

MAYOR'S OFFICE OF EMPLOYMENT DEVELOPMENT
Workforce Investment Act
Five Year Plan Extension
PY 2005
May 1, 2005

III. GENERAL NARRATIVE

A. WIA Organization

Grant Recipient and Administrative Entity Identification

The Mayor's Office of Employment Development will be both the grant recipient and the administrative entity representing the Baltimore City Local Workforce Investment Area (LWIA) and the Baltimore City Workforce Investment Board (BWIB). The mailing address is:

Mayor's Office of Employment Development
417 E. Fayette St., Suite 468
Baltimore, Maryland 21202
Director: Karen Sitnick
Telephone: 410-396-1910

E-Mail: ksitnick@oedworks.com

B. Title I Operational Areas

1. Collaborative Local Labor Market Plan - Describe how your local labor market needs will be used to further the goals outlined in your local Unified Plan.

The Baltimore Workforce Investment Board (BWIB) recognizes that the labor market is regional and that substantial opportunity for employment lies both inside and outside city boundaries. To inform its initial discussions, the BWIB had assembled the labor market information that existed in published reports (information was appended to the draft Unified Plan). That information provided a very broad-brush perspective and while helpful in framing the policy issues, it was not detailed enough to make vital and specific programming decisions. Thus, the BWIB's Planning Committee, which included members from economic development and business, established criteria for the selection of target sectors that represent high growth/high demand industries and offer opportunities for workforce preparation strategies to prepare Baltimore residents for careers. Research and analysis was conducted and the following six target industries were identified on which to focus workforce development efforts: Health Care and Social Assistance; Bioscience; Business Services; Computer, Internet, Data and Software Related Services; Hospitality and Tourism; and Construction.

There were 602,733 Baltimore City residents in 2003, down by over 7% from the 651,154 people that lived in Baltimore during the 2000 U.S. census. About three quarters of the population 25 or older in Baltimore City had a high school diploma or an equivalent, and slightly less than one quarter of people 25 or older had bachelor's degrees. The median age of Baltimore City residents was 36.9 years. Black / African American people accounted for almost two-thirds of the city's population. Around 31% of people were white / Caucasian. The remaining 4% of people identified themselves as belonging to some other race or a mixture of races. Independent of race, about 2% of Baltimore City residents identified themselves as being Hispanic or Latino.

About 64% of Baltimore City's population, aged 16 years or older, participated in the labor force, which consisted of 270,312 people in 2004. This number represents a decrease of 6.3% from 2003 and a decrease of 7% from 2000.

Baltimore City's unemployment rate ranged from 6.9% to 7.9% in 2004, with an annual average of 7.4%. For the first quarter of 2005, the unemployment rate averaged 7.7%.

Jobs in Baltimore City decreased by 3.7% from 2001 through 2003. Employment in government jobs fell by 1.6%, and the private sector saw its payrolls drop by 4.3%. Goods producing industries were hit much harder (-12.3%) than were service-producing industries (-3.0%). Although employment in most areas of the service-producing sector decreased, the losses were tempered by gains in leisure and hospitality and education and health services. The largest decreases during this time period were experienced by industries in information and manufacturing.

The large majority of people (72%) in Baltimore City's workforce were private wage and salary workers. Government agencies employed about 22% of the people in Baltimore City, and about 5% of people were self-employed by a non-incorporated businesses. Less than 1% of workers were unpaid family workers.

Using data provided by DLLR, MOED monitors and tracks changes in labor market information about Baltimore City, The Baltimore Metropolitan Statistical Area, and Maryland. This information includes, but is not limited to: labor force size, unemployment rate, average wages paid within sectors and industries, layoffs and plant closings, industry profiles, occupational profiles, and employment and wage information for firms of different sizes.

The GWIB's cluster industry series, found on DLLR's website, provide MOED with information that can be used to guide decisions about training and job development within high-growth industries. The cluster analyses provide industry information about wages, employment growth, and firm size. Additionally, the occupational analyses provide information about the wages, employment opportunities, and educational/training requirements.

Baltimore's Unified Plan is designed to develop a workforce development system that engages partners and stakeholders in a process of building strategies that "unify" their work for a common goal. These strategies include working in partnership with and providing for the needs of workforce system partners to develop upgraded information about industries and occupations in which growth will occur, the knowledge, skills and abilities needed for those occupations, designated career paths and strategies to reduce, if not, eliminate barriers to employment for Baltimore residents.

In the spring of 2005, the BWIB's Workforce System Effectiveness Committee published *The State of Workforce Training in Baltimore, 2004: An Inventory of Resources, Needs, Activities and Gaps* and adopted the following recommendations as the working strategy vehicle for future progress.

Recommendation #1: The Baltimore Workforce Investment Board (BWIB) should recognize education and training of our workforce as one of its prime areas of strategic interest, and take the lead in immediate and significant efforts to increase the public and private financial resources.

Recommendation #2: The BWIB should adopt workforce training goals as a "call to action". It should set objectives and milestones to measure progress, report periodically on movement towards achieving goals, and make recommendations for continuous improvement of programs and processes.

Recommendation #3: The BWIB should work to align training investments so as to create a better match between the demand for skills and the available supply of job seekers at the different levels of training requirements.

Recommendation #4: The BWIB should encourage all training providers receiving public workforce funds to report their activities and outcomes to BWIB on a common and consistent basis.

Recommendation #5: The BWIB should require a "State of Workforce Training in Baltimore" report once every three to five years.

Recommendation #6: The BWIB should work to focus workforce training resources on the needs of the City's existing chosen "target industries."

Recommendation #7: The BWIB should host an annual awards competition and banquet recognizing and rewarding exemplary workplace learning efforts by employers.

In addition, the BWIB through its Public Policy Committee continues to address legislative and administrative barriers to employment for diverse populations of job seekers. The priorities adopted by the board include:

- Increased resources for training of low-wage incumbent workers and job seekers and adult literacy and workplace literacy training
- Increased resources for training of Incarcerated Individuals and ex-offender employment
- Additional resources for connecting youth to employment and training thus enhancing the pipeline of qualified job seekers into the workforce

2. Local Governance

- a. **Describe the role of the BWIB to coordinate and interact with local elected officials regarding the following Title I activities and functions:**

The role of the Board and the relationship with the Mayor is presented in the BWIB/LEO (Local Elected Official) agreement, (Attachment 5). The Board has been charged by the Mayor to provide the overall guidance, strategic planning, and coordination for the workforce development system in Baltimore. The Director of the Mayor's Office of Community Foundation and Profit Investment has been designated by the Mayor to serve as his representative on the board. The Board will report to the Mayor, on a regular basis, on its progress and accomplishments.

The BWIB will continue to coordinate its activities with local officials by providing the local elected official with advance notice of all pending BWIB meetings and information on the agendas of the full board and committee meetings. The Board, its committees and task forces will be developing specific action plans for each major priority. These plans will be shared with the Mayor and cabinet in regular briefings. In addition, the Director of the Mayor's Office of Employment Development (MOED) is a member of the Mayor's Cabinet and will provide direct communication between the Cabinet and the BWIB.

Generally, the BWIB committees and task forces have been impaneled to deliberate on the workforce development issues and to coordinate the related activities and functions. Information about the following activities and functions will be provided to local officials through meetings with the Chief of Staff and through regular cabinet meetings of the Mayor.

- (1.) Developing the local workforce investment plan and conducting oversight of the one-stop system, youth activities and employment and training activities;**

To develop the initial five year local workforce investment plan, the City's WIB engaged in a one-day planning retreat focusing on three of six challenge areas required by the State, which resulted

in a series of goals and priority actions to achieve those goals. Subsequent to this retreat, the board impaneled five committees: Business Services, Youth Council, Career Center Network, Welfare Employment, and Evaluation Committees to develop strategies to reach these goals. In September 2000 the BWIB was formally and officially re-constituted as the Baltimore Workforce Investment Board (BWIB). Its new membership was appointed by the Mayor and approved by the Governor's Workforce Investment Board (GWIB) A new committee structure was defined as follows: Planning, Infrastructure, Marketing, Evaluation and Accountability, and the Youth Council. These committees, in concert with the Executive Committee worked to provide oversight and direction to youth activities, employment and training activities and the one-stop system.

The BWIB conducts annual strategic planning sessions and develops annual work plans based on the BWIB's overall role and key priorities. The BWIB's current structure was redesigned in the Fall of 2004 and now includes the following committees and task forces:

- Executive Committee
- Industry Sectoral Steering Committee
- Marketing Committee
- Public Policy Committee
- Workforce System Effectiveness Committee
- Youth Council
- Building Linkages with Baltimore's School System Task Force
- Connecting Target Populations to Jobs and Career Advancement Task Force

(2) Selecting one-stop operators with the agreement of the Local Elected Official;

In accordance with the grandfathering option provided through the Workforce Investment Act, the LEO appointed the Mayor's Office of Employment Development as the One Stop Operator for Baltimore City. Any changes relative to managing the activities of the individual centers will be done through a competitive process under the guidance of the BWIB and the LEO.

(3) Selecting eligible youth service providers based on the recommendations of the youth council, and identifying eligible providers of adult and dislocated worker intensive services and training services;

Eligible youth service providers will be identified in keeping with procedures outlined by the Youth Council. They will be approved by the BWIB.

Adult providers selected in accordance with State guidelines may also be eligible to provide older youth occupational skills training.

Providers of pre-vocational and intensive services for adults and dislocated workers will be selected via agreements with partners or through a competitive process in keeping with established procedures. Training providers of the Individual Training Accounts will be selected according to State guidance.

