upkeep expenditures for the building and grounds.

Additionally, there may be costs shared for such items as supplies, equipment, printing, phone, computer hardware and software, and in some cases, staffing expenditures.

The Resource Sharing agreement shall provide for a listing of each service that is shared, the partners benefitting from that expense and the contributions that will be made by each partner. The basis for the allocation must be consistent with the methods outlined in part b. and agreed to by all partners in writing and included in the Memorandum of Understanding (MOU). This document must be updated at least annually and at any other interval where a material change in the distribution is occurring (such as a new partner entering the facility).

- b. The Recipient must have a written cost allocation plan that identifies how expenses which benefit multiple programs or cost categories, are to be distributed. Allowable cost allocation methods are discussed below. Any other method chosen, must be approved in writing by IWD, prior to implementation.

Time Reporting

Joint costs (benefitting multiple programs or cost categories) may be allocated according to percentages of staff time spent on each program or cost category. In order to use staff time sheets as a basis for allocating joint costs, staff must record time spent working on specific programs or cost categories. At a minimum, time reports must be completed on a monthly basis. They shall include either a daily recap of hours worked on each activity or hours worked on each activity during the time period in which they are being paid. For example, if paid on a weekly basis, then a recap of hours worked for that week. Same would be true if paid bi-weekly, semi-monthly or monthly. The time reporting can then be used to make the following allocations:

1. Group Allocations – Combining all time sheets for the month to arrive at group percentages by program and cost category (where applicable). The group rates should be used for all joint costs allocable to all the programs and cost categories. This type of allocation could be used for supplies, phone systems or equipment purchases where all staff benefit from the purchase being made. In some cases infrastructure costs may be allocated based on staff time. However, it is important that you chose the method that appears to most accurately charge each program based on benefit received.
2. Category Allocations – Combining only the time sheets for the month for a particular program or cost category. This type of allocation could be used for costs considered to be only administrative, only programmatic or only benefitting one program but multiple cost categories within that program. For example, purchase of a new financial management package can only be charged to administration and therefore only the administrative time is used in cost allocation. Outreach brochures would be considered only program

cost and therefore, could be allocated based on only the program staff time allocations or even just one particular program's staff allocations if the brochures are that specific in terms of what customers are being reached.

3. Individual Allocations – When something is purchased or the cost is incurred for the benefit of one individual, then only that individual's time allocations should be used to allocate the cost. This would include staff salaries, fringe benefits and travel. It may also include supplies and equipment if purchased for just one individual.
4. Location Allocations – If the Recipient has more than one location where staff are domiciled, it may be necessary to subdivide time allocation reports between the various locations before calculating percentages and distributing costs. For example if each location purchases their own supplies or equipment and then the allocation should not be made based on all staff within the entity and only the staff at that location.

When using staff time distributions to allocate costs, the previous month's timesheets or the previous quarter's timesheets, may be used as the basis for the allocation. However, if the previous quarter's time sheets are used, the Recipient must still have individual time sheets for each month in the quarter. Preparing only one time sheet for the entire quarter is not allowable. The Resource Sharing Agreement would only include an estimate based on historical or future analysis of similar data.

Service Levels

It may be appropriate to determine the service levels of participants in the various programs and use that data to allocate an expense. Participant liability insurance is usually allocated on this basis. In this case, the most accurate method is to use the previous year's service levels to allocate the cost as most insurance policies are on an annual basis. This may not be the most advantageous method of allocating other expenses as the Recipient rarely has any control over the number of participants that might seek services. Whereas, the Recipient can dictate what programs staff will be working on and ensure their time is devoted accordingly.

Square Footage

Generally the most accurate method of distributing infrastructure costs of a building including the rent, janitorial, utilities, grounds, building maintenance, etc. The ratio of FTE's and how those FTE's have allocated their time in the past, plus the amount of space occupied by those individuals, is all taken into consideration to make the distribution. This should be recalculated at least quarterly, based on the previous three months of time distribution reports. It would need to be done based on the current and projected usage in order to be included in the Resource Sharing Agreement.

Usage Rates

Generally this is used for such things as copiers, where individuals can enter their own code for on the machine, prior to usage. This information is then tabulated on a monthly or quarterly basis and the allocations are made based on that data.

Cost Pooling

Cost pools may and should be developed for instances where pooling expenditures for distribution may save the Recipient time involved with the distribution of costs and still result in an equitable and allowable allocation of costs to the benefitting cost objectives.

Cost pools are generally used to distribute costs that jointly benefit multiple cost objectives, but would require effort that exceeds the benefit, to individually allocate each invoice or payment. Cost pools may include but are not limited to:

- a. A pool where the ratio of either administrative or program service staff time is used to distribute the overhead costs of administration or program cost categories (Admin ratio for admin costs and program ratio for program costs);
- b. A pool where the ratio of the combined administrative and program service staff time is used to distribute the overhead costs to both administration and program cost categories simultaneously;
- c. A pool where the ratio of the program service staff time is used to allocate the administrative overhead costs;
- d. A pool where the direct program service costs for participants is used to distribute administrative, program or combined administrative/program overhead costs;
- e. A pool of all One-Stop partner FTE's in order to allocate those costs which are shared by all partners; or
- f. A pool of the ratio of participants served by the various programs to allocate overhead costs (rarely suitable and usually only unique situations).

Other methods of cost pooling may be acceptable, but must be approved by IWD before implementation, to ensure that the pool appears to allocate costs in accordance with the guidelines established in the WIOA Handbook and federal regulations.

Cost Allocation Plans

Each Recipient must develop a written Cost Allocation Plan, regardless of whether or not they have a federally approved indirect cost rate or and IWD approved de minimus rate. Other direct costs are still being allocated by either one of the methods outlined above or some other method approved by IWD. The allocation plan must include:

- a. The time period covered by the plan (no less frequently than annually);
- b. Programs included in the plan;
- c. Basis to be used for allocations;
- d. Types of costs included in the allocations;

- e. Exceptions to the general policies; and
- f. Be in compliance with the Uniform Guide, 2 CFR, Part 200, WIOA regulations, WIOA Handbook and any WIOA agreements with the Recipient.

The basis must distribute costs in a fair and equitable manner without distorting the results. This requires that the costs be as causally related as possible to the types of costs being allocated so that benefit can be measured as accurately as possible. The plan must be in compliance with Generally Accepted Accounting Principles and consistently applied during the period covered by the plan. The plan must not include any costs ultimately being allocated based on budgets, available funds, solely on job descriptions or any other estimated basis. The plan must be able to accommodate and withstand changes in funding during the period covered. The plan must be made available to IWD, auditors and any federal level authorities with oversight responsibilities for the WIOA program.

Financial Reporting

IWD shall establish systems for the reporting of revenue and expenditures as well as the drawdown of funds for the WIOA programs. Monthly FSRs shall be due by the 20th of each month. The reports shall include expenditures by program and cost categories, identified by IWD, as well as revenue by program. In addition, program income earned and expended shall be reported on a monthly basis. At a minimum, the quarterly reports shall be prepared on an accrual basis. A final report of expenditures shall be due no later than 45 days after the end of the contract period.

Unless otherwise instructed by IWD, the drawdown of funds necessary for each week shall be requested no later than each Friday at Noon. IWD will establish a system for reporting such requests. No Recipient shall request funds for more than their immediate cash needs. Final requests for funds must be submitted along with the final FSR each fiscal year.

Matching

Cash matching funds may be used by the recipient when other direct funding from the program is no longer available during a fiscal year. Matching funds must be used in accordance with the same rules as imposed for the program and cost category used for direct charges to WIOA. IWD must be able to track those expenditures back to the Recipient's books of account to ensure compliance with WIOA requirements. Matching is to be reported monthly to IWD on the FSR and by the same program and cost category from which the costs were incurred. Matching may include any indirect costs that could have been charged against the program but were not due to such constraints as limited administrative dollars available for a direct charge.

COST CATEGORIES AND LIMITATIONS

The purpose of this section is to identify and define cost categories applicable to each WIOA program. Expenditures must be tracked and reported to IWD by these categories with certain limitations on acceptable levels of cost. There are some overall cost limitations that apply against the total allocations a local area receives for Adult and Dislocated Worker programs. They include:

- a. Not more than 10% of the combined Adult and Dislocated Worker total allocation to a local area, may be used for transitional jobs;
- b. Not more than 20% of the combined Adult and Dislocated Worker total allocations to a local area, may be used for Incumbent Worker Training; and
- c. Not more than 10% of the combined Adult and Dislocated Worker total allocation to a local area, may be used for Pay-for-Performance contracting.

The administrative funds are included in the calculations made for a-c above. In addition, up to 100% of the Adult and Dislocated Worker funds may be moved from one program to the other. This option does not apply to the Youth program. Requests to move funding must be made by local boards and submitted to IWD. Requests must be received no later than May 15th of each year, unless otherwise waived during a given fiscal year, via an IWD Field Memo.

The programs/categories included in this section are:

- I. Administration;
- II. Adult Program;
- III. Dislocated Worker Program;
- IV. Youth Program;
- V. Rapid Response; and
- VI. Statewide Activities.

I. Administration

A maximum of 10% of each regional allocation of Adult, Youth and Dislocated Worker funds may be expended on administration. Separate allocations of PY and FY funds will be made available to each region for Adult and Dislocated Worker. The Youth program has only one allocation per year and is designated as PY funding. The three administrative allocations can and will be combined and reported to IWD in total. However, PY and FY funds must be separately tracked on the Financial Status Reports (FSRs). Not all agreements may have the maximum administration and therefore, your actual agreement must be reviewed to determine what allocation of administration, has been distributed.

Administrative costs are defined in the WIOA regulations and include:

- a. Accounting, budgeting, financial and cash management;

- b. Procurement and purchasing functions;
- c. Property management functions;
- d. Payroll functions;
- e. Coordinating the resolution of findings arising from audits, reviews, investigations and Incident Reports;
- f. Audit functions;
- g. General legal services;
- h. Developing systems and procedures, including information systems, required for these administrative functions;
- i. Fiscal Agent responsibilities;
- j. Performing oversight and monitoring responsibilities related to WIOA administrative activity;
- k. Cost of goods and services required for administrative functions including goods and services such as rental or purchase of equipment, utilities, office supplies, postage, and rental and maintenance of office space;
- l. Travel costs incurred for official business in carrying out administrative activities or the overall management of the WIOA system;
- m. Costs of information systems related to administrative functions (personnel, procurement, purchasing, systems development and operating costs of such systems);
- n. Awards to subrecipients or contractors that are solely for the performance of administrative functions;
- o. Indirect Costs from either a federally approved indirect cost rate or a De Minimis rate negotiated with IWD (with some exceptions as noted below).

Personnel and related non-personnel costs of staff that perform both administrative and programmatic services or activities must be allocated to both based on a documented distribution of actual time worked or other equitable cost allocation methods.

Specific costs charged to an overhead or indirect cost pool that can be identified directly as program costs are to be charged to program costs. Except as provided for in a-n above, all costs are to be charged to program costs. They include:

- a. Continuous improvement activities are charged to program funds unless the activity to be improved fits the categories outlined in a-n;
- b. Tracking or monitoring participants and performance information;
- c. Employment statistics information, including job listing information, job skills information and demand occupation information;
- d. Performance and program cost information on eligible providers of training services, youth activities, and appropriate education activities;
- e. Local area performance information; and
- f. Information related to support services and unemployment insurance claims for program participants.

II. **Adult/Dislocated Worker Programs**

Adult and Dislocated Worker expenditures are to be incurred against only activities that are being provided to eligible individuals in each program, for career and training services. The Adult and Dislocated Worker program funds must be a minimum of 90% of the total allocation received by each area. These services may include:

- a. Salaries and Fringe costs for counselors or case managers that are directly involved in providing services to participants;
- b. Travel costs of those staff;
- c. Any other overhead costs directly associated with those staff;
- d. A proportionate share of other overhead that may be considered both administrative and programmatic in nature, so long as they are allocated to each category, based on a documented basis of benefits received as described in the Financial Management section of the WIOA Handbook;
- e. Prorated share of a federally approved indirect cost rate, so long as the Recipient can provide evidence that the rate included costs that can be classified as program and only the proportionate share of the rate related to program costs;
- f. Customized screening and referral of qualified participants in training services;
- g. Customized employment related services to employers, employer associations, or other such organizations on a fee-for-service basis;
- h. Implementation of a pay-for-performance contract strategy;
- i. Customer support to enable individuals with barriers to employment and veterans, navigate among multiple services and activities;
- j. Technical assistance for one-stop operators, one-stop partners, and eligible providers of training services, regarding, the provisions of services to individuals with disabilities in local areas, including the development and training of staff, the provision of outreach, intake, assessments, and service delivery, the coordination of services across providers and program, and the development of performance accountability measures;
- k. Child support enforcement activities of the state and local agencies;
- l. Child support services and assistance provided by the state and local agencies;
- m. Department of Agriculture, cooperative extension programs;
- n. To facilitate remote access to services provided through a one-stop delivery system, including facilitating access through the use of technology;

- o. Improve coordination between workforce investment activities and economic development activities carried out within the local area involved and to promote entrepreneurial skills training and microenterprise services;
- p. Improve services and linkages between the local workforce investment system and employers;
- q. Strengthen linkages between the one-stop delivery system and unemployment insurance programs;
- r. Training programs for displaced Homemakers and for individuals training for nontraditional occupations, in conjunction with programs operated in the local area;
- s. Activities to provide business services and strategies that meet the workforce investment needs of area employers;
- t. Activities to adjust the economic self-sufficiency standards;
- u. Improve coordination between employment and training activities and programs carried out in the local area for individual with disabilities;
- v. Implementation of promising services to workers and businesses, which may include support for education, training, skill upgrading and statewide learning advisors;
- w. Other activities as described in the Adult Program section of the WIOA Handbook;
- x. Support services including Needs Related Payments (NRP), Child Care, Dependent Care, Housing and Transportation. So long as those service cannot be provided by another program;
- y. On-the-Job Training Services (not to exceed 50% unless the Governor or the local board determines that a rate in excess of 50%, but not more than 75%, is necessary and consistent with section 680.730 of the WIOA regulations);
- z. Incumbent Worker Training;
 - aa. Transitional Jobs;
 - bb. Paid or unpaid Work Experience;
 - cc. Institutional Skills Training;
 - dd. Entrepreneurial Training;
 - ee. Incentive payments for recognition and achievement directly tied to training activities and work experience. This requires written policies that include goals that must be accomplished and aligned with local program policies;
 - ff. Local board direct involvement in actual partner services, such as customer service and the referral processes;
 - gg. Local board facilitation on the RFP processes for the adult/dislocated worker service provider;
 - hh. Local board direct involvement with the creation of customer service surveys to WIOA participants.

III.

Youth Program

Participants must be determined to be eligible for the Youth program, per definitions contained within this WIOA Handbook. A minimum of 90% of the funds allocated to a local area must be spent on Youth program costs. Expenditures for paid or unpaid Work Experience must be a minimum of 20% of the 90% program dollars. Administration is excluded from this particular calculation.

Work Experience may include staff time devoted towards the potential placement of and oversight of those participants. Only pre-Work Experience staff time (job development or required preparation courses) and staff time devoted to those participants during the Work Experience can be included as a Work Experience expense. Staff time study information would need to include a breakdown of In-School/Out-of-School Youth Work Experience hours vs. In-School/Out-of-School non-Work Experience.

A minimum of 75% of the total allocation to each local area for Youth, must be spent on out-of-school youth, unless otherwise directed by IWD. The local board may reserve a maximum of 10% of the total local allocation for pay-for-performance. In addition, 5% of all participants served do not have to meet the low-income criteria. However, they must meet all of the other eligibility requirements for Youth. Youth services that can be provided to Youth are:

- a. Tutoring, study skills training, instruction, dropout prevention and recovery;
- b. Alternative secondary school services;
- c. Paid and unpaid work experience including Summer Employment, Pre-apprenticeship, internship/job shadowing and OJT;
- d. Occupational skill training;
- e. Education offered concurrently with training for a specific occupation or occupational cluster;
- f. Leadership development, community service, peer centered activities and social/civic behavior;
- g. Adult mentoring of at least 12 months;
- h. Follow-up services for not less than 12 months after completion;
- i. Comprehensive guidance and counseling;
- j. Financial literacy education;
- k. Entrepreneurial skills training;
- l. Labor market and employment information;
- m. Preparation for transition to post-secondary education training;
- n. Support services including linkages to community services, transportation, child and dependent care, housing, NRP, educational training, reasonable accommodations for youth with disabilities, referrals to health care and assistance with uniforms or other appropriate attire, work related tools, including eye glasses and eye protection gear;

- o. Local board direct involvement in actual partner services, such as customer service and the referral processes;
- p. Local board facilitation on the RFP processes for the Youth service provider;
- q. Local board direct involvement with the creation of customer service surveys to WIOA participants.