(4) Developing a budget for the purpose of carrying out the duties of the local board;

The BWIB does not have a budget that is separate and apart from that of the Mayor's Office of Employment Development.

(5) Negotiating and reaching agreement on local performance measures;

The State defined WIA performance measures are used to report local performance. The BWIB will explore negotiations with the State regarding adjustments and local performance standards under WIA. The BWIB, through its Workforce System Effectiveness Committee, is identifying other locally based performance benchmarks to review at regular intervals

(6) Assisting the Governor in developing the Statewide Employment Statistics System under the Wagner-Peyser Act.

Assistance was provided by MOED in the development of the Statewide Employment Statistic System under the Wagner-Peyser Act.

(7) Coordinating workforce investment activities with economic development strategies and developing employer linkage.

An MOED staff person, the Business Liaison, functions as the Workforce liaison to the Baltimore Development Corporation (BDC).

This staff person works in conjunction with the BDC when employers indicate that there is an impending company expansion or a workforce development need. This close coordination of effort between BDC and MOED results in advance notice to MOED of employers who are planning a move to Baltimore City or as an expansion of their current business. This relationship allows MOED to meet with the company to present workforce development services.

Reviewing these relationships and advising on ways to increase coordination of workforce investment activities with economic development will be accomplished through the Industry Sectoral Steering Committee of the BWIB.

3. **Local Board Staffing**

The MOED provides direct staff support to the BWIB and its committees. Several local foundations in conjunction with MOED support staff who work on behalf of the Workforce System Effectiveness Committee to conduct research on workforce development system issues and identify promising practices.

The BWIB does not provide core, intensive services, or training services, and is not certified as a One Stop operator. This follows the directives outlined in WIFI 9-99.

4. **Youth Council**

Describe how the Youth Council will coordinate and interact with the BWIB and LEO regarding youth activities and functions.

Baltimore City's Board developed and implemented the following policy for establishing its Youth Council to ensure coordination and integration among the Board members, the Mayor and the Council regarding youth activities/functions:

Members serving on the board and on various youth committees throughout the City were asked to indicate their interest in serving on Baltimore City's Youth Council by completing an application; applications were also distributed to a wide range of community organizations, human service agencies and businesses. As members rotate off of the Youth Council new members from the same or similar organizations are recruited for membership.

The Board reviewed the pool of candidates and approved Council membership based on: evidence of past productive participation; bringing access to other youth resources to the system; assuring diversity and adequate representation of constituencies; assuring required partners as referenced in the legislation; assuring employer needs and resources are appropriately represented and assuring youth input.

The Board Chair appointed a chairperson for the Youth Council from the membership.

The proposed Youth Council membership roster was submitted to the Mayor for review and approval; the Mayor met with the Council at its first meeting, empowered them to build Baltimore's youth workforce system and pledged his personal support to the effort. The Mayor continues to support the Youth Council through public appearances and collaboration with other city agencies and the business community.

The Youth Council has identified a long-range goal and several immediate tasks. The Council will address moving these efforts forward in the following manner:

a. Coordinating local youth activities:

As designated by the Mayor, the Youth Council will assume the lead role in promoting the long-range goal of *facilitating the development and implementation of a coordinated and comprehensive youth workforce development system for Baltimore*. The Council utilized a “resource mapping” approach to catalogue the services offered by the many youth serving organizations and human service agencies throughout the City. Building upon the work of our Youth Providers Network and Youth Opportunity System a sub-work group of the Council defined the scope and scale of these existing services and developed a formal plan for engaging these groups in a city-wide youth workforce development effort.

b. Developing portions of the local plan related to eligible youth:

All Youth Council members have been oriented to the Workforce Investment Act legislation and had the opportunity to attend a training session on the regulations relative to the Youth section of the Act. All members are expected to have a thorough understanding of the program elements required by WIA. Council members decide the appropriate service mix of these elements necessary to meet the needs of eligible youth and recommend best use of funds to support and leverage these services.

c. Recommending eligible youth service providers:

A sub-committee of the Youth Council has been formed to identify the criteria to be used in selecting eligible youth service providers. Council members used information from the National Youth Coalition’s PEPNet (Promising and Effective Practices) as well as documents such as the American Youth Policy’s Forum’s “Some Things Do Make A Difference” and the Sar Levitan Youth Policy Network’s “Making Connections”, to help guide their analysis. The subcommittee’s recommendations incorporate selection criteria set by the state and the full council has reviewed and approved the approach. Future vendors will be identified using the above protocols.

A competitive process using a Request for Proposal (RFP) is used to select youth serving organizations to receive WIA youth funding. The Baltimore Workforce Investment Board Youth Council’s Systems Building/Service Provider committee is responsible for the RFP development, dissemination, review and rating makes the and final recommendations for youth service providers. These recommendations are presented to the entire Youth Council for

acceptance. Once accepted, funding level is established and the slate of providers is present to the BWIB for final approval.

The Bidder's conference is advertised in the local paper and posted on the BWIB and MOED website. The RFP is distributed during the bidders conference. The RFP is mailed to all who request it after the Bidders conference and posted as a PDF file on the BWIB and MOED website.

d. Conducting oversight, monitoring and corrective action of the local area's youth programs:

Accountability and performance outcomes are significant aspects of the local youth plan. Youth performance standards are included in all service providers' contracts and the results of quarterly monitoring done by MOED staff and a sub committee of the Youth Council are presented to the full Council for review and discussion. Such monitoring shall be conducted at least quarterly (desk) and annually or once during the term of the agreement if the term is less than a year (on-site). Programs that do not demonstrate positive performance will be provided technical assistance; those that continue to perform below expectations will not be retained.

5. One-Stop System for Service Delivery

In accordance with the Workforce Investment Act, the BWIB and LEO have appointed the Mayor's Office of Employment Development as the One-Stop Operator for Baltimore City. The Baltimore City Comprehensive One-Stop sites are as follows:

a. Comprehensive Physical Sites

Eastside Career Center
3001 E. Madison Street
Baltimore, Maryland 21205
410-396-9035
410-361-9648 (fax)

Southwest Career Center
201 S. Arlington Avenue
Baltimore, Maryland 21223
410-396-3670
410-545-6075 (fax)

Northwest Career Center
Mondawmin Mall
Baltimore, Maryland 21215
410-523-1060
410-523-0970 (fax)

Baltimore Works Career Center
1100 N. Eutaw Street
Baltimore, Maryland 21201
410-767-2148
410-333-7398 (fax)

All sites have been operational since July 1, 2000.

b. Describe any changes in the management, operation, or delivery of services in your One-Stop Centers.

It is our intention to maintain operations at four One Stops strategically located throughout Baltimore City. MOED will continue to oversee day-to-day management of the Eastside, Southwest and Northwest One-Stop Career Centers. The AFL-CIO will continue to be contracted to manage the activities of the Baltimore Works One-Stop Career Center. However, based on final allocations and grant reductions, it may be necessary to decrease or amend the way customers can access training and job placement services. If this should occur, it is our intent to identify liaisons within the community where access to services will be available.

It is our intention to develop a consolidation model for Wagner Peyser and WIA services.

Through joint orientation sessions, outreach and marketing efforts, targeted workshops, integrated staffing, coordinated job development and collaborative management and oversight, the workforce development needs of Baltimore City job seekers and employers will be addressed in a seamless and cost effective manner. Each partner has committed to cross training related to the specific services, eligibility requirements and processes governing their customers and funding streams. The relationships range from permanent staffing to routine workshops, orientations and intake sessions for which customers are scheduled by appointment. The attached Memorandum of Understanding (Attachment 3) depicts the preliminary planning of all required partners. A comprehensive operating plan jointly developed and agreed upon by all partners will be developed.

The type of services will be based on the unique needs of each customer. It may emanate from a customer request, counselor referral or a combination thereof.

Core Services will be delivered in a self-service or facilitated self-service manner primarily using computer technology, literature, videos, group orientations, workshops, job fairs, and special events offered on a regular schedule. All One-Stop partners may deliver some of the Core Services either on-site or remotely. Currently, facilitated or staff assisted Core Services will be delivered by non-WIA funded staff. Appropriate Intensive Services will be delivered in both group and one-on-one sessions by staff trained in the eligibility, assessment and service priorities of the One-Stop operator. Specialists will provide the educational and/or training services authorized under Intensive services. Training services authorized under WIA will be delivered either by the One-Stop operator, partner

organizations, contractual arrangements or through vendors appearing on the approved Eligible Training Provider List (ETPL).

- c. Describe how the needs of dislocated workers, displaced homemakers, low-income individuals such as migrants and seasonal farm workers, public assistance recipients, women, minorities, individuals training for non-traditional employment, veterans and individuals with multiple barriers to employment (including older individuals, people with limited English-speaking ability, and people with disabilities) are being met.**

The needs of dislocated workers, displaced homemakers, low-income individuals such as public assistance recipients, women, minorities, individuals training for non-traditional employment, veterans and individuals with multiple barriers to employment (including ex-offenders, older individuals, people with limited English-speaking ability, and people with disabilities) will be met through the services provided at the One Stops or through referrals to appropriate partners. Through the increased collaboration of each of the One-Stop partners listed in Attachment 1 specialized services and/or resources will be made available to targeted populations in a seamless and more cost-effective manner. Such services may include workshops, basic computer skills, seminars, job matching and placement services designed to meet the needs and unique concerns of dislocated workers, welfare recipients, veterans, ex-offenders, individuals with disabilities, and older workers.

Training may be provided to address the special needs of targeted groups experiencing severe barriers to employment. These targeted groups include ex-offenders, substance abusers, limited English speaking, non-high school/GED graduates, older workers and persons with disabilities.

Limited English speaking customers may be assisted through computer assisted training programs, and contractual arrangements with training providers. The needs of persons with disabilities will be addressed by the One Stop through the cross training of staff on the identification of the various types of disabilities and the specific services available to this population. Additionally, on-site orientation and intake sessions facilitated by trained vocational rehabilitation staff, a Disability Navigator, and special arrangements with training providers will be available to this population. Finally, all customers will be exposed to the benefits and demands of non-traditional employment through career planning sessions, seminars, employer/training provider recruitment forums and online labor market information, posters and brochures.

- d. Describe the role, if any, of local faith or community-based organizations in your workforce development system.**

Faith Based Organizations and community based organizations play a large part in career center activities. Center staff conduct outreach and marketing to community organizations to keep them informed and engaged in center activities. In addition, upon request, the career centers participate in FBO and CBO activities such as job fairs, Career Days, and provide career/job search workshops. One area of increased community and faith-based coordination is in

Baltimore's workforce system's ex-offender re-integration and employment initiative. Dozens of non-profit groups including Catholic Charities, The Job Opportunities Task Force, Goodwill Industries and many faith-based leaders participate in the activities that are a part of this effort. The career centers provide information about employment and training opportunities through our website and through fax for those organizations who do not have access to the internet. The Baltimore Neighborhoods Indicators Alliance (www.bnia.org) is used to obtain updated information on new FBO's and/or CBO's in order to market One Stop services and activities.

It is our intention to provide our customers with direct links to other necessary services that are not provided in the One-Stop. This will enable career centers to expand the provision of existing services through the development of non-financial agreements and through contractual arrangements when funding is available.

- e. **Provide a copy of each Memorandum of Understanding (MOU) between the Board and the One Stop partners at each Center as an attachment to the plan extension. See Attachment 3.**

The One-Stop Partners and representative for each is as follows:

Mandated Partners:

- 1) Programs authorized under Title I of the Workforce Investment Act
Mayor's Office of Employment Development
Karen Sitnick, Director
 - 2) Programs Authorized under Title I -Job Corps
Maryland Job Corps
Adams and Associates, Inc.
Rick Jarvis, Director of Business and Community Relations
 - 3) Wagner-Peyser Act Programs
Department of Labor Licensing and Regulations
Office of Employment Services
Edward G. Pettaway, Labor Exchange Administrator,
Baltimore City
 - 4) Programs authorized under Title I of the Rehabilitation Act of 1973
Division of Rehabilitative Services
J. Michael Breeden, Regional Director
 - 5) Activities authorized under Title V of the Older American's Act of 1965
Baltimore City Commission on Aging
John P. Stewart, Executive Director
- Experience Works,**
Sydell Norris, Director of New Jersey and Maryland Programs

**National Caucus of Black Aging
Deborah Carter, Program Coordinator**

- 6) Post secondary vocational education activities authorized under Carl D. Perkins Vocational and Applied Technology Education Act
**Baltimore City Community College
Dr. Richard M. Turner, President**

**Maryland State Department of Education
Correctional Education Program
Carolyn Buser, Director of Correctional Education**

- 7) Activities authorized under Chapter 2 of Title II of the Trade Act of 1974

**Department of Labor Licensing and Regulation
Office of Employment Services
Edward G. Pettaway, Labor Exchange Administrator,
Baltimore City**

- 8) Veteran's activities authorized under Chapter 41 of Title 38 United States Code

**Department of Labor Licensing and Regulation
Office of Employment Services
Edward G. Pettaway, Labor Exchange Administrator,
Baltimore City**

- 9) Employment and training activities carried out under the Community Services Block Grant Act
**Housing and Community Development
Community Action Centers
Lindbergh Carpenter, Acting Assistant Commissioner**

- 10) Employment and training activities carried out by the Department of Housing and Urban Development
**Housing Authority of Baltimore City
Paul Graziano, Commissioner**

- 11) Programs authorized under State Unemployment compensation laws
**Department of Labor Licensing and Regulation
Office of Employment Services
Edward G. Pettaway, Labor Exchange Administrator,
Baltimore City**

- 12) Programs authorized under Title II of the Workforce Investment Act (adult basic education and literacy training)
**Baltimore City Community College
Dr. Richard M. Turner, President**

6. Services

a. **Adults and Dislocated Workers**

(1) Describe the services provided to adults and dislocated workers in your area.

All core, intensive and training services authorized under the WIA, as well as all partners providing services will be available to adults and dislocated workers through the One-Stop Delivery System. Additionally, strong partnerships exist between the various employment and training programs in Baltimore City that promote access to a wide variety of programs and services in a manner that is seamless to the customer, such as job readiness, basic literacy, computer literacy, financial literacy, transitional employment services, job matching, labor market information, training, and job placement.

MOED, through the ITA vouchering program, is currently doing business with over 25 training providers offering more than 100 courses on behalf of the adult and dislocated worker population.

(2) Describe your supportive service policy for adults and dislocated workers in accordance with the definition at sections 101 (46) and 134 (e) (2) of the WIA Act.

The Mayor's Office of Employment Development's supportive services system is designed to directly assist individuals who are participating in One Stop Center activities (i.e. provide tokens, bus passes to attend GED classes, skills training, job interviews etc.) or link them to resources provided by partner agencies. To maximize resources and avoid duplicating services MOED has developed partnerships with a wide range of agencies and community based organizations to link customers to supportive services such as child care, substance abuse treatment, temporary housing, and emergency food. Paramount to providing intensive employment and training services is the ability to assist customers through referrals to supportive services. Staff regularly mobilize all of their creativity and resources to find solutions for customers facing challenges that may inhibit their ability to obtain and retain employment. Staff is trained to identify and define the problem and develop a customized plan so that customers can get the assistance they need. This plan is then integrated into customer's Individual Employment Plan (IEP). These strategies include:

- **Transportation Assistance:** Recognizing that job obtainment and retention may be inhibited by a lack of transportation, customers may be provided bus passes or tokens to facilitate getting to and from job search activities, (e.g., interviews, job fairs, etc.). Additionally, the Mayor's Office of Employment Development has forged successful relationships with several entities that provide transportation assistance to individuals seeking employment, or those who

have obtained employment that is not easily accessible by public transportation.

- Substance Abuse Intervention: The Mayor's Office of Employment Development has taken a proactive approach to removing the various barriers that face job seekers. To that end, staff have been professionally trained to identify the signs of substance abuse and to make the appropriate referrals on behalf of those customers. Customers returning to the Network Centers following intervention will have an improved chance of successfully completing their job search and/or training plan. Again, the Agency has developed relationships with several organizations to which customers can be referred for treatment.
- Crisis Intervention: Career Development Facilitators (CDF's) at the respective Baltimore Career Center Network locations are trained to conduct a complete assessment of all customers. This includes identifying crises that may affect the participant's ability to be successful in the program. This may include referral to agencies dealing with problems of domestic violence, housing, health, budgeting, and so forth. Regular staff development activities include presentations from professionals knowledgeable in these areas. CDF's use the information imparted from the staff development activities to assist with the identification of potential abusers as well as to make referrals to available services for those in need.
- Resource Guide: A resource guide of governmental agencies, civic groups, and not-for-profit organizations, with resources that cannot be supported under WIA, is utilized and updated annually to provide customers with the solid foundation needed for successful participation in a One Stop activity. All staff have access to the Resource Guide at their desks. The Resource Guide, includes, but is not limited to information on:
 - Budget management and financial counseling
 - Energy assistance
 - Eviction assistance
 - Legal assistance
 - Domestic violence assistance
 - Clothing - The Mayor's Office of Employment Development works with a network of informal partners to provide the appropriate clothing for interviews, job fairs, etc.

(3) Describe your needs-related payment policy for adults and dislocated workers as defined in section 134 (e)

The MOED will not be providing needs based payments with funds provided through this grant.

(4) Describe the Individual Training Account policy used in the local area. See Attachment 7.

The MOED advocates that the process of empowering and assisting customers through a comprehensive assessment of their skills, aptitudes, abilities, and values is paramount to their long term success and is a key to their career planning process. Accordingly, all customers who are in need of training begin the process with assessment, which includes a review of marketable or transferable skills, the determination of basic educational skill levels and the determination of occupational interests and values. The process also includes the identification and implementation of an action plan to remove or stabilize employment and training related barriers.

Customers assessed as needing and having the ability to participate in a strategy to acquire marketable skills to successfully enter or reenter the workforce at sustainable wages are assisted in deciding the appropriate training vehicle by Career Center staff, supplemented by a training strategies workshop.

Current strategies used by MOED include Individual Training Accounts and Customized Training.

Customers choosing and deemed appropriate to access training through the ITA process are referred to the ITA workshop. The ITA workshop provides customers with an in-depth orientation to the ITA process, policies and application requirements. The curriculum also introduces the resources available to them to facilitate their decision making process plan. To reinforce the information provided in the workshop an ITA application packet is provided to each customer. The application process requires customers to justify that their career choice is in an occupation/industry with high growth projections (20% +) using current labor market information, customers thoroughly research the demands, entry requirements, salary potential and certification requirements of their career choice, compare the performance and ancillary services of chosen vendors, conduct interviews with training providers, graduates and persons working in their chosen field, and research job opportunities soliciting persons with the skills they are seeking to obtain.