IV. **Rapid Response**

The purpose of Rapid Response (RR) is to promote recovery and vitality by developing an ongoing, comprehensive approach to identifying, planning for, responding to layoffs and dislocations, and preventing or minimizing their impacts on workers, businesses and communities. IWD may reserve up to 25% of the statewide Dislocated Worker allocation for providing these services. Once IWD has determined an adequate level of RR funding, the remaining balance can be distributed via formula to the local areas or reserved and used to provide local areas with additional funding if they experience increases of unemployment due to natural disasters, layoffs or other events, for provision of direct career services to participants if there are not adequate funds available to assist the dislocated workers.

A local area may request RR funding from IWD by formally applying for those funds through the Bureau Chief, Program Operations. IWD shall establish criteria necessary to determine the reasonableness of the request and amount of funding to be obligated. IWD will have a RR unit to carry out statewide RR activities and to oversee RR activities undertaken by a designated state entity, local board, or the Chief elected Officials for affected local areas. Section 682.330 of the WIOA regulations, identify the allowable activities for the use of RR funds.

V. **Statewide Activities (excluding Rapid Response)**

For the first fiscal year of the WIOA program, IWD may reserve up to 10% of the total Adult, Youth and Dislocated Worker allocations in order to provide Statewide Activities. This percentage may increase in subsequent years depending on federal appropriation language as the WIOA Act does allow for a 15% Statewide Activity level. Of this total, 5% from each program is reserved for state administrative activities as identified in section 683.215 of the WIOA regulations and identified in this section under "I". The funds may be combined and used for any of the WIOA programs.

The remaining 5% (for the first year of WIOA) must be used on activities identified in section 682.200 and can be used for activities listed in section 682.210 of the WIOA regulations. Again, this percentage may increase to 10% in subsequent years. The funds may be combined and used for any of the WIOA programs. However, if Statewide Activity funds are spent directly on services to youth, the 75% out-of-school requirement must be enforced on that particular project.

VI. Annual Expenditure Rates

- A. Administrative Funds – WIOA administration is only available at the local area level for the first two years after being awarded by the state. The remaining funds unexpended at the end of year two are recaptured by the state. No minimum expenditure requirement exist in year one and any balance remaining is carried into the second year by the local area. Administrative funds include the combined total allocation of Adult, Youth and Dislocated Worker for a given state fiscal year.
- B. Adult and Dislocated Worker Program Funds - WIOA program dollars are only available to the local area in the first two years of award. Further restrictions are that 100% of the 3 month funds must be expended in the year of distribution to the local area. The 9 month allocations of funds have a 75% expenditure/obligation requirement in the first year awarded locally. However, the combination of 3 month and 9 month expenditures/obligations must also reach 80% in the first year awarded. The balance of unexpended/unobligated funds from year one, must be expended by the end of the second year of availability. Any balance remaining is recaptured by the state.
- C. Youth Program Funds – WIOA program dollars are provided in one 12 month allocation each year. Of the total awarded to a local area, 80% of the funds must be expended/obligated by June 30th of the first full state fiscal year of availability. The remaining balance must be expended by the end of the second full state fiscal year of availability. Any balance remaining at that time will be recaptured by the state.

VII. Recaptured Funds

Funds recaptured by the state may be used for the following purposes:

- A. If recaptured after the first year of availability, the amounts recaptured shall be distributed to those local areas that fulfilled the requirements of section VI(B) or (C), whichever is applicable. The redistribution shall be based upon the formula that was used for the year those funds were originally distributed. Therefore, a local area must have met the requirements for the Adult program in section VI(B) to receive any Adult recaptured funds. A local area must have met the requirements for the Dislocated Worker program in section VI(B) to receive any Dislocated Worker recaptured funds. A local area must have met the requirements for the Youth program in section VI(C) to receive any Youth recaptured funds.
- B. If recaptured after the second year of availability, the state may either distribute those funds to any local area(s) that fully expended their original allocation(s) in the first two years of availability or the state may use those funds consistent with the rules and regulations which apply to state set aside funding. Redistribution of third year funds to a local area shall not be subject to the formula distribution requirements which exist for year 1 and 2 redistributions. However, they are subject to state procurement policies.

April 2, 2016 Update

AUDIT RESOLUTION

For purposes of this section, a Auditee is defined as a For-Profit or commercial entity, state or local government, non-profit, institutes of higher education, Indian tribes or foreign public entity. This section contains the procedures used by IWD in the resolution of audits conducted on Auditees of WIOA funds. Similar rules and procedures must be adopted by the Auditee if they have contracted out WIOA funds to a subrecipient. In no case shall the resolution process be more than 180 days from the date an audit is received to the date a Final Determination letter is issued by IWD or by the Auditee to a subrecipient. Starting with fiscal year's beginning on or after December 26, 2014, an Auditee that expends \$750,000 or more during its fiscal year must have a Single Audit or Program Specific Audit conducted. Program specific audits are allowed at this expenditure level if the Auditee has only one federal program it operated during the audit period. Any Auditee that expended a minimum of \$100,000 of WIOA funds during their fiscal year must have at least a program specific audit. The cost of a program audit is not an allowable direct charge to WIOA programs. Audits are to be conducted annually. Below are the procedures to be followed for the resolution of all audits.

Initial Determination

If applicable, IWD will issue an Initial Determination within thirty (30) days of receipt of an audit report. The Initial Determination will include any findings within the audit that appear to have an impact or relationship with the WIOA funds (or any other funds passed thru from IWD) that were disbursed to the Auditee. In addition, IWD will address any concerns regarding the Opinion Letter, Schedule of Federal Financial Assistance, Compliance/Internal Controls (General and major program), Notes to the Financial Statements, Management Letter (if applicable) or other audit schedules. The finding and IWD comment will be included in the report. Space will be provided for the Auditee to respond to those findings. The Auditee will be allowed thirty (30) days from receipt of the Initial Determination to respond in writing to IWD. The Auditee may request an extension of time to respond, in writing, so long as this is done within the thirty (30) day response period. In the event there are either no findings or none that require a response from the Auditee, the Initial Determination stage will not be necessary and IWD will issue a Final Determination.

Final Determination

Within thirty (30) days after due date of the Auditee response, IWD will issue a Final Determination letter. The Final Determination shall include the original finding, IWD comment, the Auditee response and IWD's final decision. If costs were questioned in the Initial Determination, IWD will state the amount of those costs to be allowed and disallowed. An explanation as to this determination will be included in the final decision section of the report. The Final Determination shall be provided to the Chair of the Chief Elected Officials (CEO) for that region, responsible for those funds. Liability to IWD for the use of the funds and for disallowances of those funds shall rest with the CEO board. The CEO board has the right to enforce repayment of the disallowance on the Auditee or accept responsibility and repayment by the CEO board. No disallowances shall be waived by IWD, unless an Appeal decision is in

favor of the Auditee. In the event that IWD finds that costs are disallowed and either rejects an appeal or no appeal is filed, the debt collection process shall begin. See the Debt Collection section of the WIOA Handbook for further information.

Appeals

The Auditee may submit an appeal of a Final Determination within fifteen (15) calendar days of the date of the final report. The appeal must be submitted to the Executive Director of IWD. The request to appeal must be submitted in writing and include a copy of the Final Determination and the basis for the appeal.

Appeals will be reviewed by a three member Appeal Committee at IWD within thirty (30) days of receipt and shall include the Executive Director and two other IWD employees designated by the Executive Director. One of the two individuals selected must have knowledge of the WIOA Financial Management rules and regulations, while the other must have knowledge of the WIOA program rules and regulations. None of the individuals involved in the review of the appeal, may have been involved in the original decision that led to the appeal.

A decision on the appeal will be rendered by a majority vote of the three-member committee. The decision-making process may or may not include an actual meeting of all parties involved, depending on the particular situation, including whether or not additional documentation is necessary or if an in-person meeting may expedite the process. A final decision must be made in writing within thirty (30) days of the receipt of an appeal. This decision is final and may not be taken to any additional levels above the three-member committee. Any disallowance of costs, shall result in IWD initiating the debt collection process. See the Debt Collection section of the WIOA Handbook for further information.

DEBT COLLECTION

All references to "Recipient" in this section, apply to both the "Auditee" in the Audit Resolution section and the "Recipient" as identified in the Monitoring section of the WIOA Handbook.

Establishing a Debt

Debt collection shall begin once a Recipient no longer has an appeal outstanding from either Fiscal/Program monitoring or Audit Resolution. Debt collection may not always be limited to one of those two functions within IWD. There are other events which may cause a Recipient to incur disallowed costs. Those cases will be handled consistent with the procedures established in this section. All debts arising from the misuse of funds contractually obligated to the Recipient by IWD for WIOA purposes are the responsibility of the Chief Elected Official (CEO) for that local service area. IWD will assist in the debt collection by following the procedures outlined below. However, the final responsibility for the disallowed costs, resides with the CEO.

Initial Demand

No earlier than fifteen (15) days or later than twenty (20) days after a debt has been established, IWD shall prepare and submit a request for repayment from the Recipient. The local CEO board shall be cc'd on that written request. Such requests shall be sent certified return receipt. The Initial Demand shall include the original date and notification of cost being disallowed. That notification may have been from a Final Determination of an audit, Final Decision of a monitoring or another form of communication that was provided to the Recipient. The Recipient shall have fifteen (15) days from the receipt of the Initial Demand letter, to repay the amount due.

Final Demand

If the Recipient fails to repay the debt in full, within the time period allowed, IWD shall prepare a Final Demand letter. This letter must be sent no later than ten (10) days after the Recipient has exhausted the time allowed according to the Initial Demand. The Final Demand letter will inform the Recipient of the possible next steps that would be taken by IWD, if the debt is not repaid within fifteen (15) days of receipt. These steps may include legal action as well as having the CEO remedy the instance by reimbursing IWD. Again, this letter will be sent certified return receipt and cc'd to the local CEO.

Methods of Payment

IWD has three methods of repayment that may be considered:

- a. Payment in full at the time the funds are requested from the Recipient. This must include identifying either the Final Determination, Final Monitoring report or Debt Collection notice received. It must also include the amount, name of the individual WIOA program and cost category from which the debt was determined;

- b. IWD may consider a repayment plan, so long as the repayment plan does not exceed a twelve month repayment period. In this instance, IWD shall require a written statement from the highest ranking officer within the entity that identifies the amount to be paid back each month, date due and date final payment is due. Delinquent payments shall void any such agreement and the full remaining balance shall be due immediately. Again, the payments must include the amount, name of the individual WIOA program and cost category from which the debt was determined; or
- c. IWD may consider repayment through "Stand-in Costs". Stand-in-Costs must be expenditures not charged against any other federal program that could have been allowable costs against the specific WIOA program and cost category from which the disallowance occurred. The costs must also have been incurred during the same time period as the as were the costs disallowed. Documentation must be made available for examination by IWD, to verify that the costs would have been allowable. IWD is not required to accept Stand-in-Costs and will consider this on a case by case basis.

MONITORING

Federal regulations assign responsibility for financial and program compliance monitoring to non-federal agencies that receive and distribute federal program funds. The state must monitor the performance of providers in complying with the terms of grants, contracts, or other agreements made pursuant to WIOA. IWD has established policies and procedures to be followed in the performance of that monitoring, in compliance with 2 CRF, Part 200 (Uniform Guide) and the WIOA regulations/Act. The requirements are intended to promote the effective and allowable use of public funds while providing procedures to ensure that the objectives of the programs are being met.

Achievement of program goals and program efficiency are the result of sound planning and management decisions. Monitoring provides the state and the local areas with a means of evaluating this process. Recommendations for corrective action are tools that IWD uses to provide technical assistance on deficient areas of operations. This section outlines the monitoring responsibilities of IWD, local board(s), the One-Stop Service Provider and Fiscal Agents (where applicable and different from the One-Stop Service Provider) for each of the WIOA programs.

State Monitoring Responsibilities

IWD will conduct or ensure that three types of monitoring are performed:

- A. Financial;
- B. Programmatic (including Quality Assurance); and
- C. Risk Assessment.

The following is an outline of those three types of reviews, the area of responsibility within IWD, and the programs included in those reviews. The One-Stop Service Provider and Fiscal Agent are referred to in these sections as the "Recipient"

A. Financial Compliance Reviews

Annually, two financial compliance reviews will be conducted by the Administrative Services Division, Financial Management Bureau. The on-site reviews will be of all programs administered through written agreements involving IWD and the Recipient. Monitoring will be limited to those Recipients of IWD that receive \$50,000 or more during the fiscal year. The monitoring will be performed to ensure compliance with, but is not limited to, the following:

1. Workforce Innovation and Opportunity Act (WIOA) Handbook;
2. Contractual agreements with IWD;
3. Generally Accepted Accounting Principles;
4. WIOA regulations/Act;
5. Local Resource Sharing Agreements;

6. Cost Allocation Plans;
7. 2 CFR, Part 200, Uniform Guide; and
8. Local Service Plans.

The financial monitoring shall include a review of:

1. Internal controls;
2. Sampling of participant payments;
3. Sampling of non-participant overhead payments (including adherence to the local cost allocation plan, WIOA Handbook and Resource Sharing agreement);
4. Reconciliation of reported expenditures and revenue;
5. Review of previous monitoring findings;
6. Review of funds obligated by participant and by program;
7. Review and sampling of property inventory; and
8. Any other financial activity the monitor deems appropriate and related to the funds contracted.

B. Risk Assessment

2 CFR, Part 200 identifies the state's responsibility to perform a Risk Assessment prior to awarding funds to any Recipient. The factors to be reviewed must include:

- a. Prior experience with same or similar activities;
- b. Results of previous audits;
- c. New personnel or new systems; and
- d. Results of federal agency monitoring.

Additionally, the state can incorporate other factors into this review that may include but are not limited to:

- a. A history of late reporting;
- b. Prior state monitoring reports;
- c. Determining if proper internal controls are in place; and
- d. Other factors the state determines to be applicable.

Based on this Risk Assessment, the state may impose restrictions such as paying on a reimbursement basis, operating the program in phases/benchmarks, requiring more detailed financial reports, requiring additional monitoring, training or technical assistance, or requiring additional prior approvals.

The Risk Assessment may be performed by IWD or another state agency. Since a Recipient may have multiple agreements with multiple state agencies, the state will develop a system that ensures that a Risk Assessment is not performed on the same Recipient by multiple state agencies. Risk Assessments will begin during fiscal year 2016.

Reporting, Follow-up and Appeals

After completion of an on-site monitoring visit, formal reports, follow-up and an Appeal process are necessary for both financial and program monitoring and involves three separate steps.

I. Draft Report

Separate Draft Reports are completed by the applicable monitoring team for each on-site visit. The report shall include:

- a. A description of findings which includes specific references to the standards, policies or procedures which have been violated;
- b. If necessary, recommended and required corrective action to be implemented by the Recipient;
- c. A description of any questioned costs, including the amount;
- d. Comments the monitor believes are noteworthy regarding best practices done by the Recipient that are material enough in nature to warrant including in the report; and
- e. Time frames for completing any corrective action and responding to the Draft Report.

Draft Reports are to be completed and submitted by IWD no later than fifteen (15) calendar days after completion of the on-site visit. The Recipient will ensure that the responses are compiled and submitted to the appropriate individual at IWD within fifteen (15) calendar days after receipt by the Recipient. In the event that no findings or comments are made or a response from the Recipient is not necessary, a Final Report will be released within fifteen (15) calendar days after the on-site visit is completed.

II. Final Report

A Final Report will be issued to the Recipient within fifteen (15) calendar days after the receipt of the response from the Recipient. The Final Report will also be sent to the Chairs of the local boards responsible for the regional WIOA funds. The Final Report will state IWD's decision on all findings that required a response and the notification of the right to appeal the Final Report. If any findings are unresolved or if costs are disallowed, the letter will also include:

- a. A description of the unresolved finding;
- b. A citation or reference to the applicable regulations or policies on which the finding was based;
- c. The final decision by IWD on each unresolved finding; and
- d. If there are disallowed costs, the amount of costs disallowed and notification that the debt collection process will begin.

Both the Draft and Final Reports for financial monitoring will be signed by the Bureau Chief for Financial Management at IWD. The Draft and Final Reports for program monitoring will be signed by the Bureau Chief, Program Operations at IWD. Responses must be signed by the individual addressed on the Draft Report.

III. Appeals

The Recipient may submit an appeal of a Final Decision within fifteen (15) calendar days of the date of the final report. The appeal must be submitted in writing to the Division Administrator, Administrative Services at IWD and include a copy of the Final Decision and the basis for the appeal.

Appeals will be reviewed by a three member Appeal Committee at IWD within thirty (30) days of receipt and shall include the Division Administrator, Administrative Services and two other IWD employees. One of the two individuals selected must have knowledge of the WIOA Financial Management rules and regulations, while the other must have knowledge of the WIOA program rules and regulations. None of the individuals involved in the review of the appeal, may have been involved in the original decision that led to the appeal.

A decision on the appeal will be rendered by a majority vote of the three-member committee. The decision-making process may or may not include an actual meeting of all parties involved, depending on the particular situation, including whether or not additional documentation is necessary or if an in-person meeting may expedite the process. A final decision must be made in writing within thirty (30) days of the receipt of an appeal. This decision is final and may not be taken to any additional levels above the three-member committee. Any disallowance of costs, shall result in IWD initiating the debt collection process. See the Debt Collection section of the WIOA Handbook for further information.

IV. Follow-up

Follow-up on findings identified will be conducted during the following on-site review. However, this will depend on the severity of the finding, as certain issues, if determined to be a material non-compliance in nature, may require a more frequent visit than to wait for the next monitoring cycle. Otherwise, a normal follow-up review of corrective actions will be done during the next cycle of on-site visits. Findings that do not appear to have been corrected since the last on-site visit may result in further action by IWD. This must also include guidelines similar to the section on Reporting, Follow-up and Appeals.

A decision on the appeal will be rendered by a majority vote of the three-member committee. The decision-making process may or may not include an actual meeting of all parties involved, depending on the particular situation, including whether or not additional documentation is necessary or if an in-person meeting may expedite the

process. A final decision must be made in writing within thirty (30) days of the receipt of an appeal. This decision is final and may not be taken to any additional levels above the three-member committee. Any disallowance of costs, shall result in IWD initiating the debt collection process. See the Debt Collection section of the WIOA Handbook for further information.

Regional Monitoring Responsibilities

WIOA Act and the Uniform Guide found in 2 CFR, Part 200, both identify the responsibility for local board(s) and Recipient monitoring of activity.

The Chief Elected Officials are liable for the funding passed through to a local Recipient. Therefore, it is critical that proper oversight be performed by not only IWD, but also the local board(s). This oversight would include holding periodic meetings that include the local Recipients and provide updates on that status of services being provided. This should include periodic reports of financial and programmatic activity including budget to expense comparisons and updates on performance goal status. A copy of this WIOA Handbook and all amendments must be provided to the local board members. In addition, final monitoring reports and annual audits should be provided to all board members as they are completed. The board should establish other criteria to be analyzed periodically to determine the effectiveness of the program and ensure that the local plans and contractual agreements have been complied with by the Recipient.

The Recipient of funds shall establish a written system on internal review and analysis that ensures that they are complying with the WIOA regulations as well as their contractual agreements. This review shall include:

1. Random sample of all subrecipient agreements under \$25,000;
2. Random sample of all participant files from each of the WIOA programs that includes review of eligibility information, assessments, obligations, case management notes, etc.;
3. Random sample of all participant payments made for training and support services; and
4. Random sample of all non-participant overhead payments.

Additionally, a system similar to that which is described as IWD's monitoring in sections A and B, must be developed in writing and used by the Recipient in the event that they contract out funds to a Subrecipient that are in excess of \$25,000.

PROPERTY

The term property, for purposes of this section, means tangible assets, including information technology systems, with a unit acquisition value of \$5,000 or more and a useful life of more than one year. The cost of which is equal to the original purchase price, taxes, shipping and handling and any other costs associated with installation or set-up. This definition does not include "Real Property", which consists of land, structures or appurtenances. Real Property shall not be purchased with WIOA funds.

Acquisition

All property purchased from WIOA funds must receive prior written approval from IWD. A written request shall be sent to IWD. In cases where the purchase involves information technology, IWD, IT Division must be cc'd as well. The request must include a full description of the property, total cost, programs/cost categories to be charged and an explanation as to the benefit that will be derived from the purchase. Approval or denial shall be done by a written response from IWD.

Title

Title to all property shall be retained by IWD. The Recipient is required to take the necessary steps to safeguard the property from loss or damage. Property tags are to be requested from IWD, Financial Management at the time it is received and tags affixed to the property as soon as they are received. In addition, an inventory of property must be maintained that includes:

- a. Property tag number;
- b. Description of the property;
- c. Stock or ID number, including model and manufacturer's serial number, when applicable;
- d. Manufacturer;
- e. Payment date;
- f. Unit acquisition cost;
- g. The cost per program/cost category;
- h. Location of property;
- i. Condition of property; and

A physical inventory of property shall be performed on an annual basis and provided to IWD Financial Management by August 15th of each year.

The Recipient must ensure as a condition of purchasing, that the property will be used for the intent of the program from which it was purchased for as long as needed. When no longer needed for that particular program, the property may be used according to the following priority:

1. Other activities from the federal agency that originally paid for the property; then

2. Other activities from other federal agency funds;

The Recipient may use property for other federal program purposes, so long as that does not interfere with the usage necessary for the program from which it was purchased. First preference must be given to other programs or projects supported by the federal agency which paid for the property. Second preference would go to other federal programs administered by the Recipient.

REPORTING REQUIREMENTS

This section identifies what reports are required of the Recipient for financial and program compliance with the WIOA programs. Each reporting element must be tracked and traceable to the books of account held by each Recipient, unless otherwise specified in this section.

Financial Status Reports (FSR)

A monthly FSR is due by the 20th of the following month and a final report is due 45 days after the end of each State Fiscal Year or completion of the terms of the individual agreement, which occurs first. Not all Recipients receive funds from each of the three major programs and therefore, some of what is described below, may not apply to a given Recipient. The FSR will include the following programs and categories that must be traceable to the books of account (unless otherwise specified):

Administration

- a. The current month and cumulative total expenditures of the combined Adult, Youth and Dislocated Worker funds expended by the Recipient; and
- b. The total amount available for administration according to the agreement with IWD;
- c. Both a and b above must be reported according to the Program Year (PY) or Federal Year (FY) distributed to the Recipient and appearing in the contract agreement; and
- d. Funds must be FIFO'd (First in, First out) on the books of account and FSR with the oldest funds expended first.

Adult and the Dislocated Worker Programs Funds (reported separately)

- a. The current month and cumulative expenditures for Transitional Jobs training;
- b. The current month and cumulative expenditures for Incumbent Worker training;
- c. The current month and cumulative expenditures for Pay-for-Performance contracting;
- d. The current month and cumulative total expenditures for all other costs incurred against the program funds;
- e. The total amount available for Programs according to the agreement with IWD;
- f. The Recipient will report a-d according to the PY vs. FY distributions appearing in the contract agreement; and
- g. FIFO funds on the books of account and the FSR.

Youth Program Funds

- a. Current month and cumulative expenditures for In-School Youth (ISY), Work Experience expenditures;
- b. Current month and cumulative expenditures for all other ISY expenditures;
- c. Total current month and cumulative ISY expenditures;
- d. Total amount available for ISY according to the agreement between IWD and the Recipient;
- e. Current month and cumulative expenditures for Out-of-School (OSY), Work Experience expenditures;
- f. Current month and cumulative expenditures for all OSY expenditures;
- g. Total current month and cumulative OSY expenditures;
- h. Total amount available for OSY according to the agreement with IWD;
- i. The Recipient will report all costs according to the appropriate PY allocation; and
- j. FIFO funds on the FSR only (not required on the books of account).

Revenue will be reported on each FSR as well. Revenue is reported by program and PY vs. FY. At a minimum, you will have Administration, Adult, Youth and Dislocated Worker revenue to report and possibly multiple PY and FY years of funding. Revenue must be the actual cash basis revenue received by the end of each month.

Drawdowns

Weekly drawdowns must include the following revenue breakdown by PY vs. FY:

- a. Administration;
- b. Adult Program;
- c. Youth Program; and
- d. Dislocated Worker Program;

In addition, the drawdown report will include the Recipient name, week of the request, IWD unit code, IWD sub-unit code, IWD fund, IWD object class, IWD program code and description.

IWD reserves the right to request other financial reports or financial data on an as needed basis.

Program Reports

RESERVED

UNALLOWABLE COSTS

The Uniform Guide, 2 CFR Part 200, identifies costs that may not be charged against any federal award. In addition, there are costs that IWD does not allow to be charged to any WIOA programs. A cost must be reasonable and proper for the efficient administration of the WIOA programs. The term "reasonable" is defined in the Administrative/Financial Requirement section of the WIOA Handbook. In addition, any costs charged to the programs must be allocable and not a general expenditure of the overall responsibilities of the Recipient receiving the funds.

If IWD determines that the Recipient has charged any WIOA programs with an expense that IWD determines to be unallowable to that particular program or cost category, the Recipient will be notified and be responsible for the repayment or offset of that expenditure. Repayment vs. offset will be determined on a case by case basis and consistent with the WIOA regulations, WIOA Handbook, Uniform Guide and the terms and conditions of the agreement between IWD and the Recipient.

Unallowable costs shall include:

- a. Any portion of salary for an individual that is calculated against a base that is in excess of the Executive Level II pay of the federal government;
- b. Fringe benefits that do not comply with the rule that they must be reasonable, required by law, non-federal entity-employer agreement, or an established policy of the Recipient;
- c. Fringe benefits that are not equitably allocated to all related activities, including the federal awards;
- d. Funds paid to a contingency reserve for events the occurrence of which cannot be foretold with certainty as to the time or intensity, or with an assurance of their happening (excluding certain fringe benefits identified in section 200.431 of the Uniform Guide);
- e. Costs of contributions and donations, including cash, property and services;
- f. Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements that meet the criteria identified in section 200.435 of the Uniform Guide;
- g. Depreciation for any asset that has outlived its useful life;
- h. Costs of entertainment, including amusement, diversion and social activities and any associated costs (except where specified in a federal award);
- i. Equipment purchases of \$5,000 or more that did not receive prior written approval from IWD;
- j. Costs resulting from violations of, alleged violations of, or failure to comply with, federal, state or local laws and regulations (except if incurred as a result of compliance with specific provisions of the federal award);
- k. Fund raising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred to raise capital or obtain contributions (unless prior written approval from IWD and the federal awarding agency);

- l. The general costs of government including chief executive of a local government, local government body, such as county supervisors, city council, school boards, general types of services such as fire and police;
- m. Costs of goods or services for personal use of employees;
- n. The cost of idle facilities as defined in section 200.446 of the Uniform Guide;
- o. Costs of insurance or contributions to a reserve covering the risk of loss or damage unless specifically identified in the federal award;
- p. Costs of insurance of the lives of any individual where the Recipient is identified as the beneficiary;
- q. Actual losses which could have been covered by permissible insurance, excluding minor deductibles which may apply;
- r. Lobbying activities;
- s. Costs in excess of the amounts budgeted by program and cost category, with the exception that administrative funds may be used for programmatic activity;
- t. Costs of memberships to country clubs or social or dining club organizations as well as organizations whose primary purpose is lobbying;
- u. Costs of incorporation, broker's fees, fees to promoters, organizers or management consultants, attorneys, accountants or investment counselors, whether or not employees of the Recipient, in connection with establishment or reorganization of an organization;
- v. Pre-award costs unless approved by IWD and the federal government;
- w. General costs associated with selling or marketing of any products or services unless specifically allowed in section 200.421 of the Uniform Guide;
- x. Student activity costs for such things as intramural, student publications, student clubs and other student activities;
- y. Foreign travel (including any travel outside the continental United States), is not allowable without the prior written approval of IWD; and
- z. Any other costs that would not be considered reasonable or necessary to administer the programs.

ATTACHMENT "F"

Date: May 5, 2016
To: RWDB Board
Re: Summary of State & Federal Guidance Documents

TEGL #14-15 – Requirements for Unified and Combined State Plans

The vision and content requirements for the Unified and Combined State plans under WIOA and collaboration expectations between partners is described. Partnerships should engage employers and move individuals from adult basic education, to post-secondary education, incorporate industry-recognized credentials, and advance individuals along career pathways.

TEGL #19-15 - ApprenticeshipUSA Funding Announcement: State Accelerator Grants

Accelerator Grants of \$250,000 are available to support a range of activities aimed at integrating Registered Apprenticeships within state systems and policy alignment. The grants are intended to lay the foundation for rapid and sustained expansion of apprenticeship programs. Apprenticeship programs are designed to be a "grow your own" strategy to increase skilled workers in the pipeline. Registered Apprenticeship programs incorporate both on-the-job training as well as classroom style instruction.

TEGL #19-15 - Change 1 to ApprenticeshipUSA Funding Announcement: State Accelerator Grants

Correction of CFDA (Catalog of Federal Domestic Assistance) to #17,285 (previously #17,201) program funding number. A program contact of Cierra Mitchell in the Office of Apprenticeship was added as a resource for grant submissions.

TEGL #21-15 - Fiscal Year (FY) 2016 State Initial Allocations for Trade Adjustment Assistance (TAA) Training and Other Activities and the Process for Requesting TAA Reserve Funds.

The funding formula methodology is described as well as the process to request TAA funds for dislocated workers. Each state will receive an initial allocation based on trends that have been observed in the recent calendar quarters of workers being served. Criteria and processes are also outlined to request TAA program Reserve Funds.

TEN #30-15 - Release and Availability of a Report, "Evaluation of the Jobs and Innovation Accelerator Challenge Grants: Interim Findings on Multiagency Collaboration and Cluster Progress"

The study of the effectiveness of these grants is ongoing and evaluating: 1. Effectiveness of multiagency collaboration, 2. Development of regional clusters, programs, and partnerships, 3. Workforce outcomes, 4. Management practices and sustainability, and 5. Implementation lessons learned. Interim findings in recent focus areas of advanced manufacturing, renewable energy, and IT, show promise.

TEN #33-15 - Announcement of the Launch of WorkforceGPS

WorkforceGPS is an upgraded platform that provides more effective ways to search, save, and share information amongst the workforce system, educational professionals, and business leaders. Key features include: a consistent look and feel, an improved search engine, and access across all devices.

TEN #35-15 – Encouraging Collaborations between the Workforce Investment System and Public Libraries to Meet Career and Employment Needs

Public libraries have been identified as optional partners in American Job Centers, particularly in the area of finding workforce and labor information and assistance searching for jobs. These collaborative efforts would increase the quality and quantity of access points for individuals needing career information and assistance. In addition to public computers and internet access, libraries could provide space for career fairs and networking events.

ATTACHMENT "G"

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| EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210 | CLASSIFICATION WIOA State Planning |
| | CORRESPONDENCE SYMBOL OWI |
| | DATE March 4, 2016 |

**ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER WIOA NO: 14-15
OPERATING GUIDANCE for the WORKFORCE INNOVATION AND
OPPORTUNITY ACT (WIOA or Opportunity Act)**

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE ADMINISTRATORS
STATE WORKFORCE LIAISONS
STATE AND LOCAL WORKFORCE BOARD CHAIRS AND DIRECTORS
STATE LABOR COMMISSIONERS
STATE LMI DIRECTORS
SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM GRANTEEES
STATE APPRENTICESHIP AGENCIES
STATE DIRECTORS OF THE OFFICE OF APPRENTICESHIP
STATE DIRECTORS FOR VETERANS' EMPLOYMENT AND TRAINING
STATE UNEMPLOYMENT INSURANCE DIRECTORS
STATE WORKFORCE AGENCY VETERANS COORDINATORS

FROM: PORTIA WU /s/
Assistant Secretary

SUBJECT: Workforce Innovation and Opportunity Act (WIOA) Requirements for Unified
and Combined State Plans

1. Purpose. This Training and Employment Guidance Letter (TEGL) conveys the following to States:

- The vision and content requirements for Unified and Combined State Plans under WIOA;
- The deadline and submission process for Unified and Combined State Plans under WIOA (Section 11);
- The requirements to have approved Unified or Combined State Plans in place for Program Year (PY) 2016 and beyond for the six core programs of WIOA; and
- The options for States to incorporate all or portions of partner programs into their State plan submissions if they choose to submit a Combined State Plan.