Completed applications are reviewed with the customer by center staff to ensure completeness and accuracy. The center supervisor also reviews the completed application packet and determines if it will be submitted for approval to the ITA review panel. The ITA review panel includes the ITA Coordinator, Sr. Contract Specialist, and a Career Center Manager / Supervisor. Customers receiving an 80% or above rating are approved for training. A "Welcome to ITA" packet is issued to the customer which

reinforces their responsibility while in training and provides the start date and estimated end date of training. Extensive follow-up is conducted while the customer is in training to ensure that they are progressing and to offer assistance and guidance, as needed. Customers are required to submit attendance and grades to center staff and in concert with center staff develop and participate in a job search plan commencing 30-60 days prior to their estimated training completion date. The BWIB set the current cap for ITA vouchers at \$5,000, allowing for the consideration of exceptions based on an individual's documented need and circumstances that would prevent them from preparing for a high demand occupation. Generally, training should be completed within one year.

Customized Training is an alternative strategy for business to hire skilled workers in hard-to-fill or newly created positions. Training guidelines are as follows:

- Businesses are responsible for a 50% match for each dollar invested in skills training. The match can be made monetarily or with in-kind contributions.
- Businesses agree to hire successful completers into full-time permanent positions with health benefits.
- Businesses agree to pay new employees a competitive hourly rate for their industry sector
- Businesses establish minimum qualifications and screen candidates from an established applicant pool.
- Businesses are fully involved in the interview, selection and training process.
- Proposals are reviewed and approved on a weekly basis.
- Proposals must be approved and a signed agreement in place before applicant recruitment can begin. Typically, the agreement process takes 60-90 days.
- Training occurs in a reasonable timeframe, on average 1-4 months.
- Training cost is not prohibitive, averaging \$500 - \$3,000 per worker.
- Training can be employer-based and/or offered by qualified vendors (e.g., OJT or classroom).

(5) Describe the local priority of service policy developed by the LWIB for providing Intensive and Training Services to Adult Participants under WIA Title I.

Should insufficient funds be available to provide intensive or training services to all eligible customers that meet the criteria for such, priority will be given to public assistance or other low-income individuals. The MOED's priority of service policy will be implemented based on funding obligation or expenditures that fall above our quarterly projections.

In accordance with the Jobs for Veterans Act (PL 107-288), MOED will ensure that eligible veterans are given priority over non-veterans for all available services. Initial assessment and registration documents Veterans status. Veterans advancing to intensive level and training services must document their veteran status by supply a copy of their DD214 or other veterans documentation. Priority of service for veterans as defined in the public law is as follows:

- Veterans must meet the program operator's eligibility requirements before priority is applied.
- Veterans will be afforded priority when they meet program eligibility requirements, and when two or more applicants are of equal status, skill or ability.
- First to be served will be public assistance recipients and low-income individuals who are also veterans.
- Second to be served will be public assistance recipients and low-income non-veterans.
- Among participants who are not public assistance recipients or low-income individuals, veterans will receive priority over non-veterans.

(6) Describe the local policy for defining "self sufficiency" and "inability to retain employment" (663.230).

Self-Sufficiency and Inability To Retain Employment Policy

Definitions of Self Sufficiency:

Employed Adults and Dislocated Workers:

An annual wage greater than or equal to 100% of the Lower Living standard. Employed individuals may qualify for intensive and re-training services if they lack the skills to retain or gain employment at a sustainable wage.

Definition of Unable to Retain

Unable to retain will be determined based on employer or industry indicators that support a decline or elimination of an occupation within the local labor market, industry or worksite. Indicators of individuals who are unable to retain a job may be recurring job terminations.

- (7) Identify the staff contact person (and an alternate) who will work with the State Dislocated Worker Unit to plan and provide Rapid Response services in the local area.

Rapid Response Contact(s):

**Rosalind Howard, Manager of Business Services
Workforce Operations
Mayor's Office of Employment Development
3001 E. Madison Street
Baltimore, Maryland 21205
410-396-9045
rhoward@oedworks.com**

**Rosemary Woren,
Senior Program Development Specialist
Workforce Operations
Mayor's Office of Employment Development
3001 E. Madison Street
Baltimore, Maryland 21205
410-396-9045
rworen@oedworks.com**

b. Youth

- (1) and (2) Comprehensive services to eligible youth including those with special needs or barriers.**

Baltimore's plan to engage eligible youth, including those who are pregnant, in foster care or aging out of foster care, offenders, children of incarcerated parents, homeless youth, parenting or have disabilities, in comprehensive services will include the following:

One Stop Career Centers – Services to youth will be integrated into the universal access service menu of all of our One Stop Centers. One Stop staff are cross trained to provide career counseling and refer youth to a broad range of services for which they meet the eligibility criteria.

Small Schools and School Based Academies - Baltimore has developed a very comprehensive school-to-careers initiative which engages youth, both in school and out of school, in a host of career focused preparation services, work experience, skills training, and academic activities. Working with each of the high schools and their academies as well as with the host of alternative learning centers that are connected through our Youth network, eligible youth will be made aware of all services offered. Though the school-to-work funding has ended, partnerships and work begun under the initiative continues.

Additionally, a wide variety of strategies designed to serve students with special needs are coordinated through the Department of Social Services (DSS) for teen parents, foster care, homeless and runaway youth, programs with DORS/Vocational Rehabilitation and the Baltimore City Public School System (BCPSS) special schools for students with physical and emotional disabilities and projects operated by our community based partners for high school drop outs. There will continue to be close coordination between these programs/services and the efforts of the Youth Council to continue building a comprehensive youth system. The WIA funds will be used to augment, enhance and expand those programs that are demonstrating effective outcomes for eligible youth.

The Youth Council has partnered with over 20 businesses and organizations to develop a Comprehensive Youth and Young Adult resource center to address the needs and barriers faced by homeless and runaway youth. The workgroup intends to have the center located in the northwest section of the city, which also has a high incidence of youth that are HIV positive and/or at risk or contracting HIV.

SAFE - State legislation no longer supports the Maryland's Tomorrow drop out prevention initiative for at risk youth. However, because of the extremely effective strategies and demonstrated successful outcomes of Baltimore's local MT/FUTURES program, it is our intent to continue to coordinate services for this target group of youth with the school system's SAFE project based on funding availability.

WIA Youth Providers

Organizations that are funded through the WIA funds must demonstrate on a quarterly basis that they are meeting the WIA defined performance outcomes. Members of the Youth Council and the fiscal agent conduct monitoring. Each applicant was required to submit a logic model with their application that is used as a measurement tool to gauge progress through the year.

Additionally, the Youth Council has partnered with the Baltimore City Health Department to implement Operation Safe Kids (OSK). OSK is a program specifically for youth offenders. Youth receive a diverse menu of support employment, academic, employment and occupational skills training services.

Youth Providers Network/Youth Serving Organizations - Over the years, Baltimore has developed a very active and broad-based Youth Providers Network (YPN). Its membership includes several hundred youth serving organizations; community based groups, human service agencies and other youth supporting entities. The YPN formed the basis for the Resource Mapping Project that resulted in a Youth Resource Directory. We will use this tool to communicate information about youth services available through our system and to effectively reach eligible youth. Providers will also participate in quarterly seminars and monthly capacity building meetings. The

resource directory will be updated at least once every three years. The last update occurred in 2003.

At least 90% of the youth served in our program fell into one of the target groups.

Coordination with Job Corps and Youth Opportunity Grant:

Baltimore City's Youth Council membership includes a representative from Adams and Associates, the outreach and recruitment arm of the Maryland Job Corps Centers, and both the Youth Opportunity (YO) project manager and a YO Community Advisory Board representative for that grant are Youth Council members. This, along with ongoing communication through the Baltimore Youth Provider Network, will ensure strong coordination will continue among the many youth serving programs in Baltimore. As a required One-Stop Partner, Job Corps will hold regular hours in each One-Stop site to facilitate Job Corps recruitment, intake and placement services.

Assessment of Youth Services:

An assessment of youth services in Baltimore was conducted as part of the community planning process used to develop Baltimore City's 1999 Youth Opportunity grant application to the Department of Labor. Building upon work done by the Safe and Sound campaign, we focused most of the "youth resource mapping" effort on the Empowerment Zone (EZ) as the target area. Significant information was garnered regarding the scope and scale of youth services available to City teens living in the east and west EZ areas. We easily identified the traditional job training services that are available to limited numbers of youth (summer jobs and paid internships, etc.) based on limited federal youth funding.

Additionally, we were able to catalogue the menu of *Career Connections* career awareness, exposure and preparation programs offered to youth. We also found that there are a number of community service/corps such as YouthBuild and Civic Works, several Police Athletic League after school programs, an assortment of entrepreneur activities, job training opportunities for adjudicated youth, a variety of cultural enrichment programs, several types of mentoring, some College Bound support, peer mediation services and a number of alternative/GED options for youth. (Very few services for low-level high school dropouts). However, the arrangement of these youth services was mostly fragmented and not sufficient to meet the needs of all youth.

An initial goal of our Youth Council was to re-visit this information and expand the focus of the assessment beyond the EZ and to recommend a service plan to meet the needs of all City youth.

Program Design

Baltimore's local plan set the vision for providing eligible youth with a comprehensive menu of services to ensure they acquire the academic credentials and the marketable job skills necessary to make the successful transition to adulthood.

As the Youth Council moved forward with its plan to craft a full-scale plan and select youth service providers, it had the benefit of the work that went into and came out of the recent Youth Opportunity application process. A "blue print" was created for building a community anchored youth system which addresses outreach and recruitment, assessment and individualized career planning, referral to services, case management, placement and follow up. A network of "community places/homerooms" augmenting the public schools is recommended as the most effective means of reaching youth to begin the process of engaging them in services. A format was also designed that will continue to guide the Youth Council in its deliberation of selecting the specific services to fall under the WIA's four major categories: Employability Preparation, Improving Educational Achievement, Support for Youth and Leadership Development. The following provides some of the services Baltimore's Youth Council will include in our youth program design:

a) Preparation for post-secondary educational opportunities:

- college counseling, SAT support, college tours,
- Scholarships for high school students
- activities targeting middle school youth in preparation for post secondary experiences

b) Linkages between academic and occupational learning:

- Support to School Based Career Academies
- School led Industry Advisory Boards-curricula validation, teacher externships, student work place exposure
- Exposing out of school youth to alternative learning connected to training in career growth industries such as information technology and computer repair/help desk
- Entrepreneurial training and school based enterprises

c) Preparation for Unsubsidized Employment

- Career Clubs
- Job Shadowing
- WIA Service Providers
- On the Job Training
- Career Mentoring Program

d) Intermediaries & Strong Employer Connections

- BWIB supported private sector summer jobs campaign
- Employer driven customized training opportunities
- Pipelines for job preparation with industry associations

- e) Alternative Secondary Schools**
 - FUTURES drop out intervention program
 - New and expanded school drop out and recapture learning centers
 - Community college GED/high school options

- f) Summer Employment Opportunities**
 - Summer employment opportunities have been incorporated into our year round strategy for preparing youth for careers. Such summer opportunities include:
 - YouthWorks – Private Sector and public funded summer jobs program
 - Industry Boards summer internships with related academies
 - Community based work and learning activities

- g) Paid/Unpaid Work Experience**
 - Internships
 - Part-time Employment
 - Employer Paid internships

- h) Occupational Skill training**
 - Community College High Growth Career Specific Training
 - Call Center Training
 - Computer/Information Technology Career Training

- i) Leadership Development Opportunities**
 - Communications Dynamics Course
 - Community Revitalization Projects
 - Youth City Council

- j) Guidance and Counseling**
 - Career Awareness & Interest/Skills Assessment
 - One Stop Center Career Services
 - Case Management & Career Advocacy

- k) Supportive Services**
 - Mentoring
 - Youth Opportunities Comprehensive Support

- l) Follow Up Services**
 - Career Seminars
 - Career Fairs
 - Job Coaches
 - WIA Services Website
 - Participant Newsletter
 - Extended Tutorial Service (GED)
 - Career Advancement

3) Sixth youth eligibility criteria

The sixth eligibility criteria for youth (Ref: WIA Regulations 664.210) to be used in this jurisdiction is youth who live in a high poverty census area.

4) Justification for additional barrier

Living in a poverty area has a multiplicity of adverse affects on youth. Higher rates of crime, violence, drug traffic, substandard housing and dysfunctional families, conditions standard to high poverty areas, make it more difficult to gain the skills and promote the interest and attitudes needed to succeed in the labor force.

7. Customer Flow System

Describe the customer flow process used in the local area (eligibility determination, assessment, movement through core to intensive to training services, priority of service, individualized training plans, case management and follow-up).

Customer Flow

Services are offered in a manner that result in a greater level of customer choice. To ensure that customers receive the services they need, services are classified into three categories - core, intensive and training services. The Baltimore Career Center Network will utilize the Triage Model of customer flow. The Triage Model ensures that customers are not forced to follow a prescribed set of processes that may not meet their needs. Rather, a Greeter will quickly assess their expressed needs, and the customer will be immediately routed to the appropriate core service.

All customers will be encouraged to attend scheduled information sessions which are designed to orient customers to the full range of services offered by all One Stop Partners. Partner activities are set based on their availability. Customers that are unable to attend such sessions will be provided written materials that describe the center's services and the monthly calendar of center activities. New customers will be required to enroll in the job bank (Maryland Workforce Exchange (MWE) system) prior to accessing other center services. To ensure that customers in need of assistance receive support and guidance, staff will be assigned to each service area of the center on a rotating basis (MWE lab, Plato education lab, Resource Library, Training Lab, Workshop Rooms etc.). Customers will be assisted in determining and accessing their appropriate next step (additional core services, intensive services or training services) by the staff assigned to the individual areas. Customers assessed as meeting the requirements for intensive or training services will be scheduled to meet with appropriate staff. This customer flow model will provide a greater degree of customer choice, ease of access and will result in increased levels of customer satisfaction.

Although all One-Stop staff will be trained to provide core services, assisted core services will be provided primarily by Wagner Peyser and as appropriate, other partners.

Referral Process to Other Agencies

The Mayor's Office of Employment Development will refer applicants to training and educational programs funded by the agency as well as other programs that may be

better suited to their needs. For example, customers seeking employment who have a reading level of 0-6.9 grade, may be referred to one of the many literacy programs, funded by non-WIA sources, available in Baltimore City. Once they complete this service, they will be linked back to the One Stop Career Center to continue their plan of service. In this way, Baltimore City can maximize services available to customers without duplication.

Referrals to the non-One Stop services will be made based on the individual's objective assessment and IEP. If the objective assessment and/or IEP indicates that the referral to non-One Stop services are part of the continuum plan of service for the customer and there is a continuing relationship, the referral will be recorded on the IEP, with appropriate follow-up.

Follow Up Process

Follow-up services will be provided to customers registered in the Maryland Workforce Exchange, and WIA eligible customers that engaged in intensive or training services for a minimum of one year, and for WIA customers who exit the One Stop center services with employment. Such services may include mailers, phone calls, supportive services, recognition events, invitations to job fairs, financial literacy workshops, network clubs, special recruitments and job announcements to support career growth. Every effort will be made to keep customers focused on their career path and support them in the achievement of life long learning and upward mobility.

8. Performance Management

It is expected that tracking and managing customer services will be accomplished through the Maryland Workforce Exchange (MWE) a comprehensive automated Case Management system implemented by the State. The system is capable of tracking all One-Stop job seeker and employer services to include self service, partner services, supportive services, intensive, training services and job referrals in a manner that promotes customer satisfaction and system accountability. Since the MWE system is not able to provide reports for managing performance at this time, Baltimore City has developed and will utilize a separate system for data management and compiling reports.

Weekly performance management is conducted using data from an Ad Hoc database that was developed and uses imported data from the Maryland Workforce Exchange system.

Monitoring of WIA performance will be conducted using the state defined performance goals:

Adult Entered Employment Rate	72%
Adult Employment Retention Rate	82%
Adult Earnings Change	\$3475
Adult Employment and Credential Rate	63%
Dislocated Worker Entered Employment rate	75%
Dislocated Worker Employment Retention Rate	88%
Dislocated Worker Earnings Change	98%
Dislocated Worker Employment and Credential Rate	61%

Older Youth (19-21) Entered Employment Rate	65%
Older Youth Employment Retention Rate	78%
Older Youth Worker Earnings Change	\$2750
Older Youth Employment and Credential Rate	51%
Younger Youth Skill Attainment Rate	75%
Younger Youth Diploma or Equivalent Attainment Rate	57%
Younger Youth Retention Rate	57%
Customer Satisfaction Rate	69
Employer Satisfaction Rate	67

MOED will make every attempt to achieve the federally prescribed performance measures. Specific rates and standards will be negotiated with DLLR annually.

Evaluation process

Evaluation has always been, and will continue to be, an integral part of the Mayor's Office of Employment Development. As a forerunner in the field of workforce development evaluation, MOED has a Program Evaluation department that is responsible for establishing goals and monitoring performance.

The MOED will conduct customer satisfaction surveys of both the Job Seeker as well as Employers. Customer satisfaction data will be compiled and analyzed using statistical software. Ultimately, the results of these analyses will be used to construct meaningful modifications to the delivery system.

In addition to an evaluation of customer satisfaction, the MOED, in conjunction with the BWIB, will establish agency, as well as program level goals and objectives. Important to the design of goals is a deep-rooted commitment to continuous improvement. As an agency, meaningful goals that impact the area's workforce development efforts will be established, and will be based on the local and statewide-unified plans. Special attention will be paid to the federal and state required performance measures. Each program's goals will be designed to assist in the achievement of the overarching goals.

Performance will be calculated and analyzed on an ongoing basis. Analysis will include (but not be limited to) service sectors and penetration, performance standard indicators, cost effectiveness, labor market analysis and outcomes by program, service strategy, and customer characteristics.

Evaluation efforts require that data be collected from many different sources. Customer activity will be tracked utilizing a statewide case management system. An analysis of services and outcomes will provide the opportunity for continuous improvement of the one stop system. Customer information will be obtained directly

at the point of service. Fiscal activity will be tracked utilizing a tracking system that interfaces with the Baltimore City fiscal system.

9. Sunshine Provision

Availability of the draft Baltimore City Workforce Investment Act Five year plan extension and notice of a public meeting was published in four local newspapers during the week of March 14th, 2005. A Public Hearing was held on March 24th, 2005 to discuss the plan and to enlist input from the public, and was followed by a thirty (30) day comment period beginning March 24th and ending April 25th, 2005. Comments from all interested parties were included in the final plan. The entire plan is posted on the following website: www.oedworks.com .

IV. Administrative Provisions

No changes have occurred or are planned for the next two years in the way eligibility is determined. The WIA defined standards continue to be followed.