This guidance—developed jointly by the Departments of Labor (DOL), Education (ED), Health and Human Services (HHS), Agriculture (USDA), and Housing and Urban Development (HUD) (Departments) — provides an overview of the Administration's priorities in relation to the WIOA planning requirements, explains the planning requirements where necessary, and instructs States regarding submission procedures. Each of these Departments will issue similar guidance separately. This guidance also provides the

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| RESCISSIONS TEGL 21-11 | EXPIRATION DATE Continuing |
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deadlines for the Unified or Combined State Plan, depending on which option the State chooses to submit, as well as modification requirements. The Departments recognize that States have been engaged in the planning process for the initial Unified or Combined State Plan for some time and commend States for their efforts while awaiting finalization of the requirements and guidance from the Departments.

For the initial four-year Unified and Combined State Plans, States must submit their Unified or Combined State Plans to the Departments by March 3, 2016; however, Plans submitted by April 1, 2016 will be considered timely. States should submit the Plans via the online portal described in Section 11.

WIOA became law on July 22, 2014 and supersedes titles I and II of the Workforce Investment Act (WIA) of 1998, and amends the Wagner-Peyser Act and the Rehabilitation Act of 1973. The Departments of Labor and Education published a set of proposed regulations for implementing WIOA through the posting of five Notice of Proposed Rulemaking (NPRMs) documents. These NPRMs were open for public comment until June 15, 2015, and the Federal agencies are reviewing, analyzing and considering all the comments received. The final WIOA rules will be issued in 2016.

To continue implementation prior to issuance of the final rules, a series of WIOA Operating Guidance documents are being issued which inform the workforce system of the important planning and organizational work necessary to comply with the WIOA statutory requirements. The Operating Guidance TEGLs provide a framework for program activities until the publication of the final rules, and this TEGL is one in a series of the WIOA Operating Guidance.

2. **References.** See Attachment I.
3. **Background.** WIOA requires the Governor of each State to submit a Unified or Combined State Plan to the Secretary of Labor that includes a four-year strategy for the State's workforce development system. States must have Federally-approved State Plans to receive funding for the six core programs. At a minimum, States must submit a Unified State Plan, which encompasses the six core programs under WIOA. States have the option to submit a Combined State Plan, which includes the six core programs of the Unified State Plan, plus one or more other partner programs, described at Section 4 of this TEGL. For purposes of the Unified or Combined State Plans, the term "State" refers to the 50 States, the District of Columbia, Puerto Rico, American Samoa, Guam, the U.S. Virgin Islands, the Northern Mariana Islands, and, as appropriate for certain programs, the Republic of Palau.
4. **Unified and Combined State Plan Options.** A State has two options for submitting a WIOA State Plan—a Unified State Plan or a Combined State Plan. Section 102(a) of WIOA requires each State, at a minimum, to submit a Unified State Plan that fosters strategic alignment of the core programs, which are:

- the Adult program (Title I),
- the Dislocated Worker program (Title I),
- the Youth program (Title I),
- the Adult Education and Family Literacy Act program (Adult Education or AEFLA) (Title II),
- the Wagner-Peyser Act program (Wagner-Peyser Act, as amended by Title III), and
- the Vocational Rehabilitation (VR) program (Title I of the Rehabilitation Act of 1973, as amended by Title IV).

In addition, WIOA permits a State to submit a Combined State Plan including the aforementioned core programs plus one or more of the Combined State Plan partner programs listed in section 103(a)(2). States choosing to submit a Combined State Plan must incorporate 1) all of the common planning elements required in the Unified State Plan; 2) additional elements describing how the State will coordinate the optional programs with the core programs; and 3) additional elements required by the Combined State Plan partner program(s) that are included (WIOA sec. 103(b)(3)).

More specifically, when a State includes a Combined State Plan partner program in its Combined State Plan, the State need not submit a separate plan or application for that particular program, with certain exceptions identified in section 9 of this guidance. If included in the plan as a partner, Combined State Plan programs are subject to the “common planning elements” (Sections II-IV of the State Plan Requirements in the Unified and Combined State Plan Information Collection Request (ICR) discussed in section 5) and program-specific requirements for that program when such planning requirements exist separately for the program outside of WIOA. The Combined State Plan partner programs are—

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.);
- Temporary Assistance for Needy Families program (42 U.S.C. 601 et seq.);
- Employment and training programs under the Supplemental Nutrition Assistance Program (programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)));
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o));
- Trade Adjustment Assistance for Workers programs (Activities authorized under chapter 2 of Title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.));
- Jobs for Veterans State Grants program (programs authorized under 38 U.S.C. 4100 et. seq.);
- Unemployment Insurance (UI) programs (UI Federal-State programs administered under State unemployment compensation laws in accordance with applicable Federal law);
- Senior Community Service Employment Program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.));
- Employment and training activities carried out by HUD;

- Community Services Block Grant (CSBG) (employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)¹; and
- Reintegration of Ex-Offenders program (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532)).

5. **Planning Requirements.** States must use the ICR *Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements* published under Office of Management and Budget (OMB) control number 1205-0522 to develop and submit the WIOA Unified or Combined State Plan and in accordance with instructions described in Section 11. A copy of the ICR, which complies with statutory requirements set forth in, as appropriate, sections 102 and 103 of WIOA, is available at https://www.doleta.gov/wioa/State_Plan_Resources.cfm. A copy of these requirements is also available through the web-based platform, discussed in Section 11 of this guidance, developed specifically for the required electronic submission².

6. **Purpose and Summary of the State Plan.** Under WIOA, the Unified and Combined State Plans communicate the State's vision for the State workforce system and serve as a vehicle for aligning and integrating this system across Federal programs. Previously governed by WIA, WIOA improves planning requirements to foster better alignment of Federal investments in job training and education, to integrate service delivery across programs, to improve efficiency in service delivery, and to ensure that the workforce system is job-driven and matches employers with skilled individuals. Specifically, this reform promotes a shared understanding of the workforce needs within each State; fosters development of more comprehensive and integrated approaches, such as career pathways and sector strategies, for addressing the needs of businesses and workers; and enables the system to provide a wider range of coordinated and streamlined services to their shared customers. WIOA requires States to plan across core programs and include this planning process in the Unified or Combined State Plans. Economic, education, and workforce partners at the State, regional, and local level should be engaged in this planning process with the goal of improving the workforce development system.

State Plans should reflect strategies that advance these key WIOA principles:

- Increase access to and opportunities for the employment, education, training, and support services that individuals, particularly those with barriers to employment, need to succeed in the labor market;

¹ States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried out by the Department of Housing and Urban Development that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

² The Office of Management and Budget (OMB) has approved the Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements under OMB Control Number 1205-0522 in accordance with the Paperwork Reduction Act.

- Align workforce investment, education, and economic development systems in support of a comprehensive, accessible, accountable, and high-quality workforce development system;
- Improve the quality and labor market relevance of workforce investment, education, and economic development efforts;
- Promote improvement in the structure and delivery of services;
- Increase the prosperity of workers and employers, the economic growth of communities, regions and States, and the global competitiveness of the United States;
- Provide innovative workforce investment activities, through integrated workforce development systems, that increase employment, retention, and earnings of participants and that increase postsecondary credential attainment and, as a result, improve the quality of the workforce, reduce welfare dependency, increase economic self-sufficiency, meet skill requirements of employers, and enhance productivity and competitiveness of the nation; and
- Measure effectiveness, improve transparency, and support informed consumer choice through performance reporting, evaluation, and data systems that support these activities.

7. **Plan Structure.** The Departments envision that this plan will describe how the State will develop and implement a unified, integrated workforce system, rather than a plan that separately discusses the State's approach to operating each program individually. The major content areas of the Unified or Combined State Plan include strategic and operational planning elements. WIOA separates the strategic and operational elements to facilitate cross-program strategic planning. The Strategic Planning and Operational Planning Elements are the "common elements" of the plan. They should incorporate all of the core programs, any Combined State Plan partner programs that are included and required one-stop partners. This new approach enables States to involve different levels of the workforce system in developing the appropriate sections of the plan. For example, the State Workforce Development Board may focus on developing the State vision or setting strategic direction in the Strategic Plan section, while the State agency may focus on the Operational Plan.

The **Strategic Planning Elements** of the Unified or Combined State Plan must include an analysis of the State's current economic environment and identification of the State's overall vision for its workforce development system, including analyses of the State's workforce characteristics and workforce development activities. These analyses drive the required vision and goals for the State's workforce development system and alignment strategies for workforce development programs to support economic growth. For Combined State Plans, the Strategic Planning Elements apply to Combined State Plan partner programs included in the plan as well as to all of the core programs.

The **Operational Planning Elements** section identifies the State's planned actions to implement and support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. The State Operational

Plan must elaborate on the Strategic Plan section relating to the State's plans and resources for an aligned and integrated workforce system by discussing how the programs included in the State Plan will serve various individual participants. For instance, the State Operational Plan should discuss how services for employers and various job seekers will be delivered. Similarly, the State Plan must also describe the State's plans to align data systems and support evaluations. The structure of the Operational Planning Elements in the law and ICR is:

- State Strategy Implementation;
- State Operating Systems and Policies;
- Common Assurances;
- Program-Specific Requirements for the Core Programs; and
- Program-Specific Requirements for the Combined State Plan partner programs.

8. **Creating High Quality Strategic and Operational Planning Elements.** The Departments encourage States to include the following factors in the development and ongoing process of planning over time for the common elements of the State Plan.

- a. Strategic and Operational Planning Elements should incorporate WIOA's key principles (noted above), as well as the Departments' current policy priorities. In particular, the strategic and operational planning elements should align with the Departments' shared Vision for the Workforce System, as described in TEGL 19-14, and the Departments' shared Vision for the One-Stop Career Center System, as described in TEGL 04-15. States should also review program specific TEGs, available at www.doleta.gov/wioa, to include program priorities as a part of state planning where appropriate.
- b. Workforce programs operate within the context of a regional labor market. States must use reliable labor market information and workforce information as the basis for the development of policies, strategic investments, program design, and service delivery, in order to ensure that customers have high quality information available to inform their decisions. The State Plan must include a description of the labor market and economic conditions in the state to identify critical industries, including population and workforce trends, and describe the economic challenges facing the State that need to be addressed to meet the needs of businesses, workers, and job seekers. Strategies and program decisions at the State and local levels should be based on, connected to, and aligned with the labor market trends and economic analysis. The professional analysis of available data should result in labor market relevant goals, strategies and planned outcomes that make an impact on regional labor markets, and that advance the economic prosperity of customers served.
- c. Strategic and Operational Planning Elements should also reflect a robust analysis of the State's current workforce development, education, and training activities, including their opportunities, strengths, and weaknesses; their capacity to serve the

needs of businesses and individuals; their current level of cross-program alignment; and their use of evidence-based practices.

- d. Operational Planning Elements should clearly articulate the specific actions, milestones and activities that the State will undertake to increase program alignment and integration of services, and describe ongoing assessment of those activities, as allowable by law. While not all-inclusive, some important examples of program alignment and integration include:
- i. Partnering across the Adult, Dislocated Worker, Youth, TANF, Adult Education, VR, and other programs to implement comprehensive career pathway approaches that align and bridge training, education, employment, and supportive services at the local and State levels. This partnership should engage employers and enable individuals to move beyond adult basic education and succeed in postsecondary education, earn industry-recognized credentials, and advance along a career path.
 - ii. Partnering across the core programs, economic development, education, and other programs to develop sector strategies and other aligned services geared to serving businesses. Examples include:
 - o outreach and marketing to the business sector;
 - o development of business engagement goals in collaboration with members of the State Board;
 - o training for Business Service Representatives (BSRs), Rapid Response Coordinators and other staff that work directly with businesses;
 - o development of sector partnerships among State, local businesses, professional service organizations, and trade associations including linkages with sponsors of registered apprenticeship programs;
 - o services and resources provided to business, including on-the-job-training (OJT), customized training, incumbent worker training, recruitment, toolkits, data visualization, among others; and
 - o development of standardized metrics of success for business engagement activities such as repeat business, return on investment, and new hires.
 - iii. Improving the connection between the WIOA core programs and UI systems to enhance access to reemployment services for all unemployed job seekers, including UI claimants and transitioning veterans, and enhancing service delivery through integrated service strategies and the creative use of technology.
 - iv. Using Registered Apprenticeships, on-the-job training, and other work-based training strategies to meet the training needs for all job seekers served by One-

Stop Career Centers as well as satisfying employer needs for access to skilled workers and talent pipelines.

- v. Connecting the multiple systems that serve disconnected youth such as partnering with human service agencies to support summer employment and work experiences throughout the year; coordinating with Adult Education to ensure integrated education and training opportunities; working with VR to serve in-school youth as they transition from the secondary education system to postsecondary education, training and employment; developing innovative pre-apprenticeship and youth apprenticeship programs that lead to successful placement in Registered Apprenticeship programs; or improving coordination among existing programs, such as Job Corps and YouthBuild.
- vi. Comprehensively serving dislocated workers impacted by economic displacement. The variety of programs that serve dislocated workers—Rapid Response, TAA, the WIOA Dislocated Worker program, and UI and Reemployment Assistance Services—should be strategically coordinated to maximize efficient use of funds and to provide the most comprehensive supports and services available to impacted workers. This can include integrating data systems, streamlining case management and assessment, and ensuring needed job search or training services are provided.
- vii. Connecting the multiple systems that address the specific needs of individuals with barriers to employment (as defined in WIOA sec. 3(24)), such as individuals with disabilities or English language learners, and articulating how programs will collaborate to provide the following:
 - o conducting outreach activities to individuals with barriers to employment;
 - o conducting training activities for One-Stop Career Center and partner staff on how to work with these populations and the available community-based resources and Federal resources such as the toolkit available at <https://doors.workforce3one.org/page/resources>;
 - o partnering with agencies and organizations serving specific populations;
 - o collaborating with the business sector to make the business case for hiring populations with barriers;
 - o implementing strategies to increase access to on-the-job-training, mentoring, Registered Apprenticeship, internship and job-shadowing opportunities;
 - o providing educational and training services that lead to career pathways opportunities and the development of talent pipelines;
 - o implementing plans to improve securing a job, retaining employment, and return-to-work strategies for job seekers who are disconnected from the workforce; and

- o implementing designs to create a universally accessible, welcoming, user-and customer-friendly environment for the delivery of employment services, including remote services to rural areas. For examples of strategies to achieve universal accessibility see Training and Employment Notice 1-15 available at: https://wdr.doleta.gov/directives/attach/TEN/TEN_01-15.pdf.

9. **Special Considerations for Combined State Plan Partner Programs.** The information collections for the program-specific portion of the State plans for the Combined State Plan partner programs will continue to exist under existing state planning ICRs for those programs, as governed by those programs' authorizing legislation. Once a Combined State Plan is approved, the State is not required to submit any other State plan to receive federal funding for any optional program covered under that Combined State Plan, with some exceptions described below.

Note that some of the other programs that a State may include in the Combined State Plan currently fulfill their program-specific State planning requirements through a separate information collection administered by the program's appropriate Department. For example, section 103(b)(2) of WIOA (referring to sec. 103(a)(2)(J) and (K)) specifically allows the employment and training *activities*—rather than the full program—carried out under the CSBG Act administered by HHS and employment and training activities funded by HUD to be included in a WIOA Combined State Plan. Therefore, if States choose to include programs such as these in the Combined State Plan, only the portion of the existing planning requirements that address the employment and training *activities* should be included in the Combined State Plan. States still must submit all other required elements of a complete State Plan for those programs directly to the relevant Departments.

Portions of the Combined State Plan covering a program or activity, excluding those related to the core programs, are subject to approval by the head of the Federal agency that administers such program (WIOA sec. 103(d)(2)). The portions of the Combined State Plan related to the core programs are subject to the same approval requirements applicable to the Unified State Plan (WIOA sec. 102(c)).