A. PARTICIPANT ELIGIBILITY PROCESS

Youth Eligibility

“Eligible Youth” is defined as an individual who—

1. is not less than age fourteen (14) and not more than age twenty-one (21);
2. is a low income individual; and
3. is an individual who meets one (1) or more of the following:
 - (a) Deficient in basic literacy skills
 - (1.) Reading or Math score less than 8.9 on any standardized test
 - (2.) Unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the family, or in society
 - (b.) A school dropout
 - (c.) Homeless, a runaway, or a foster child
 - (d.) Pregnant or a parent
 - (e.) An offender
 - (f.) An individual who requires additional assistance to complete an educational program, or to secure and maintain employment.

The term “low-income individual” refers to an individual who received an income, or is a member of a family that received a total family income, for the six (6) month period prior to application for the program involved (exclusive of summer wages, payment made in employment and training programs, work study programs, unemployment compensation, child support payments, and old-age and survivors insurance benefits received under section 202 of the Social Security Act (42 U.S.C. 402, SSI insurance payment [accidents, death]) that, in relation to family size, does not exceed the higher of:

- (i) the poverty line, for an equivalent period; or
- (ii) 70 percent of the lower living standard income level, for an equivalent period;

OR

in cases permitted by regulations promulgated by the Secretary of Labor, is an individual with a disability whose own income meets the requirements. A youth with a documented disability will be considered a family of one and have their income eligibility determined based on their own income (excluding the family total income).

In addition, WIA allows up to five percent (5%) of a local program's youth participants to come from individuals who do not meet the minimum income criteria to be considered eligible youth, if such individuals are within one (1) or more of the following categories:

- (1) individuals who are school dropouts;
- (2) individuals who are basic skills deficient;
- (3) individuals with educational attainment that is one (1) or more grade levels below the grade level appropriate to the age of the individuals;
- (4) individuals who are pregnant or parenting;
- (5) individuals with disabilities, including learning disabilities;
- (6) individuals who are homeless or runaway youth,
- (7) individuals who are offenders, or
- (8) other eligible youth who face serious barriers to employment as identified by the local board.

WIA requires that at least thirty percent (30%) of youth expenditures be spent on services to Out-of-School Youth. Eligibility as an Out-of-School Youth is defined as individuals that are school dropouts, have graduated high school, or obtained a GED; and are basic skills deficient; and are underemployed or unemployed.

WIA defines Youth as individuals fourteen (14) through twenty-one (21) years of age and Adults as individuals ages eighteen (18) and older. Within both groups there is a program eligibility age overlap for individuals eighteen (18) through twenty-one (21). WIA allows concurrent enrollment for individuals within the eighteen (18) through twenty-one (21) age group; they may receive services from, and be registered in both the Youth and Adult programs.

Adult Eligibility

To be eligible as an Adult or Dislocated Worker, a customer must be at least eighteen (18) years of age.

Under WIA, for Adults and Dislocated Workers, Core Services are seen as universally accessible through the One-Stop Delivery System. Primarily, Core Services are informational and self-directed through the One-Stop System. Adults receiving Core Services are not required to provide any documentation of WIA eligibility criteria.

Individual Adults and Dislocated Workers who have made use of at least one (1) Core Service, and have demonstrated a need for a more in-depth level of assistance, may qualify for Intensive Services. Similarly, individual Adults and Dislocated Workers who have made use of at least one (1) Intensive Service and have demonstrated a need for more in-depth level of assistance may qualify for Training Services. Additionally, when funding is limited, the local “priority of service” policy will be implemented for Adults and Dislocated Workers.

Dislocated Worker Eligibility

Dislocated Workers are individuals who:

1. Are unemployed and have been terminated or laid off from employment, or currently possess a notice of impending termination or layoff from employment; **or**

Have obtained interim employment and have been terminated or laid off from employment, shall still be considered to meet this definition when the individual’s current weekly wage does not exceed seventy five percent (75%) of his/her weekly wage at the time of termination;
and

- (a) Are eligible for, or have exhausted, unemployment compensation benefits in connection with or as a result of the layoff/termination; **or**
- (b) Have been employed, but is not eligible for Unemployment Compensation due to insufficient earnings; **or**
- (c) Performed services for an employer that were not covered under a state unemployment compensation law;
and

Are unlikely to return to the industry or occupation from which they were (will be) laid off/terminated.

OR

2. Must have been terminated or laid off during the past three (3) years, or are employed and possess a notice of termination/ layoff as a result of any permanent closure of or any substantial layoff at a plant, facility, or enterprise.
 - (a) Have obtained interim employment and have been terminated or laid off from employment due to plant closure, shall still be considered to meet this definition when the individual’s current weekly wage does not exceed seventy five percent (75%) of his/her weekly wage at the time of termination.

(b) The term “substantial lay off” means any reduction-in-force which is not the result of a plant closing and which results in an employment loss at a single site of employment during any thirty (30) day period of:

(1) At least thirty three percent (33%) of the employees (excluding employees regularly working less than twenty (20) hours per week); **and** at least fifty (50) employees (excluding employees regularly working less than twenty (20) hours per week); **or**

(2) At least five hundred (500) employees (excluding employees regularly working less than twenty (20) hours per week).

OR

3. Were self-employed (including farmers and ranchers) and are currently unemployed as a result of general economic conditions in the community where they reside or because of nature disasters, subject to regulations prescribed by the Secretary of Labor.

(a) Categories of general economic conditions include, but are not limited to:

(1) Failure of one (1) or more businesses to which the self-employed individual supplied a substantial proportion of products or services;

(2) Failure of one (1) of more businesses from which the self-employed individual obtained a substantial proportion of products or services;

(3) Substantial layoff(s) from, or permanent closure(s) of, one (1) or more plants or facilities that support a significant portion of the state or local economy.

Categories of natural disasters include, but may not be limited to, any hurricane, tornado, storm, flood, high water, wind-driven water, tidal wave, tsunami, earthquake, volcanic eruption, landslide, mud slide, snow storm, drought, fire, explosion, or other catastrophe.

OR

4. Is a displaced homemaker defined as:

(a) one who was providing unpaid services to family members in the home and who has been dependent on the income of another family member **AND**

- (b) is unemployed or underemployed, and is experiencing difficulty in obtaining or upgrading employment.

B. OVERSIGHT AND MONITORING

1. The financial activities of subrecipients are monitored, continuously, throughout the life of contractual agreements, principally through the processing of invoices submitted (generally monthly) for payment. Invoices must be accompanied by adequate documentation to support the reasonableness, appropriateness and legitimacy of the indicated costs/charges. The review and processing of invoices is viewed as a Desk Monitoring procedure. During this Desk Monitoring process we are also looking to test that participants served during the period were truly eligible for service under the applicable funding stream. We also do an on-site review of subrecipients' records and activities at least once during the year..
2. To insure that expenditures are made against the cost categories and within the cost limitations specified in the Act and WIA regulations, detailed budgets and budget controls are put in place for WIA activities, including those of subrecipients, before expenditures are made. During the budget review and approval processes, WIA regulations, including restrictions, are taken into consider. The approved budgets function as a major control tool during the procurement and expenditure request and approval cycles.
3. MOED has and will continue to incorporate various procedures and tools into its processes to insure that subrecipients are in compliance with other provisions of the Act and regulations and other applicable laws and regulations. Those procedures and tools include, but are not limited to: all contract documents being reviewed and approved by the city's law department and Board of Estimates before ratifying; requiring audited financial statements from subrecipients, if applicable; insuring that subrecipients are in good standing with the state's Tax Assessment office; etc.
4. Any questionable procedures and/or costs identified during the Desk or On-Site Monitoring processes are communicated to the subrecipient in writing and in a timely manner. The subrecipients are given an opportunity to address and discuss the issues before a final determination of allowance or rejection is issued by MOED, in writing. The subrecipient is subsequently required to submit a detailed Plan of Corrective Action, including repayment plans if applicable, of which the detailed actions are subject to monitoring by MOED.
5. When requested or when MOED deems it necessary and/or prudent, MOED provides technical assistance to ensure that the subrecipient/contractor consistently complies with the terms and conditions of the contract, the Act and WIA regulations.

6. MOED and the with its BWIB, will use various evaluation methods to oversee the One-Stop system, youth activities and employment and training activities. Employer satisfaction data will be compiled and analyzed by MOED using statistical software to measure employer satisfaction of the One-Stop system. Customer satisfaction data will also be collected by MOED to correlate the relationship between the services offered by the One-Stop system and the customer. In addition, the MOED, in conjunction with the BWIB, will establish agency, as well as program level goals and objectives. Performance will be calculated and analyzed on an ongoing basis by MOED's Evaluation Department. Analysis will include, but not be limited to, performance standard indicators, cost effectiveness, labor market analysis and outcomes by programs, service strategy, and customer characteristics. The BWIB's Workforce Effectiveness Committee (WSEC) will provide support to MOED's efforts towards continuous improvement by conducting research studies such as the state of Baltimore's workforce, comparisons to other similar local areas, and other pertinent workforce issues. Additionally the Youth Council, with the assistance of MOED will conduct quarterly monitoring visits of all youth providers evaluating contractual and WIA performance.

C. GRIEVANCE PROCEDURES/COMPLAINT PROCESSING PROCEDURES

1. This grievance procedure is concerned with the protection of the rights, privileges and prerogatives of WIA program participants/employees/subrecipients and other interested parties affected by the local workforce investment system, including one-stop partners and service providers for the purpose of receiving and resolving complaints raised in connection with WIA programs operated by MOED and its subrecipients. The Mayor's Office of Employment Development (MOED) has established procedures for resolving disagreements among the parties to any grievance in compliance with Section 181 of the Workforce Investment Act (WIA).

There shall be no reprisals against a WIA program participant/ employee/subrecipient for instituting or pursuing the resolution of a grievance. In instituting or pursuing the resolution of a grievance, program participants/MOED employees/subrecipients and their selected representatives shall be unimpeded and entirely free from interference, discrimination, or coercion.

Employers, including private-for-profit employers of participants under the Act, are required to have a Grievance Procedure as a condition of participating in programs for the training or hiring of participants under the Act. Employers may operate their own complaint system or may utilize the complaint system established by the Mayor's Office of Employment Development (Attachment 6). Employers must inform participants and their employees of the complaint procedure they are to follow when the participant/employee begins employment.

An employer's complaint system shall provide for, upon request by the complainant, a review of an employer's decision by the MOED and the state if necessary, in accordance with 667.000 of the regulations.

- a. Complaints alleging discrimination on the basis of race, sex, religion, color, national origin, age, political affiliation or belief, and for beneficiaries only, participation in programs funded under the WIA in admission or access to, opportunity or treatment in, or employment in the administration of or in conjunction with, any WIA funded program or activity, may file a complaint, either by him/herself or through a representative, within one hundred eighty (180) days from the date of the alleged violation with the MOED's equal opportunity officer. If such a complaint is received, MOED, will immediately notify DLLR and the directorate of Civil Rights, Washington, D.C. of the existence of the complaint. A complaint may be filed directly with the Directorate of Civil Rights (DCR), U.S. Department of Labor, 200 Constitution Avenue, N.W., Room N-4123, Washington, DC 20210. If the complainant elects to file his/her complaint with the MOED, the complainant must wait until the MOED issues a decision or until ninety (90) days have passed, whichever is sooner, before filing with DCR. If the MOED has not provided the complainant with a written decision within ninety (90) days of the filing of the complaint, the complainant need not wait for a decision to be issued, but may file a complaint with DCR within thirty (30) days of the expiration of the sixty (60) day period. If the complainant is dissatisfied with the MOED's resolution of the complaint, the complainant may file a complaint with DCR. Such complaint must be filed within thirty (30) days of the date the complainant received notice of the MOED's proposed resolution.

Disabilities Discrimination: Persons with this type of discrimination complaint must first utilize or exhaust the grievance procedure of MOED before a complaint may be filed with the Directorate of Civil Rights, Washington, D.C. If such a complaint is received, MOED, will immediately notify DLLR of the existence and nature of the complaint using the Notification of Receipt of WIA Complaint Alleging Discrimination form. Complaints must be filed within one hundred eighty (180) days from the date of the alleged discrimination. Filing with the Directorate of Civil Rights must occur in writing within thirty (30) days of the MOED decision or ninety (90) days from the date of the original filing, whichever is earlier, if the complaint has not been satisfactorily resolved at the local level within sixty (60) days of the filing date regardless of whether the local procedures has been exhausted.

- b. Complaints and Grievances not alleging illegal discrimination will have resolution attempted by exhausting this grievance procedure. If resolution is not achieved, complainants may request a DLLR review of findings by filing a request with DLLR after receiving MOED's decision that resulted from the hearing of the complaint. Complaints must be filed within one (1) year of the event(s) on which the complaint is based except in the case of complaints alleging fraud or criminal activity. DLLR will render a decision on the grantee's written decision within ninety (90) days of the original complaint date.

Complaints by regular employees or their representatives that allege any labor standards violations have the opportunity for an informal resolution of the complaint. If not resolved informally, a hearing will be held in accordance with this grievance procedure. The procedure must take no longer than sixty (60) days from the date of filing to be exhausted which includes time spent informally attempting to resolve the complaint. The complainant has the right to have the decision reviewed by DLLR. The complaint must be filed within one (1) year of the alleged occurrence.

2. The grievance should be presented by the WIA program participant/subrecipient or other interested parties using the MOED grievance form. The aggrieved should present in writing and discuss the matter with his/her immediate supervisor within five (5) calendar days from the date of the event, or of his/her knowledge thereof, which is the basis of the grievance. The immediate supervisor will attempt to adjust the grievance within five (5) calendar days from when the grievance was presented. If not resolved to the satisfaction of all parties the grievance may be appealed to the Department Head within five (5) days after a response is given by the immediate supervisor. This appeal must be in writing and should be forwarded to the WIA program participant's/employee's/subrecipient's immediate supervisor. The immediate supervisor will, upon receipt, forward the appeal to the Department Head along with a copy of his/her response to the grievant. The Department Head is allowed five (5) calendar days beginning with the day on which the written appeal is received for settlement.

If the matter is not satisfactorily resolved, the Second Step, the grievant may appeal the decision to the appropriate EEO Officer of MOED and request an information hearing on the matter. The appeal of the decision and request for a hearing must be submitted in writing to the EEO Officer of MOED by the grievant within five (5) calendar days after a decision is rendered.

Upon receiving an appeal and request for a hearing, the EEO Officer shall appoint an impartial hearing officer to hear the complaint. Hearings shall be conducted within ten (10) days of filing a grievance

at the Third Level (within thirty (30) days of the date on which the grievance was filed with the MOED). Written notice shall be given to the complainant of the date, time, place of the hearing, the manner in which the hearing will be conducted and the issue to be decided. Written notice to other interested or affected parties and the method by which they may request to participate shall also be given when necessary.

Within five (5) days after the informal hearing, a written notice of the decision of the hearing officer shall be provided to the grievant, his/her representatives, and all other interested parties.

The written decision, including a synopsis of the facts, a statement of reasons for the decision and a statement of remedies, if applicable, will be sent to each interested party.

The entire hearing shall be recorded, and this recording shall become a part of the permanent record of the proceedings. The grievant may request a copy or transcription of this recording at his/her own expense.

If the grievant is not satisfied with the Hearing Officer's decision, he/she may appeal the decision to the Director of the Mayor's Office of Employment Development within five (5) days. The Director or her designee shall review all materials introduced and review the recording of the hearing. Within five (5) days of the Director's review, a written notice of the decision of the Director shall be provided to the grievant, his/her representative, and all other interested parties. If the grievant is not satisfied with the Director or his/her designee's decision, the grievant may appeal the decision reached to the Department of Labor, Licensing and Regulation. The appeal must be submitted in writing after receipt of the decision from the Mayor's Office of Employment Development. (Note: 10 days is not a standard used for receiving, but for determining the matter once received.)

Where a decision is made that there is probable cause to believe that an alleged act of discrimination has occurred, the Equal Opportunity Officer, the Manager for Monitoring & Compliance, a Contract Specialist and the appropriate program administrator shall determine and recommend appropriate remedies to correct the violations found and prevent recurrence of those violations.

Remedies shall be tailored to the specific circumstances and violations and may include:

- a. provision of service, benefit or employment opportunity denied
- b. monetary payment for loss of employment opportunity or benefit
- c. disciplinary action(s) against the individual(s) found to have

discriminated

- d. training for individual(s) found to have discriminated and for other appropriate individuals
- e. nullification of an adverse action
- f. removal of adverse records or documents from client/personnel files, and
- g. preparation of statement of no retaliation

Should the proposed remedies be acceptable to all parties, if appropriate, the EO Officer shall prepare a written Settlement Agreement which contains the specified remedies and which the complainant and respondent will sign.

The Agreement shall include a stated time frame for implementation of the remedies.

Should the complainant or respondent be dissatisfied with the recommended remedies and no solution appears probable, the Equal Opportunity Officer shall inform the complainant of additional filing rights and time frames for filing as appropriate.

Where the Equal Opportunity Officer makes a decision that there is no probable cause to believe that an alleged act of discrimination has occurred, the individual assigned the complaint shall notify the complainant and the respondent.

Where the complainant does not accept the decision of no probable cause, the Equal Opportunity Officer shall inform the complainant of additional filing rights and time frames for filing as appropriate.

D. NONDISCRIMINATION AND EQUAL OPPORTUNITY PROVISIONS

1. Reasonable Accommodation

In serving persons with disabilities, the MOED will make every effort to provide reasonable accommodations to allow for full program participation including, but not limited to, providing auxiliary aids and services and ensuring effective communications through alternative formats.

2. Communication - Individuals with Disabilities

The MOED will take reasonable steps to provide auxiliary aids and materials to ensure that communications with individuals with disabilities, including individuals with visual or hearing impairments are assisted. Examples include but are not limited to: large print, Braille, interpreting services, allowing people with visual or learning disabilities

or who have limited use of their hands access to tape recorders or a computer.

3. **Notice and Communication – Languages Other Than English**
For individuals having limited English, particularly members of the Spanish-speaking population, MOED will provide written materials in Spanish.
4. With regard to nondiscrimination and equal opportunity in WIA Title I financially assisted program, the MOED will comply with WIA Sec. 188 and 29 CFR Part 37.

E. PROCUREMENT AND CONTRACTING PROCEDURES

1. The MOED will conduct procurement activities in a manner which provides for full and open competition for goods and services. Where possible, the MOED will access the contracts developed by the Baltimore City Bureau of Purchases for goods/services which have been competitively procured.

As for goods and services which are not available from the Bureau of Purchases, the MOED has developed a written procurement manual, which details how procurement of goods and services are to be made. Small procurements (defined as less than \$5,000) require at least three (3) price quotes be obtained in order to perform a cost or cost/price analysis.

Larger acquisitions are procured directly by the city's Bureau of Purchases often via a Request for Proposals (RFP) process.

On occasion, based upon the goods/services being sought by the MOED, the Bureau of Purchases will allow the MOED to initiate the competitive procurement process where the uniqueness or technical aspects of the goods/services needed are better known by the MOED.