States that include UI in their Combined State Plan, carried out under Title III, Section 302, of the Social Security Act, including Sections 303(a)(8) and (9) which govern the expenditure of funds, should submit their UI State Quality Service Plan (SQSP) following the cycle as outlined in the current Employment & Training Handbook No. 336, UI SQSP Planning and Reporting Guidelines.

The Jobs for Veterans State Grant (JVSG) programs, carried out under chapter 41 of title 38 of the U.S. Code, require both a JVSG State Plan and a separate annual application for funding. States that include the JVSG programs in their Combined State Plan would submit the JVSG State Plan information in their Combined State Plan, and would submit their funding applications annually, as required by current VETS guidance.

For Combined State Plans, the common elements of the State Plan, those portions covering the core programs, and programs administered by the DOL or ED, will be considered approved 90 days after receipt unless either Secretary informs the State in writing, during the 90-day period, that the plan is inconsistent with WIOA's State Plan requirements or the requirements authorizing the core program, as appropriate. Those portions of the plan covering programs administered by HUD, USDA and HHS must be approved or disapproved within 120 days of receipt, by those Departments. For the six core programs, decisions regarding approval or disapproval and funding status may be determined separately from the determination of approval, disapproval, or completeness of the program-specific requirements of Combined State Plan partner programs and activities described in the Combined State Plan. For example, if all the common planning elements and program-specific requirements for the core programs are met, approval and funding may proceed regardless of specific issues that may be identified in the program-specific sections for any Combined State Plan partner programs.

- 10. Stakeholder Collaboration and Comment is Key.** Stakeholder collaboration, review and comment are key requirements of the planning process. State Workforce Development Boards are responsible for overseeing the development, implementation, and modification of the plan and for convening all relevant programs, required partners, and stakeholders. The State Plan must be developed with the assistance of the State Board, as required by sec. 101(d) of WIOA, and must be developed in coordination with administrators that have optimum policymaking authority for the core programs and required One-Stop partners. For Combined State Plans, entities responsible for planning or administering other programs included in the plan also must have an opportunity for review and comment.

Effective joint planning is fundamental to both Unified and Combined State Plans. Whether the State chooses to submit a Unified State Plan or a Combined State Plan, the State must develop the State Plan through joint planning and coordination across core programs and with required One-Stop partner programs and other programs and activities in the State Plan. Prior to submitting the Unified or Combined State Plan, the State agencies responsible for the administration of the core programs must have reviewed and commented on the appropriate operational planning portion of the State Plan and approved the elements as meeting the needs of the population served by such programs (see WIOA sec. 102(b)(2)(E)(iii)(I)).

States must provide the opportunity for public comment, which allows interested stakeholders to participate actively, effectively, and transparently in the development of the plan. The Governor must ensure that the State Plan is developed with an opportunity for public comment and input from representatives of Local Boards and chief elected officials; businesses; labor organizations; economic development entities; community-based organizations; adult and youth education and workforce development providers; institutions of higher education; disability service entities; youth-serving programs; veterans' service organizations; foster care, juvenile justice and other stakeholders with an interest in the services provided by the six core programs; any optional program included in a Combined State Plan; and the general public, including individuals with disabilities. See WIOA sec.

102(b)(2)(E)(iii)(II). Programs included in the Combined State Plan may require consultation with other specific individuals or groups. The State Board also must make information regarding the State planning process publicly available by holding regular open meetings (WIOA sec. 101(g)).

11. Instructions for Plan Submission. For the initial four-year Unified and Combined State Plans (covering the period July 1, 2016-June 30, 2020), States must submit their Unified or Combined State Plans to the Departments by March 3, 2016; however, Plans submitted by April 1, 2016, will be considered timely.³ States must submit the Plans via the online portal hosted by the Rehabilitation Services Administration (RSA), which allows the entire State Plan to be made available concurrently to DOL and ED, as well as other Departments if their programs are included. The submission portal is available along with other State Plan resources at <https://rsa.ed.gov/login.cfm?mode=form&usp=Y#skipnav>. Instructions on how to request State user accounts are available on the web link provided on this site. The Departments will deliver training on the portal to State users, and Federal staff will be available to provide basic technical guidance and to authorize individuals from the States to have read-only, and/or edit, access to the State Plan portal, as appropriate.

The portal will permit multiple users within a State to enter portions of the State's plan at the same time, thereby, allowing program partners to enter content that is common to all State plan partners as well as content that is specific to their program directly. In States where there is a separate VR program serving the blind, each VR program must complete a separate VR services portion of the Unified or Combined State Plan. Once State users enter all data and text into the portal, they may review the plan in its entirety, make edits and updates where needed, and view progress in entering plan information across programs. While multiple individuals in the State may enter content into the portal, only one State individual may submit the entire plan on behalf of all included programs through the portal for Federal review. The portal includes a certification that the official State "submitter" has the authority to do so.

States that include the Perkins program as part of their Combined State Plans will submit to the WIOA State Plan portal their currently approved Perkins State Plan, including any revisions the State determines are necessary. The portal will then redirect States from the WIOA State Plan portal via a link to the Perkins State Plan portal. On the Perkins State Plan portal, States will submit: (1) Request to Extend Perkins State Plan; (2) updated budget; and (3) proposed performance levels for the upcoming program year. ED will provide State Career and Technical Education Directors training, passwords, and technical support to upload their information into the WIOA State Plan portal and the Perkins State Plan portal.

States that include Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) as part of their Combined State Plan will submit their SNAP E&T specific State Plans into the WIOA State Plan portal, but must submit component details, participant

³ This extension was announced via a Question and Answer posted at <http://www.doleta.gov/WIOA/FAQs.cfm> on January 21, 2016.

levels, operating budget and fiscal year planned program costs to their Food and Nutrition Service (FNS) Regional Office.

12. **Performance Negotiations for Core Programs.** Separately, DOL and ED will disseminate joint guidance on the WIOA performance negotiation process. For the first Plan, the Departments will work with States during the negotiation process to establish the adjusted levels of performance for each of the primary indicators for the core programs. If necessary, some may be adjusted after the release of the final regulation and Joint Performance ICR. Additionally, DOL and ED acknowledge that for some indicators of certain core programs there is insufficient or no historical data available on which to build the required statistical adjustment model and consequently establish levels of performance using the statistical model as part of the negotiation process. Therefore, DOL and ED will use a “phased-in” approach to set levels of performance for certain indicators for certain programs. The appendix in the Unified and Combined State Plan ICR discussed in Section 5 and in Attachment II of this guidance reflects this approach and displays which indicators/programs DOL and ED have proposed to negotiate for PY 2016. See Attachment II of this guidance for more instructions on establishing performance levels and acceptable baseline indicators.
13. **State Plan Modifications.** Given the multi-year life of the State Plan, States must revisit State Plan strategies regularly, reassess their effectiveness and labor market relevance, and when needed, adjust these strategies to respond to the changing economic conditions and workforce needs of the State. At a minimum, States must submit a modification to the Unified or Combined State Plan at the end of the first two-year period of any four-year plan, and under specific circumstances described in sec. 102(c)(3)(A) of WIOA.

The Departments have determined that for any Combined State Plan program included in the plan with a different planning cycle from WIOA, States should submit program-specific modifications that align with the natural planning cycles for that specific program, unless the 2-year WIOA modification cycle can accommodate that program’s planning and modification cycle. For example, if a State chooses to include Career and Technical Education Programs under the Perkins Act, as a part of its Combined State Plan, the State would submit program-specific plan modifications *annually* to align with the Perkins Act’s annual State plan cycle. Such modifications must be submitted to the relevant Secretary for that program directly, in addition to the DOL and ED via the web portal. As another example, the TANF law requires a State to have submitted a plan within 27 months of the end of the first fiscal quarter in order to receive TANF funds for that fiscal year. Therefore, adopting the more frequent two-year WIOA cycle for modifications should accommodate TANF’s cycle, allowing a State to make all changes to each portion of the Combined State Plan concurrently. In its Combined State Plan, the State may choose to describe in the State Plan the planning cycles of the Combined State Plan programs. In addition, the State may describe intentions to submit future modifications to comply with those planning cycles. HHS intends to publish separate guidance that outlines how a State could align its WIOA and TANF plan renewal cycles.

14. **Special Instructions for Single-Area States.** Item VI(d), in the Title I program-specific State Plan requirements (in the Unified and Combined State Plan ICR discussed in Section 5)

is directed at Single-Area States. It requires them to “submit any information required in the local plan” with the submission of its State Plan. DOL is exercising its transition authority provided in WIOA sec. 503 to delay the requirement that Single-Area States include a local plan with their initial four-year State Plan submission until DOL provides guidance to those specific States.

15. Action Requested. In accordance with the Information Collection Request, *Workforce Innovation and Opportunity Act (WIOA) Unified and Combined State Plan Requirements*, States must submit a WIOA Unified or Combined State Plan to the Departments on March 3, 2016, but no later than April 1, 2016, using the web portal described in Section 11 of this guidance.

16. Resources and Tools.

- WIOA Related Guidance, https://wdr.doleta.gov/directives/All_WIOA_Related_Advisories.cfm
- WIOA Fact Sheets, <https://www.doleta.gov/WIOA/FactSheet.cfm#>
- Resources and Tools for Workforce Professionals, <https://www.doleta.gov/usworkforce/>
- Guide to State and Local Workforce Data, Third Edition, <https://winwin.workforce3one.org/view/2001212365477234753/info>
- Section 188 Disability Reference Guide, https://wdr.doleta.gov/directives/attach/TEN/TEN_01-15.pdf
- State Plan Resources https://www.doleta.gov/wioa/State_Plan_Resources.cfm

17. Inquiries. Direct inquiries to the relevant Employment and Training Administration Regional Office.

18. Attachments.

- Attachment I — References
- Attachment II — Appendix I for State Plan ICR

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|---|---|
| EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210 | CLASSIFICATION ApprenticeshipUSA/Registered Apprenticeship |
| | CORRESPONDENCE SYMBOL OA |
| | DATE April 21, 2016 |

**ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 19-15
APPRENTICESHIPUSA STATE ACCELERATOR GRANTS FUNDING
ANNOUNCEMENT**

TO: STATE GOVERNORS
STATE APPRENTICESHIP AGENCIES
STATE WORKFORCE AGENCIES
STATE WORKFORCE ADMINISTRATORS
STATE WORKFORCE LIAISONS
STATE AND LOCAL WORKFORCE BOARD CHAIRS AND DIRECTORS
STATE EDUCATION AGENCIES
STATE ECONOMIC DEVELOPMENT AGENCIES

FROM: PORTIA WU /s/
Assistant Secretary

SUBJECT: ApprenticeshipUSA Funding Announcement: State Accelerator Grants

- Purpose.** Building on historic bipartisan support from Congress and leadership across a broad range of States, the United States Department of Labor (DOL) is announcing \$90 million available this year through the ApprenticeshipUSA initiative. ApprenticeshipUSA is a national campaign bringing together a broad range of stakeholders, including employers, labor, States, education and workforce partners, to expand and diversify Registered Apprenticeship in the United States. Through this TEGL and a forthcoming Funding Opportunity Announcement DOL will invest a total of \$61.5 million in State-led strategies to grow and diversify apprenticeship. The remaining funds will be used to invest in national intermediaries and activities to engage employers, expand and diversify Registered Apprenticeship to new sectors and under-served populations, and promote innovation and excellence in this critical earn and learn strategy. For more information on ApprenticeshipUSA investments, please see www.dol.gov/apprenticeship.

This Training and Employment Guidance Letter (TEGL) announces the availability of up to \$9.5 million for ApprenticeshipUSA State Accelerator Grants (Accelerator Grants) of up to \$250,000 per State (for purposes of this TEGL, State has the same definition as it does in 29 C.F.R. § 29.2.). The Accelerator Grants will support Governors and their States to catalyze or build upon existing strategies to expand and diversify Registered Apprenticeship opportunities. These strategies include convening key industry representatives, State agency leaders and other stakeholders to form strategic partnerships, and elevate apprenticeship as a workforce solution in both traditional and non-traditional industries including IT, healthcare, advanced manufacturing, cyber-security, business services, transportation, and others.

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|----------------------------|--------------------------------------|
| RESCISSIONS None | EXPIRATION DATE Continuing |
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Accelerator Grants are structured to support a range of State activities aimed at integrating Registered Apprenticeship within State talent development systems through partnerships and policy alignment across the workforce, secondary and post-secondary education, economic development systems, and beyond. Accelerator Grants will also offer States the opportunity to build their capacity to conduct outreach and work with industry leaders to launch new or expand existing apprenticeships, as well as to identify and capitalize on strategic opportunities for expansion and technical assistance to promote excellence and innovation. For example, sector partnerships and the development of career pathways may connect a range of students, jobseekers, and underrepresented populations to careers in high-demand fields utilizing quality Registered Apprenticeships.

Governors and States are uniquely positioned to develop and implement innovative strategies that use Registered Apprenticeship—a proven earn and learn model—to connect industries seeking talent with the skilled workforce they need. For example, over the past two years, 14 States have grown apprenticeships by more than 20% (see <https://www.whitehouse.gov/blog/2015/09/10/expanding-apprenticeships-invest-american-workers>). Accelerator Grants require States to commit to develop or advance sustainable plans for apprenticeship expansion and leverage existing education and training resources to support apprenticeship. As an Accelerator Grantee, States will have the opportunity to engage with peers in a series of high-profile national ApprenticeshipUSA activities and learning events.

By supporting new and strengthening existing State strategies to grow apprenticeship opportunities, the Accelerator Grants will help lay the foundation for rapid and sustained expansion and diversification of quality apprenticeship nationwide. Over the course of the next few months, DOL will release additional funding opportunities for States, as well as national partners. These funding opportunities will build upon this initial investment and the envisioned success of the State Accelerator grantees over the next few years.

- 2. Background.** Registered Apprenticeships are work-based learning and post-secondary earn-and learn models that meet national standards for registration with DOL, or with a DOL-recognized State Apprenticeship Agency (SAA). As our economy continues to grow, Registered Apprenticeships are playing an increasingly important role with international and American businesses across all industries by providing a pipeline of skilled workers to help them remain competitive. Many employers are increasing their use of Registered Apprenticeships as a “grow your own” strategy to increase and diversify their pipeline of skilled workers.

This proven workforce strategy offers apprentices opportunities to earn a salary while they learn the skills employers demand in a variety of occupations. Apprenticeships are available in a range of industries and occupations including Computer Numerical Control Operator (CNCO) in Advanced Manufacturing, nursing assistant in the Healthcare industry, electrician in the building trades, or coder in Information Technology. The average starting salary for an apprenticeship graduate is over \$50,000 a year. Apprenticeship graduates also earn over the

course of their careers \$300,000 more on average in wages and benefits than their peers who do not participate in a Registered Apprenticeship.¹

The President issued a bold challenge in 2014 to double the number of and further diversify Registered Apprentices within 5 years. Currently, there are approximately 450,000 Registered Apprentices in the United States, which represents a relatively small portion of the labor force compared to other industrialized nations. To put this number in a global context, the United States would need more than six times as many new apprentices as Great Britain, to have a similar per capita ratio. In another comparison, there are over 19 million students in 2- and 4-year American colleges and universities. Underutilization of the apprenticeship model has resulted from a lack of funding, capacity, promotion, and technical assistance, particularly at the State level, and represents a significant lost opportunity to efficiently train American workers with 21st century skills and create stronger State economies.

Additionally, there continue to growing the overall number of apprenticeship opportunities, there is increased attention on further diversifying Registered Apprenticeships. DOL, in coordination with Registered Apprenticeship sponsors and other key stakeholders, continues to advance this key policy goal but more work must be done and greater progress must be made. To illustrate this point, “in 2012, only 6% of active apprentices in the United States were women, up slightly from 5 % in 2008”.² Statistics also show that additional efforts are needed to increase opportunities for communities of color, youth, persons with disabilities, veterans, and Native Americans, among others. As employers recruit and hire from a diverse set of potential employees, they increase opportunities to become more innovative and adaptable to ever changing market conditions.

Registered Apprenticeship programs are authorized through the National Apprenticeship Act of 1937 (29 U.S.C. 50, et seq.). All Registered Apprenticeship programs consist of five core components – direct business involvement, on-the-job training, related instruction, rewards for skill gains, and a national occupational credential.

- **Business Involvement (Employer Driven).** Employers are the foundation of every Registered Apprenticeship program, and the skills needed for workforce success form the core of the model. Businesses must play an active role in building Registered Apprenticeship programs and are involved in every step of their design and execution. Intermediaries, primarily unions, industry associations, colleges, and workforce partners often play a key leadership role in bringing businesses together in support of Registered Apprenticeship programs.
- **On-the-Job Training.** Every Registered Apprenticeship program includes structured On-the-Job Training (OJT, also commonly referred to as On-the-Job Learning). Apprentices receive hands-on training from an experienced mentor for at least one year. This training is developed by mapping the skills and knowledge the apprentice must learn over the course of the program to be fully proficient at the job.

1 An Effectiveness Assessment and Cost-Benefit Analysis of Registered Apprenticeship in 10 States. 2012.

http://www.mathematica-mpr.com/~media/publications/PDFs/labor/registered_apprenticeship_10states.pdf

2 Center for American Progress. Training for Success: A Policy to Expand Apprenticeships in the United States.

<https://www.americanprogress.org/issues/labor/report/2013/12/02/79991/training-for-success-a-policy-to-expand-apprenticeships-in-the-united-states/>

- **Related Instruction.** Apprentices receive related instruction or classroom style training that complements their OJT. This instruction delivers the technical and academic components that apply to their profession. Related instruction may be provided by a community college, technical school or college, a joint apprenticeship training program, or by the business itself. This instruction can be provided at the school, online, or at the job site.
- **Rewards for Skill Gains.** Apprentices receive increases in pay as their skills and knowledge increase. Progressive wage gains reward and motivate apprentices as they advance through training and become more productive and skilled at their jobs.
- **National Occupational Credential.** Every graduate of a Registered Apprenticeship program receives a nationally-recognized credential, referred to as a Certificate of Completion, which is issued by DOL or a federally-recognized SAA. This portable credential signifies that the apprentice is fully qualified for the occupation he or she has trained in. Many Registered Apprenticeship programs – particularly in high demand industries such as health care, advanced manufacturing, and transportation – also offer interim credentials and/or integrate other industry credentials into the curriculum.

For more information, please visit our homepage: <http://www.dol.gov/apprenticeship>.

3. **Allowable Costs.** Grant costs are governed by the Office of Management and Budget Uniform Guidance and DOL exceptions at 2 CFR parts 200 and 2900, respectively. Grants can cover expenses necessary to carry out the programmatic requirements described in section 4 of this TEGL, and other State planning and implementation actions that include or are related to any of the following apprenticeship development activities:

Staff, Contractor, and Subject Matter Expert Support - Grant funds may be used to offset the cost of staffing, contractor, or subject matter experts that support the development and implementation of a state apprenticeship strategy and partner engagement activities:

- a. **Staffing** – States may use grant funds for full or part time staff or contractors to coordinate planning and implementation across multiple systems and agencies. Strong consideration should be given to expanding the capacity of the SAA, where applicable.
- b. **Subject Matter Expert Support** – Grant funds may be used to contract with subject matter experts such as apprenticeship and industry specialists, process re-engineers to streamline program development and registration processes, diversity and inclusion practitioners, information technology experts to update apprenticeship information systems, etc. Funds may be used to develop plans in each of these areas that can be executed upon successful securing of implementation or other funds.
- c. **Facilitation** – States may use funds for assistance with facilitation and guidance for convening with industry, a cross-agency leadership team, and other key partners at the statewide level.

Outreach and Technical Assistance – States may use grant funds for services to develop a professional outreach plan to build employer demand for Registered Apprenticeship, and

technical assistance strategies to assist individual employers to develop new programs and improve program quality. Funds may also be used to support strategies for increasing Registered Apprenticeship opportunities for women, communities of color, youth, persons with disabilities, veterans, and Native Americans, among others. Lastly, funds may be used for engaging parents, educators, other critical stakeholders, and State residents in the vision and generating further support for apprenticeships across the State.

Analysis & Asset Mapping – Grant funds may be used to fund labor market analysis and asset mapping to help States understand sectoral and talent pipeline opportunities for apprenticeship expansion and diversification. Funds may also be used to develop strategies to integrate other resources (Workforce Investment Opportunity Act (WIOA), Pell, State programs, foundation funds, etc.) that can be leveraged in support of the State’s vision and plan. This analysis, along with partnership engagement, will help States to develop plans for the sustained expansion and diversification of apprenticeship in their State that build on existing resources for education and training and opportunities to better serve under-represented populations.

Publications – States may produce new reports, data tools, or resources that can be published or otherwise distributed publicly to encourage and facilitate the adoption of apprenticeship and opportunities to better serve under-represented populations.

Strategic Partnership Meetings and Associated Travel - Grant funds may be used to offset the cost of in-State travel to planning meetings or industry and partner convenings, or out-of-State travel to learn from States, regions, and other experts and practitioners engaged in apprenticeship reform or innovation efforts. Allowable costs include, but are not limited to:

- i. **State and Regional Industry Round Table Events** – Convening employers, key industry and workforce intermediaries, and other stakeholders within and across multiple sectors throughout the State to identify strategic opportunities for apprenticeship expansion.
- ii. **Peer-to-Peer Exchanges** – Dispatching State delegation(s) to engage in cross-learning with leading States or other experts on apprenticeship expansion and diversification.
- iii. **State Apprenticeship Institutes** – Hosting State leadership forums with the purpose of driving greater alignment of apprenticeship with workforce agencies, employers, community colleges, labor, and other components of the talent development system.
- iv. **Partner Engagement** – Convening a range of potential partners, including secondary and post-secondary partners, workforce, community based organizations, and others, to build awareness of and develop apprenticeship models and strategies.
- v. **ApprenticeshipUSA Training** – Attending a DOL-hosted national convening to include peer-learning and technical assistance sessions to support States in their pursuit of apprenticeship expansion and diversification.
- vi. **Training and Consultation** – Participating in other related training or learning opportunities related to apprenticeship provided by other key stakeholders including those held by other States (e.g., Eastern Seaboard

Apprenticeship Conference, Pacific Northwest Apprenticeship Conference), policy organizations (e.g., Urban Institute); or education or workforce organizations (e.g., AACC, NAWB, NGA, NASTAD, and others).

Data Collection – States may use a portion of these funds to enhance data collection capabilities and reporting of individual records (i.e., Registered Apprentices and Program Sponsors) to the Office of Apprenticeship (OA) in a format that is compatible with current and future data collection and reporting platforms. Note: As DOL continues to build a modern IT platform to better manage and report on apprenticeship data, States are strongly encouraged to work with DOL to provide input to customize this platform to meet State needs versus using State Accelerator funds to develop new or substantially modernize state systems. DOL has formed a federal-state workgroup to ensure States' needs and input can be gathered. This option is significantly more cost-effective than investing in new stand-alone systems.

4. **Programmatic Requirements.** Programmatic requirements for all States receiving an ApprenticeshipUSA State Accelerator grant are outlined below. State applicants agree to carry out these requirements throughout the 2-year life of the grant. States receiving a grant will be required to engage in the following programmatic activities and submit the appropriate information to DOL as explained below:

- i. **Provide a Response to the ApprenticeshipUSA Action Planning Tool as described in Attachment I).** State Accelerator grantees are required to submit a response to the criteria contained in Attachment I no later than August 15, 2016. This response will assist each State to consider gaps and opportunities that can be used to develop plans that will expand and diversify apprenticeships in the State.

DOL recognizes that States will be in varying conditions of readiness to expand and diversify apprenticeship. By completing responses to the Action Planning Tool, States will help to shape DOL's technical assistance plans, which will be implemented over the life of the grant. States should also view the Action Planning Tool as a way to guide the development of statewide strategies and plans, including plans which may be proposed in a forthcoming FOA. For those States with more established apprenticeship operations, the tool offers an opportunity to showcase how the State will aggressively pursue broader transformation (e.g., acquiring expertise to scale-up in a new industry or facilitating next steps for State system integration; or recruiting underrepresented populations in Registered Apprenticeship noted earlier in TEG).

- ii. **Apprenticeship Data Collection and Reporting.** States must continue to collect Registered Apprenticeship data elements related to Registered Apprenticeship programs and Registered Apprentices and submit to DOL. Currently many States provide data to DOL on demographics, program sponsors, new programs, and progress of apprentices in aggregate form. To build a more comprehensive picture of Registered Apprenticeship activity across the country, States will be expected to share this data at the individual

record level at quarterly intervals in line with other workforce development programs.

- iii. **State Level Co-Investment and Leveraged Resources in Apprenticeship Innovation.** States must identify existing State, private, and other federal resources that will be leveraged to support expansion and diversification activities articulated in the State Action Planning Tool. States must not supplant existing State funding streams that currently support Registered Apprenticeship.
 - iv. **Participate in ApprenticeshipUSA Training.** States should budget for two individuals to participate in at least one ApprenticeshipUSA State Accelerator grantee technical assistance event hosted by DOL. DOL will convene State teams for a grantee in-person training. This training will focus on supporting State grantees with technical assistance and subject matter expertise while showcasing best practices from peer states for innovating, diversifying, and expanding Registered Apprenticeship.
 - v. **Participate in scheduled conference calls.** Following grant awards, States will participate on an orientation call to discuss program requirements and expected outcomes. Subsequent conference calls will be scheduled to discuss progress.
 - vi. **Submit interim narrative progress and financial reports.** States shall submit interim narrative progress and financial reports that capture grant accomplishments, apprenticeship outreach and communication, engagement activities with employers, industry intermediaries and other key partners, challenges encountered, and solutions. The due date for such reports will be 45 days after the end of each calendar year quarter. Further information will be provided to grantees.
 - vii. **Share state's final plan for apprenticeship innovation, and final narrative and financial reports.** At the conclusion of the grant, participating States will be required to submit a State plan for apprenticeship expansion and diversification as well as a written narrative program report that summarizes accomplishments, apprenticeship outreach and communication, engagement activities with employers, industry intermediaries, inclusion and diversity practitioners, and other key partners, challenges encountered, and lessons learned. The State plan and narrative report may demonstrate progress as measured by short and long-term indicators and outline future plans to sustain the work. DOL will provide additional guidance on the required elements of the final report. Participating States will also be required to submit a final financial report (Form 9130).
5. **Eligible Applicants.** State Governors should identify an appropriate state agency that will be the eligible applicant and submit an application in accordance with the process described in Section 8. Accelerator Grants will be awarded to both federally administered States and federally recognized SAAs in compliance with 29 CFR part 29. For purposes of this TEGL, State has the same definition as it does in 29 C.F.R. § 29.2. Applications

must clearly identify the State entity that will be the grant recipient (e.g., SAA, economic development agency, state workforce agency or state workforce board, or a state community or technical college system). This entity will have the sole responsibility for administering the project. For States with federally recognized SAAs, the SAA should be included as a lead or are required to be a key partner in the implementation of grant activities.

6. **Funds Availability.** The period of performance is 2 years and grant funds will be available for expenditure through May 30, 2018. DOL is making up to \$9.5 million available under this TEGL. States may apply for Accelerator Grants of up to \$250,000. The final amount of each grant is dependent on the number of applicants and cumulative amount of funding requested; however, no grant will exceed \$250,000. If the cumulative funding requested by all applicants exceeds the amount of funds available, all grant awards will be reduced proportionately. If the cumulative funding requested is less than the amount of funds available, each applicant will receive the full amount requested and the balance of funds will be added to the amount available for the forthcoming FOA. See <http://www.dol.gov/apprenticeship> for more information on additional ApprenticeshipUSA investments.

7. **Submission Procedures and Timeline.** In an effort to achieve greater efficiency and as part of ETA's on-going effort to streamline the grant award process, grantees are required to submit the following documents through Grants.gov: 1) an electronically signed copy of a SF-424 - Application for Federal Assistance (OMB Control No. 4040-0004); 2) SF-424A - Budget Information – Non-Construction Programs (OMB Control No. 4040-0006); and 3) a budget narrative to reflect the expenditures included in the SF-424A that demonstrates how Accelerator Grant funds will be used.

An electronically submitted SF-424 through Grants.gov constitutes the official signed document and must reflect the total amount allotted of no more than \$250,000 in item #18, Estimated Funding Item #11 must include the Catalog of Federal Domestic Assistance Number, 17.201. ETA encourages States to apply by April 30, 2016; however, the official closing date for this grant opportunity is May 15, 2016. ETA plans to award the Accelerator Grant funds in late May.

To submit the required documents, States must follow the "Apply for Grants" link on Grants.gov, and download the links for the grant application package. States should **not** follow the "Find Grants" link, as this not a competitive funding opportunity.

If States encounter a problem with Grants.gov and do not find an answer in any of the other resources, call 1-800-518-4726 or 606-545-5035 to speak to a Customer Support Representative or email support@grants.gov. The Contact Center is open 24 hours a day, seven days a week. It is closed on federal holidays.

8. **Reporting.** A Quarterly Financial Status Report (ETA 9130) is required until such time as all funds have been expended or the grant period has expired. Quarterly reports are due 45 days after the end of each calendar year quarter. On the final Financial Status Report, grantees must include any subaward amounts so we can calculate final indirect costs, if applicable. Grant recipients must submit the ETA 9130 using DOL's Online Electronic Reporting System. Specific instructions on how to use that system will be provided after award.

9. **Inquiries.** Questions concerning this TEGL should be submitted to the Office of Apprenticeship, (Torrey Cunningham at cunningham.torrey@dol.gov). Questions, concerning the submission process should be directed to Andrea Hill, Grants Management Specialist at hill.andrea@dol.gov.
10. **Paperwork Reduction Act (PRA) Statement.** According to the PRA, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The Department notes that a Federal agency may not conduct or sponsor a collection of information, nor is the public required to respond to a collection of information unless it is approved by OMB under the PRA, and displays a currently valid OMB control number (44 U.S.C. 3507). Also, notwithstanding any other provisions of law, no person shall be subject to penalty for failing to comply with a collection of information if the collection of information does not display a currently valid OMB control number (44 U.S.C. 3512). The currently valid OMB Control Number for this collection is OMB No 1225-0086.
11. **Resources.**
- ApprenticeshipUSA home page: <http://www.dol.gov/apprenticeship>
 - ApprenticeshipUSA Toolkit: <http://www.dol.gov/apprenticeship/toolkit.htm>
 - Version for Download:
http://www.doleta.gov/oa/employers/apprenticeship_toolkit.pdf
 - Pre-Apprenticeship: Pathways for Women into High-Wage Careers: A Guide for Community-Based Organizations and Workforce Providers
<http://www.doleta.gov/oa/preapp/>
 - Federal Resources Playbook: <http://www.doleta.gov/oa/federalresources/playbook.pdf>
 - State Apprenticeship Agency Contacts: <https://www.doleta.gov/oa/stateagencies.cfm>
12. **Attachment.**
Attachment I: ApprenticeshipUSA Action Planning Tool

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| EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210 | CLASSIFICATION ApprenticeshipUSA/Registered Apprenticeship |
| | CORRESPONDENCE SYMBOL OA |
| | DATE April 27, 2016 |

**ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 19-15,
CHANGE 1**

TO: STATE GOVERNORS
 STATE APPRENTICESHIP AGENCIES
 STATE WORKFORCE AGENCIES
 STATE WORKFORCE ADMINISTRATORS
 STATE WORKFORCE LIAISONS
 STATE AND LOCAL WORKFORCE BOARD CHAIRS AND DIRECTORS
 STATE EDUCATION AGENCIES
 STATE ECONOMIC DEVELOPMENT AGENCIES

FROM: PORTIA WU /s/
 Assistant Secretary

SUBJECT: Change 1 to ApprenticeshipUSA Funding Announcement: State Accelerator
 Grants

1. **Purpose.** To correct the Catalog of Federal Domestic Assistance (CFDA) number in the TEGL which is required to apply for ApprenticeshipUSA funding at www.grants.gov. The correct CFDA number is 17.285 (not 17.201 as previously cited).

Also, this TEGL alerts applicants to direct ApprenticeshipUSA program questions to Cierra Mitchell in the Office of Apprenticeship at mitchell.cierra@dol.gov. Questions concerning the submission process should continue to be directed to Andrea Hill, Grants Management Specialist at hill.andrea@dol.gov.

2. **Background.** The CFDA is a government-wide compendium of Federal programs, projects, services, and activities that provide assistance or benefits to the American public. It contains financial and nonfinancial assistance programs administered by departments and establishments of the Federal government.

The CFDA number 17.285 is the dedicated number assigned to ApprenticeshipUSA programmatic funding (including, the State Accelerator Grants).

3. **Instructions.** States should follow Section 7 of TEGL 19-15 (http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=5364) for Submission Procedures and Timeline, while noting the that electronically submitted SF-424 through Grants.gov must include the **CFDA number, 17.285** for the Estimated Funding Item #11.

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| RESCISSIONS None | EXPIRATION DATE Continuing |
|----------------------------|--------------------------------------|

4. **Inquiries.** ApprenticeshipUSA program questions should be directed to Cierra Mitchell in the Office of Apprenticeship at mitchell.cierra@dol.gov. Questions concerning the submission process should be directed to Andrea Hill, Grants Management Specialist, at hill.andrea@dol.gov.

ATTACHMENT "J"

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| EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210 | CLASSIFICATION TAA |
| | CORRESPONDENCE SYMBOL OTAA |
| | DATE April 29, 2016 |

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 21-15

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS
AFFILIATE AMERICAN JOB CENTER MANAGERS
COMPREHENSIVE AMERICAN JOB CENTER MANAGERS
STATE WORKFORCE ADMINISTRATORS
STATE AND LOCAL WORKFORCE BOARD CHAIRS AND DIRECTORS
STATE LABOR COMMISSIONERS
RAPID RESPONSE COORDINATORS
TRADE ADJUSTMENT ASSISTANCE LEADS

FROM: PORTIA WU /s/
Assistant Secretary

SUBJECT: Fiscal Year (FY) 2016 State Initial Allocations for Trade Adjustment Assistance (TAA) Training and Other Activities and the Process for Requesting TAA Reserve Funds

1. Purpose. To assist State Workforce Agencies or agencies designated by Governors as "Cooperating State Agencies" (CSAs) (also jointly referred to as "states") by identifying the FY 2016 Initial Allocation amounts to states and describing the formula methodology the Department of Labor (Department) used to calculate these amounts; and to describe the process for states to request TAA reserve funds for training, employment and case management services, job search allowances, relocation allowances, and related state administration.

2. References.

- Consolidated Appropriations Act, 2016, Division H, Title I (Pub. L. 114-113);
- Chapter 2 of Title II of the Trade Act of 1974, as amended (Pub. L. 93-618) (1974 Act, as amended) (Trade Act);
- Trade Adjustment Assistance Reform Act of 2002, Division A, Title I, Subtitle A of the Trade Act of 2002 (Pub. L. 107-210) (as amended by the Miscellaneous Trade and Technical Corrections Act of 2004 (Pub. L. 108-429)) (TAARA);
- Trade and Globalization Adjustment Assistance Act of 2009, Division B, Title I, Subtitle I of the American Recovery and Reinvestment Act of 2009 (TGAAA), (Pub. L. 111-5);
- Trade Adjustment Assistance Extension Act of 2011 (Pub. L. 112-40) (TAAEA);
- Balanced Budget and Emergency Deficit Control Act (BBEDCA), as amended by the Budget Control Act of 2011(BCA);
- Trade Adjustment Assistance Reauthorization Act of 2015 (Pub. L. 114-27) (TAARA 2015);

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| RESCISSIONS None | EXPIRATION DATE Continuing |
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- 20 CFR Part 618, Trade Adjustment Assistance, Subpart I; and
- TEGL No. 05-15, *Attachment A: Operating Instructions for Implementing the Amendments to the Trade Act of 1974 Enacted by the Trade Adjustment Assistance Reauthorization Act of 2015*.

3. **Definitions.**

- *The 2002 Program* means the TAA Program carried out under chapter 2 of title II of the Trade Act of 1974, as amended by the TAARA, and applies to workers covered by petitions filed before May 18, 2009, and to workers covered by petitions filed on or after February 13, 2011, and before October 21, 2011, who receive benefits under this program under section 231(a)(1)(B) of the TAAEA (the “election” provision).
- *The 2009 Program* means the TAA Program carried out under chapter 2 of title II of the Trade Act of 1974, as amended by the TGAAA and applies to workers covered by petitions filed on or after May 18, 2009, and on or before February 12, 2011.
- *The 2011 Program* means the TAA Program carried out under chapter 2 of title II of the Trade Act of 1974, as amended by the TAAEA and applies to workers covered by petitions filed on or after February 13, 2011, and on or before December 31, 2013, and to workers covered by petitions filed on or after February 13, 2011, and before October 21, 2011, who receive benefits under this program under section 231(a)(1)(B) of the TAAEA (the “election” provision).
- *The 2015 Program* means the TAA Program carried out under chapter 2 of title II of the Trade Act of 1974, as amended by the TAARA 2015 and applies to workers covered by petitions filed on or after January 1, 2014.
- *Training and Other Activities* means training, job search allowances, relocation allowances, employment and case management services, and related state administration.

4. Background. The Trade Act of 1974 (Pub. L. No. 93-618), as amended (the Act) (codified at 19 U.S.C. §§ 2271 et seq.), Title II, Chapter 2, established the Trade Adjustment Assistance for Workers (TAA), Alternative Trade Adjustment Assistance (ATAA), and Reemployment Trade Adjustment Assistance (RTAA) programs. These programs, collectively referred to as the Trade Adjustment Assistance Program (TAA Program), provide assistance to workers who have been adversely affected by foreign trade. The Consolidated Appropriations Act, 2016, signed into law on December 18, 2015, appropriates funds to carry out¹ the TAA Program through Fiscal Year (FY) 2016. The appropriation of \$861 million (which is subject to sequestration, as described below) is contained in the Department’s Federal Unemployment Benefits and Allowances (FUBA) account, and continues the full operation of the TAA Program through FY 2016. Under the language in the appropriations act, TAA Program funds are available during the fiscal year for the payment of Trade Readjustment Allowances (TRA), A/RTAA, training, employment and case management services, job search allowances, relocation allowances, and related state administration. The language specifically provides by cross-reference that the use of these funds includes the provision of Training and Other Activities to workers who are eligible for these activities under the 2002 Program, the 2009 Program, the 2011 Program, and the 2015 Program

¹ TRA and A/RTAA funds appropriated for FY 2016 are available for one fiscal year; however, Training and Other Activities funding is available for three fiscal years. CSAs may spend these Training and Other Activities funds in FYs 2016, 2017, and 2018. CSAs may refer to the FY 2016 TAA Annual Funding Agreement for additional information on the expenditure period for these funds.

in accordance with the requirements of the TAA law relating to those activities that were in effect at the time of filing of the petitions for certification that cover these workers. Specifically, the statutory language for FUBA in the Consolidated Appropriations Act reads as follows:

“For payments during fiscal year 2016 of trade adjustment benefit payments and allowances under part I of subchapter B of chapter 2 of title II of the Trade Act of 1974, and section 246 of that Act; and for training, employment and case management services, allowances for job search and relocation, and related State administrative expenses under part II of subchapter B of chapter 2 of title II of the Trade Act of 1974, and including benefit payments, allowances, training, employment and case management services, and related State administration provided pursuant to section 231(a) of the Trade Adjustment Assistance Extension Act of 2011 and section 405(a) of the Trade Preferences Extension Act of 2015, \$861,000,000 together with such amounts as may be necessary to be charged to the subsequent appropriation for payments for any period subsequent to September 15, 2016: Provided, that notwithstanding section 502 of this division, any part of the appropriation provided under this heading may remain available for obligation beyond the current fiscal year pursuant to the authorities of section 245(c) of the Trade Act of 1974 (19 U.S.C. 2317(c)).”

5. Application of Sequestration. BBEDCA, as amended by the BCA, requires a reduction for FY 2016 of 6.8 percent in budget authority for direct spending (sometimes referred to as “mandatory”) programs, which includes the TAA Program. Therefore, the \$861,000,000 appropriation for FY 2016 to carry out the TAA Program must be reduced by 6.8 percent (or \$58,548,000), leaving a total appropriation of \$802,452,000 available for distribution to the states. As it has done in previous years, the Department is applying the entire \$58,548,000 reduction to the funds for Training and Other Activities rather than applying reductions to each payment of TRA or A/RTAA. Specifically, the pre-sequestration amount of \$450,000,000 for Training and Other Activities described in the preceding paragraph is reduced by the \$58,548,000 required by sequestration, resulting in a FY 2016 national aggregate amount of \$391,452,000 available for Training and Other Activities. Information relating to available funding provided to states in the FY 2016 Initial Allocation by activity and amount is provided in the sections below.

6. FY 2016 National Aggregate Amount Available for Training and Other Activities. The FY 2016 funding allocated to states is to be used to carry out the 2002 Program, the 2009 Program, the 2011 Program, and the 2015 Program. In determining the FY 2016 funding available for TAA Training and Other Activities, the Department has taken into account both the funds appropriated to continue the full operation of the four programs and the application of sequestration, which results in the national aggregate amounts as follows:

- \$391,452,000 is the FY 2016 national aggregate amount available for expenditures for Training and Other Activities, which include funds for job search allowances, relocation allowances, employment and case management services, and related state administration to carry out all four programs. Of this amount:

- \$39,145,200 (or 10 percent of \$391,452,000) is the portion of FY 2016 funds available for related state administration. This percentage represents the *maximum* amount of FY 2016 funds that can be used for expenditures for state administration and was established to ensure that states have sufficient resources to provide continuity of service for the programs, as specified in TEGL No. 5-15, Attachment A, Section D.1. *Note: A state may NOT use more than 10 percent of its FY 2016 Training and Other Activities Allocation for costs related to state administration. However, a state may use a portion of the funds available for state administration for training, if needed, as long as these funds are not needed for state administration.*
- No less than \$19,572,600 (or a minimum of 5 percent of the FY 2016 funds available for Training and Other Activities) is the portion available to provide employment and case management services to TAA Program participants certified under the 2009 Program, the 2011 Program, and the 2015 Program. FY 2016 Training and Other Activities' funds may not be used to provide employment and case management services to workers covered by petitions certified under the 2002 Program. This five percent minimum is required to ensure TAA funds are available to provide the employment and case management activities to which workers under those programs are entitled, as specified in TEGL No. 5-15, Attachment A, Section G. *Note: A state may use more than the five percent (minimum) of the amount allocated to it for Training and Other Activities to provide TAA-funded employment and case management services if it determines that more funds are needed to provide such services to adversely affected workers in its state.*

7. Initial Allocations for FY 2016 Funds. The Department has determined the FY 2016 allocation of funds to states to provide training, job search allowances, relocation allowances, and related state administration (also referred to as Training and Other Activities) under all four programs, and to make available TAA-funded employment and case management services for 2009 Program, 2011 Program, and 2015 Program participants, based on the regulations at 20 CFR 618.910 through 618.940, as follows:

- Sixty-five (65) percent of the fiscal year funds are to be distributed by formula when the appropriation for the full fiscal year is available to the Department, with 35 percent of the FY 2016 funds held in reserve for distribution later in the fiscal year (or to be provided to a state in need of reserve funds at any time during the fiscal year as explained below);
- The *hold harmless* provision minimum allocation for the initial distribution is applied to ensure that a state receives at least 25 percent of the Initial Allocation that was made available to that state for the previous fiscal year;
- By July 15, 2016, at least 90 percent of the fiscal year funds are to be distributed; and
- The formula factors the Department must consider in determining the apportionment of the initial distribution of funds are specified in 20 CFR 618.910(f) and further described below in Section 8.

The calculation of the national aggregate amount for the FY 2016 Initial Allocation (65 percent of the amount available for Training and Other Activities) is \$254,443,800.

8. Application of the Funding Formula and Process for Requesting Reserve Funds.

Attachment A to this TEGl provides the amounts of FY 2016 funds that will be distributed in the Initial Allocation, by state. These amounts were determined under the TAA funding formula as described in 20 CFR 618.910(f) and summarized below:

A. TAA Formula Funds:

1. Trend in number of workers covered by certifications during the most recent four consecutive calendar quarters for which data are available;
2. Trend in number of workers participating in training during the most recent four consecutive calendar quarters for which data are available;
3. Number of workers estimated to be participating in training during the fiscal year; and
4. Estimated amount of funding needed to provide approved training to such workers during the fiscal year.

Factor 1 will be established using the most recent four quarters (FY 2015 Quarter 1 through FY 2015 Quarter 4) of data for certified workers by state, and the quarters will be weighted 40 percent; 30 percent; 20 percent; and 10 percent, respectively, from the most recent to the earliest quarter. This approach will establish a trend, giving the most recent quarters a greater impact on each factor than an earlier quarter.

Factor 2 will be established using the most recent four quarters (FY 2015 Quarter 1 through FY 2015 Quarter 4) of data for workers participating in training by state, and the quarters will be weighted 40 percent; 30 percent; 20 percent; and 10 percent, respectively, from the most recent quarter to least recent quarter. As with Factor 1, this approach will establish a trend, giving the most recent quarters a greater impact on each factor than an earlier quarter.

Factor 3 will be determined by dividing the weighted average number of training participants for the state determined in Factor 2 by the sum of the weighted averages for all states and multiplying the resulting ratio by the projected national average of training participants for the fiscal year, using the estimates underlying the Department's most recent budget submission or update.

Factor 4 will be calculated by multiplying the estimated number of participants in Factor 3 by the average training cost per participant in the state. The average training cost will be calculated by dividing total training expenditures for the most recent four quarters by the average number of training participants for the same period.

Once each of the four factors have been determined for each state, under 20 CFR 618.910(f)(3) all four factors will be assigned an equal weight. For FY 2016, the weight will be 25 percent of the total for each factor.

Section 618.910(c) of 20 CFR includes a *hold harmless* provision. The regulation provides that a state's Initial Allocation must be at least 25 percent of the amount the state received in its Initial Allocation for the prior fiscal year.

The Department will determine each state's percentage of the national total for each factor. Using each state's percentage of each of these weighted factors, the unadjusted percentage that the state will receive of the amount available for initial allocations will be determined. Following 20 CFR 618.910(c) through (e), a state's allocation amount less than \$100,000 will be removed from the calculation, as described below, and the statutory 25 percent *hold harmless* provision will be applied, resulting in the adjusted FY 2016 Initial Allocations for the remaining states.

In those instances where the formula approach would give a state less than \$100,000, 20 CFR 618.910(e)(2)(i) is applied. Under that regulation, a state with an allocation calculated under the formula to be an amount less than \$100,000 will not receive any initial allocation. Those states may request TAA Program reserve funds in accordance with the procedures described below in Section B.

B. TAA Program Reserve Funds: States may request reserve funds in accordance with 20 CFR 618.920(b) before the distribution of the Initial Allocation, and at any other time during the fiscal year. States must use the Reserve Funding Request Form ETA-9117 (OMB No. 1205-0275) to request these funds.

To be eligible for TAA Program reserve funds, a state must demonstrate that at least 50 percent of TAA funds made available to that state in the current fiscal year and the two preceding fiscal years have been expended or that the state needs additional funds to meet unusual or unexpected events. A state requesting reserve funds must also provide a documented estimate of expected funding needs through the end of the fiscal year. A state must base its estimate on an analysis that includes at least the following:

- The average cost of training in the state;
- The expected number of participants in Training and Other Activities through the end of the fiscal year; and
- The remaining funds the state has available for Training and Other Activities.

9. Recapture and Reallocation of Funds. Section 245(c) of TAARA 2015, in conjunction with the language cross-referencing that section contained in the Consolidated Appropriations Act, 2016, Division H, Title I, under the FUBA heading, provides authority for the Department to recapture unexpended TAA funds from states that have not fully used their funding in the second and third fiscal year after the fiscal year in which the funds were provided to the state, and reallocate those funds to other states to provide and administer employment and case management services, training, job search allowances, and relocation allowances. The Department will implement Section 245(c) by establishing procedures for recapture of these funds and reallocating them to meet state funding needs for Training and Other Activities, as specified in TEGL No. 5-15, Attachment A, Section D.1.1., and will issue guidance at a future date.

10. Action Requested. CSAs are required to implement the guidance set forth herein and must continue to administer the TAA Program in accordance with applicable Operating Instructions for the 2002 Program, the 2009 Program, the 2011 Program, and the 2015 Program. CSAs must inform all appropriate staff of the contents of this guidance.

11. Inquiries. Inquiries regarding this guidance should be directed to the appropriate Regional Office.

12. Attachment. Attachment A: TAA FY 2016 Initial Allocation Amounts by State

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| TRAINING AND EMPLOYMENT NOTICE | NO. 30-15 |
| | DATE March 8, 2016 |

TO: AMERICAN JOB CENTER DIRECTORS
DEPARTMENT OF LABOR EMPLOYMENT AND TRAINING REGIONAL ADMINISTRATORS
STATE WORKFORCE INNOVATION OPPORTUNITY ACT LIAISONS AND ADMINISTRATORS
STATE WORKFORCE DEVELOPMENT BOARD (WDB) CHAIRS
LOCAL WDB CHAIRS
STATE WDB EXECUTIVE DIRECTORS
LOCAL WDB EXECUTIVE DIRECTORS

FROM: PORTIA WU /s/
Assistant Secretary
Employment and Training Administration

Subject: Release and Availability of a Report, *"Evaluation of the Jobs and Innovation Accelerator Challenge Grants: Interim Findings on Multiagency Collaboration and Cluster Progress"*

1. **Purpose.** To announce the release and availability of an interim report, *"Evaluation of the Jobs and Innovation Accelerator Challenge Grants: Interim Findings on Multiagency Collaboration and Cluster Progress,"* and to explain the context and background on multiagency collaboration for regional industry clusters; describe the goals and activities of the Jobs and Innovation Accelerator Challenge (JIAC) and Advanced Manufacturing – Jobs and Innovation Accelerator Challenge (AM-JIAC) regional industry clusters; provide Federal perspectives on progress through the summer of 2014; summarize industry cluster reports including participant characteristics, services and workforce outcomes through June 2014; and share next steps for the study.
2. **References.**
 - H-1B Technical Skills Training funding for the Jobs and Innovation Accelerator Challenge and the Advanced Manufacturing-Jobs Innovation Accelerator Challenge grants, Federal Funding Opportunities issued on May 20, 2011, and May 24, 2012.
 - Section 414(c) of the American Competitiveness and Workforce Improvement Act of 1998, as amended in 29 U.S.C. § 2916a.
3. **Background.** Starting in May 2011, the Administration launched four, multiagency initiatives to accelerate job creation and economic growth through both public and private partnerships. The initiatives include the JIAC, AM-JIAC, Rural JIAC, and Make-It-In-America grants. Eight funding partners provided both financial and technical resources for

these initiatives and another 15 Federal agencies offered technical assistance to support the grant awardees. Collectively across the four initiatives, 53 projects in 30 states received a total of \$86.5 million, the Employment and Training Administration's (ETA's) evaluation efforts are being conducted to learn more from two specific initiatives: JIAC and AM-JIAC, also called the Jobs Accelerator grants.

In August 2013, the ETA contracted with Mathematica Policy Research and the W.E. Upjohn Institute for Employment Research to conduct a process evaluation of the Jobs Accelerator grants. These first two rounds of grants are funded by a total of five Federal agencies: the Department of Labor's ETA; the U.S. Department of Commerce, Economic Development Administration (EDA); the U.S. Small Business Administration (SBA); the U.S. Department of Commerce, National Institute of Standards and Technology, Hollings Manufacturing Extension Partnership (NIST MEP); and the U.S. Department of Energy (DOE). Multi-agency grants were awarded to 20 JIAC clusters in 2011 and 10 AM-JIAC clusters in 2012. Both grant initiatives run through the fall of 2015.

When completed, this study will more thoroughly explore and examine the structures and processes created to support these regional cluster initiatives, including the: (1) roles of multiagency collaborations in regional clusters; (2) ways in which regional clusters, programs, and partnerships develop; (3) types of workforce-related outcomes achieved through these types of initiatives; (4) management structures and practices implemented to promote sustainability; and (5) lessons learned through implementation.

This interim report identifies the extent and nature of the Federal partner collaboration; provides an overview of the clusters and proposed activities; discusses the Federal perspective on progress; and summarizes preliminary participant data. The report also describes the selection criteria used to identify the clusters for the evaluation site visits proposed in 2015 and the data sources used to select the sites and complete the report.

4. **Research Design and Analytical Approach.** The primary sources of data for this evaluation include grant document reviews (grant applications and agreements, quarterly ETA performance reports, and integrated work plan progress reports); telephone interviews with Federal agency representatives; site visits to a subset of grantee clusters; and a survey of partner organizations. The process evaluation focuses on answering five key questions about the JIAC and AM-JIAC initiatives:

- What is the role of multiagency collaboration in the planning and implementation of cluster activities?
- How and in what ways do regional clusters, programs, and partnerships develop under the grant?
- What workforce-related outcomes did the clusters report achieving through this initiative?
- How is the initiative managed within each cluster? What practices are being implemented to promote sustainability of grant resources, partnerships, and activities?
- What are key lessons learned through implementation? How and under what circumstances might these lessons be replicated?

5. **Interim Report Findings.** The early implementation findings of the JIAC and AM-JIAC study describe the innovative, multiagency approaches developed to accelerate job creation and economic growth through both public and private sector partnerships. The interim report delves into grant management activities, goals and some outcomes; Federal partner perspectives and technical assistance activities; JIAC and AM-JIAC cluster goals and proposed activities; and grantee performance and progress reports. Among the early findings, the interim report highlights are:

- Multiagency collaboration roles were viewed as distinctive among the number of Federal partners involved. While the Federal funding opportunities (FFO) were unique and challenging, Federal staff respondents viewed the FFO development as successful collaborative efforts.
- Regional industry clusters included a range of multiple county initiatives across urban, suburban and rural areas. While the AM-JIAC grants exclusively focused on advanced manufacturing, the JIAC grants included common industry sectors such as renewable energy and information technology.
- Federal agency perceptions from interviews conducted midway through the ETA grantees' periods of performance indicated that many of the regional clusters were making progress toward cluster, partner and other agency goals. Given the individual agencies' staggered performance periods, by design many EDA, SBA, NIST MEP, and DOE activities were completed or in the final phases by the summer of 2014. ETA-funded grants were expected to continue beyond the fall of 2015.
- ETA-funded education and training activities, including supportive services, were available for eligible jobseekers through JIAC grants and the public workforce system. As of June 30, 2014, both the JIAC and AM-JIAC grant projects had served slightly more than 3,500 participants. Of those participants enrolled in grant activities, more than 99 percent in JIAC clusters and more than 93 percent in AM-JIAC clusters participated in education and training activities; classroom occupational training accounted for the largest set of training activities.

The interim report analysis is descriptive, and results do not support causal relationships. Other limitations are described in the report. The preliminary analysis and early findings will inform the next steps and final report of this evaluation.

6. **Inquiries.** To view an abstract of this publication, as well as download the full report, visit the ETA Research Publication Database Website at:
<http://wdr.doleta.gov/research/keyword.cfm>.

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| TRAINING AND EMPLOYMENT NOTICE | NO. 33-15 |
| | DATE April 18, 2016 |

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS
STATE LABOR MARKET INFORMATION DIRECTORS
STATE AND LOCAL WORKFORCE BOARDS
ONE STOP OPERATORS
AMERICAN JOB CENTERS
ETA GRANTEES

FROM: PORTIA WU /s/
Assistant Secretary

SUBJECT: Announcement of the Launch of WorkforceGPS

1. **Purpose.** To announce the launch of WorkforceGPS.org — the Employment and Training Administration's (ETA) new technical assistance website. WorkforceGPS.org will replace Workforce3One.org immediately.
2. **Background.** America's public workforce investment system provides high quality services to thousands of individuals and businesses each year. The workforce professionals and other stakeholders who lead and operate that system need access to data, evidence, and information about effective and innovative approaches to maintain those high quality services in an ever-changing economy. Beginning in 2004, ETA met this need by providing an on-line learning communication and learning technical assistance platform called Workforce3One. Twelve years later, the site has over 122,000 regular users and hosts more than 4,000 individual resources. Advancements in technology and the passage of the Workforce Innovation and Opportunity Act have created new demands on the workforce system, and new opportunities to share knowledge and technical assistance. Therefore, ETA is replacing its legacy system with WorkforceGPS.org—a modern web platform designed to improve the user experience for its customers.
3. **About WorkforceGPS.** WorkforceGPS is an upgraded platform with capabilities that far exceed those of Workforce3One. It gives the public workforce system, education professionals, and business leaders more effective ways to search, save, and share resources—with improved capability to engage with peers. WorkforceGPS is the future of ETA's technical assistance.

WorkforceGPS is still a committed community of public workforce system stakeholders; it is still a place to find great technical assistance resources, and take advantage of online learning opportunities. A key feature of the new website is its consistent look and feel. It is designed

to make the user experience easy and uncomplicated across all devices—desktop computers, tablets, or your smart phone—so you can spend less time trying to find the right tools and more time using them. WorkforceGPS is **the** tool for all your technical assistance needs!

4. New Features:

- **Straightforward and consistent navigation with a responsive interface.**
WorkforceGPS can be accessed on your desktop, laptop and across mobile devices. Additionally, WorkforceGPS and its Communities of Practice and Collections have a consistent site design—once you're familiar navigating within one Community or Collection, you understand them all.
 - A Collection is a group of resources relevant to a specific topic or target population.
 - A Community of Practice is a group of resources related to a topic or target population, with added features intended to promote peer-to-peer interaction and learning within that community. Additional features include discussion topics, blog posts, and sometimes chat.
- **Search.** WorkforceGPS uses an improved search engine tool that allows you to search the entire site or hone in within a specific Community or Collection. Additionally, all content and resources throughout WorkforceGPS are tagged using a comprehensive and consistent taxonomy that ETA developed with the workforce system in mind. This allows you to search for what you need by activity, program, target population, geographic location, industry/sector, or content type.
- **Save.** Becoming a registered member has its perks. Once registered, with just a mouse click you can save all your favorite resources for easy retrieval on My WorkforceGPS. Additionally, all webinars that you attend are automatically saved to your user profile under My Events—this is **the** place for your stuff.
- **Share.** WorkforceGPS makes it easier than ever to share resources. Not only can you quickly find and save resources, which make them easy to find again for future use, but with a simple mouse click, you can easily send a favorite resource to a peer via email or share it on social media with the hashtag #FoundItOnWFGPS.

5. Other Key Features:

- **You Might Also Like.** When you land on a selected resource, WorkforceGPS uses the power of its comprehensive taxonomy to automatically populate a list of other like resources that may also be of use, similar to what you see on many retail websites.
- **Staff Picks & Other Resource Lists.** Just like a good bookstore, WorkforceGPS is designed to make it easier for you to find exactly what you are looking for—even if you don't know precisely what that is. That's why WorkforceGPS has curated a list of Staff Picks—resources that are highly recommended as best-in-class for users by ETA

staff. Wherever you see the Staff Pick icon, it's worth taking a look. You can also browse resources by additional lists like top-rated resources and recently added content.

6. **Action Requested.** All current registered Workforce3One users will receive an email inviting them to register on WorkforceGPS.org. Once registered, users can take advantage of the MyWorkforceGPS features—My Profile, My Content, My Events, My Communities, My Membership & Notifications. Users can also join specific Communities and Collections, sign up for site notifications and newsletters, and start curating their own compilation of saved resources. Visit www.workforcegps.org to start navigating to success today!
7. **Inquiries.** For more information on WorkforceGPS, visit <https://www.workforcegps.org/>. For specific questions related to WorkforceGPS, email support@workforcegps.org.

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| TRAINING AND EMPLOYMENT NOTICE | NO. 35-15 |
| | DATE May 4, 2016 |

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS
STATE AND LOCAL WORKFORCE BOARDS
AMERICAN JOB CENTER DIRECTORS

FROM: PORTIA WU /s/
Assistant Secretary

SUBJECT: Encouraging Collaborations between the Workforce Investment System and Public Libraries to Meet Career and Employment Needs.

1. **Purpose.** To encourage collaborations between the workforce investment system and public libraries to improve the quality and quantity of employment and training services to job seekers and employers.
2. **References.**
 - Workforce Innovation and Opportunity Act
 - Training and Employment Notice 50-09 "Encouraging Partnerships between the Workforce Investment System and Public Libraries to Meet Career and Employment Needs"
3. **Background.** Public libraries have played an important role in addressing the varied employment-related needs of American workers, job seekers, and employers. The Workforce Innovation and Opportunity Act (WIOA) recognizes this role, and specifically identifies public libraries as optional partners in American Job Centers, particularly but not limited to helping library visitors find workforce and labor market information, and assistance searching for jobs. According to a report released by the U.S. Impact Study (<https://www.imls.gov/assets/1/AssetManager/OpportunityForAll.pdf>), at the height of the recession more than 30 million Americans reported using library computers for workforce related needs. By 2013, 96 percent of respondents to the 2013 Digital Inclusion Survey (a survey of public libraries throughout the country) offered online job and employment resources. Additionally, the survey found 78 percent of responding libraries offered programs to help the public apply for and obtain jobs.

Collaboration with public libraries can increase the quality and quantity of access points for individuals to receive needed career information and assistance. The U.S. Department of Education Office of Career, Technical, and Adult Education (OCTAE) issued a Dear Colleague Letter in July 2014 with the Institute of Museum and Library Services to encourage greater collaboration between libraries and adult education (WIOA, title II) programs to help more Americans take advantage of the educational, employment, financial, health, social and civic resources that are available online. The Employment and Training Administration (ETA) has also encouraged collaboration between the workforce system and libraries as a way to expand access for all jobseekers to the information and services needed to gain employment (See Training and Employment Notice 50-09 "Encouraging Partnerships between the Workforce Investment System and Public Libraries to Meet Career and Employment Needs" available at (http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2920)).

In addition to offering public computers and Internet access for job seekers and individuals, many libraries also provide space for employers as they host career fairs and networking events. As trusted institutions within their communities, libraries are often at the front-line of employment and training related inquiries. Additionally, libraries also serve school-aged youth who can use public resources for career and education planning along with the traditional adult job seeker.

For example, in 2015, the New Jersey Department of Labor and Workforce Development selected 26 public libraries to serve as access points for New Jersey's workforce services. These libraries distribute job search information and assist job seekers in using New Jersey's digital job search platform to help connect job seekers with jobs.

Another example of collaboration between the workforce system and public libraries occurred in Maryland. In 2012, the Maryland Public Library signed a formal partnership agreement with the Maryland Department of Labor (MDOL). The partnership included the expansion and refinement of web-based resources that both the Maryland Public Libraries and the MDOL make available to the public, raising the public's awareness of the MDOL's website, "Maryland Workforce Exchange."

The above examples show how the workforce system can increase its reach and visibility by collaborating with libraries as partners. Many states and local areas are acting upon the mutual benefits of collaboration between the workforce system and libraries, using Federal, state and local funding to improve coordination of employment and training, adult education, and literacy services to the community. ETA encourages collaborative efforts, such as:

- Leveraging of digital literacy activities occurring in public libraries;
- Collaborating to train library staff about in-person and virtual employment and training resources available through the public workforce system;
- Inclusion of libraries as a stop on the route of mobile American Job Centers;
- Using space available at a library to provide career assistance and employment services to library patrons (e.g. familiarizing patrons with career resources available electronically or in-person at American Job Centers) or to host career events (e.g. job fairs);
- Sharing workforce and labor market information, including data on high-growth industries and occupations from the public workforce system to libraries;
- Signing of memoranda of understanding or other formal agreements; and
- Co-locations between American Job Centers and libraries.

4. **Existing Partnerships and Activities.** ETA and OCTAE have undertaken activities to support partnerships with libraries, including:

- Library locations are included in America's Service Locator (www.servicelocator.org), a national online search tool. Anyone can easily locate the nearest library along with an American Job Center or social service provider within their community.
- The American Library Association, Institute of Museum and Library Services, U.S. Department of Education and the U.S. Department of Labor introduced WIOA to libraries and stakeholders across the country (<http://www.districtdispatch.org/2014/10/webinar-archive-available-2-2-billion-reasons-libraries-care-wioa/>).
- ETA has provided training for librarians and other staff on the national electronic tools, including the workforce information portal CareerOneStop (www.careeronestop.org) and the occupation database O*NET (<http://online.onetcenter.org>).

- ³ ETA, OCTAE and IMLS have highlighted library partnerships in technical assistance efforts, and will continue to develop tips and share best practices on effective partnerships between libraries and the public workforce investment system.
5. **Action Requested.** State and local workforce development boards, state workforce agencies, and American Job Centers are encouraged to collaborate with public libraries to complement and extend the career and employment services available through the public workforce system to job seekers and unemployed workers.
 6. **Inquiries.** Please direct questions concerning this Training and Employment Notice to the appropriate ETA regional office.