2. **Contracting procedures (Contracting for Core, Intensive and Training Services)**

- a. The BWIB will place in the legal section of periodicals (i.e., The Sun) a Request for Proposal (RFP) seeking potential providers of services. Proposal packages will be issued to parties responding to the RFP.

Upon return of the RFP, the MOED will review the proposal (i.e., demonstrated performance, cost or cost/unit analysis) and forward its findings and recommendations authorized approving body.

The MOED will also utilize the list of training providers that have been recommended to and approved by the Maryland

Department of Labor, Licensing and Regulation's Training Providers System. The MOED will also adhere to the parameters delineated in the Workforce Investment Field Instruction (WIFI) No. 11-99: Training Providers System.

Furthermore, the MOED shall comply with procedures to conform to the standards contained in the United States Department of Labor Regulations 29 CFR Part 97 – Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments.

- b. The MOED shall adhere to the acquisition, management and disposition of property per Property Management Procedures as prescribed in the United States Department of Labor Regulations 29 CFR Part 97 and 29 CFR Part 95.
- c. The BWIB has prepared and implemented its Conflict of Interest policy (Attachment 4) signed by each BWIB member. This policy addresses conflict of interests including matters related to the awarding of contracts.

F. FISCAL CONTROLS

- 1. The MOED will utilize the Baltimore City Integrated Financial System (IFS) as the main source for financial tracking and accounting record keeping. The Baltimore City Integrated Financial System is operated in accordance with Generally Accepted Accounting Principles (GAAP).

Due to WIA reporting requirements, the MOED has implemented a customized version on Kintera Fundware which compliments the Baltimore City Integrated Financial System.

- a. The IFS and Fundware systems enable MOED to track:
 - (1) Obligation/Encumbrances
 - (2) Expenditures
 - (3) Assets
 - b. The fiscal systems also permit tracking of:
 - Program income
 - Stand-in costs
 - Excess revenues and/or expenses
 - c. These systems enable the MOED to prepare the financial reports required of the state for WIA reporting.
- 2. MOED's fiscal administration and contracting units are the primary units responsible for financial recording and reporting.

3. Both the Integrated Financial System (IFS) and the MOED's Fundware system are designed so that costs incurred are reported against the cost categories established by the MOED. Each funded activity requires an expenditures budget. Prior to the expenditure occurring, the budgeted amount requested is placed into the appropriate cost category (administration or training). Monitoring of financial documents and records by the appropriate MOED staff ensures that the correct cost category is being charged and that costs associated with the program are proper and allowable under WIA regulations.

4. a. Fiscal Reporting System

The monthly receipts and expenditures reports are generated by the Baltimore City Accounting Operations Division. Interfacing these reports with the internal financial management information system, accruals are recorded. The internal Fundware accounting system is a reference for reporting expenditures to the DLLR.

- b. Obligation Control System

The MOED initiates a planning cycle prior to the beginning of the program year to determine funding strategies for each of its grants. This planning process allows for control of the total obligation level of each funding source. After planning targets are identified and subsequent programs are put in place, MOED staff monitors the obligation and anticipated expenditure levels of each of its programs and grants to ensure that costs will not exceed the available funding limits. A variety of review mechanisms are in place to monitor and control the level of obligations and subsequent expenditures.

- c. As planned, ITA payments will be made via the execution of Direct Payment Orders (DPO's) upon submission of a legitimate invoice submitted by the training vendor. An MOED staff member will verify the payment to be made via the terms and conditions of the contract and forward to MOED's Accounts Payable department for processing. NOTE: City requirements do not allow for MOED to issue checks for payment. As such, the DPO will be prepared by the MOED and forwarded to the City's Disbursements Department for payment to the vendor.

- d. To track revenues and expenses for each grant fund, each grant is assigned a separate and discrete fund number. At the expenditure level, Fundware currently utilizes a 15-digit budget account number structure. The budget account number structure is maintained in a formal Chart of Accounts.

15-Digit Chart of Accounts Definition

<u>XXXX</u>	<u>XXX</u>	<u>XXX</u>	<u>XX</u>	<u>XXX</u>
Grant	Title	Program Activity	Cost Category	Object Sub- Object

Grant: Represents the source of WIA funding (Adult, Youth, and Dislocated Worker)

Title: Denotes the source of funds for the grant (i.e., State, Local, Federal, Other)

Program Activity: Represents the budget cost centers.

Cost Category: Denotes whether the cost associated with the activity relates to Administration or Program.

Object/Sub-Object: Denotes the classification of costs (i.e., wages, fringe costs, and payment to contractor, materials and supplies).

e. Accounts Payable System

Within the MOED's infrastructure, a series of checks and balances are used to insure the accuracy and timeliness of the accounting for revenues and expenditures. Upon receipt of an invoice for payment, this document is reviewed and must be approved at two separate and independent levels before it is submitted to the City's Department of Finance for payment processing.

The Fiscal Division of the MOED maintains the chart of accounts (adds, deletes, etc.) and coordinates with the City's Accounting and Finance Divisions. Accounting entries for both contracted and non-contracted expenditures are reviewed for fiscal accuracy and correct cost categories prior to assigning charges. In the event of human or mechanical errors, the account incorrectly charged is corrected.

f. Staff Payroll System

The staff payroll system is a part of the Baltimore City Payroll System and requires time and attendance reports to be submitted every other week. Time and attendance reports must be signed by both the staff person and his/her supervisor. The City Payroll Department processes all payrolls and maintains all backup documents. Entry and change tickets are submitted by the MOED's Personnel Department for new employees, staff transfers terminations and salary increases. The MOED Personnel Department monitors all changes, and in event of errors, initiates the appropriate changes.

g. Participant Payroll & Stipend Payment System

The participant payroll and stipend systems follows the same procedures as the staff payroll system, except the payroll changes and processing are under the control of the appropriate program payroll units. The time and attendance reports are signed by both the participant and the program operator.

5. The MOED assures that all financial transactions will be conducted and its records maintained in accordance with General Accepted Accounting Principles (GAAP).
6. Grant funds awarded are generally received via Cash Draw down requisitions submitted to DLLR by the BWIB/Fiscal Agent. The revenues received from DLLR are identified using a unique 15-digit account coding structure to ensure appropriate accounting of the various funding sources. Utilizing the City's Accounting and Finance structure, deposit slips are prepared denoting appropriate amounts and accounts, and forwarded to the City's Finance Office.

All check receipts are deposited daily in revenue accounts established with the Baltimore City Department of Treasury. On a monthly basis the grant revenue ledger accounts are reconciled with the deposit slips. NOTE: All Grant cash draw down requisitions submitted to DLLR are based on actual and accrued expenditures which minimizes or eliminates excess cash on hand.

Reimbursement (via grant funds) of expenditures by service providers is preceded by an invoice requesting payment. Invoices are accompanied by back-up documentation that is retained by MOED monitoring staff. Once the controls identified, including verification/validation processes, are met, the invoice is approved for payment and submitted for processing. The City's Department of Finance, Disbursement Division, processes and disburses payment for the approved amount and forwards payment directly to the service provider.

7. Cost Allocation Plan

The MOED charges actual and estimated (budgeted) expenses to the benefiting program/funding source. Expenses benefiting a single program/funding source are directly charged while those benefiting multiple programs/funding sources are "pooled" for later pro rata allocation between the multiple programs/funding sources based on logical criterion. The basis for allocation could include, but are not limited to: number of unduplicated users; square footage of space occupied; percentage of direct personnel costs of one program to total direct personnel costs of all programs; etc.

Pooled costs are classified as Administrative Costs (ACP) or Program Costs (PCP). Additional cost pool classifications may be developed in the future. Costs that are directly charged are also categorized as Administrative or

Program (training costs) based on guidelines established by each funding source. The Cost Allocation Plan and its related distribution methodologies will be reviewed and re-evaluated periodically with modifications being made where warranted. The MOED reserves the right to include/exclude new funding sources that are received during the year.

MOED will share allocated One-Stop Career Center costs with required partner agencies via negotiated and equitable resource sharing agreements with each. Each partner will be required to contribute a fair share of the operating costs of the One-Stop system.

8. All governmental and non-profit organizations must follow the audit requirements of the Office of Management and Budget (OMB) Circular A-133. An annual financial and compliance audit will be conducted and resulting auditor's report submitted to the Department of Labor, Licensing and Regulation/Office of Employment Training within thirty (30) days after issuance of the audit report, but no later than nine (9) months after the end of the audit period. Furthermore, the BWIB or fiscal agent insures that all required subrecipient audits and all subrecipient audit resolution procedures are completed.

9. The BWIB/Fiscal Agent will have the lead responsibility for the resolution of any and all debts pertaining to WIA funds awarded to subrecipients that operate a program. Usually a debt is identified at the point where an audit of the program has identified questioned or disallowed costs. The resolutions to the finding(s) are:
 - a) The subrecipient is given no more than thirty (30) days to either accept the finding(s) and acknowledge the debt or provide additional documentation not reviewed during the audit which documents the allowability of the costs questioned. NOTE: Disallowed costs are automatic debt payments due to the BWIB.
 - b) If documentation is received, the BWIB/Fiscal Agent and the auditors will review and either accept or reject the documentation. This review shall conclude not more than thirty (30) days upon receipt of the documentation.
 - c) Should the original finding(s) stand, the BWIB/Fiscal Agent will notify the subrecipient in writing of its findings and prepare a repayment schedule to recover all funds due. The repayment of funds shall not exceed six (6) months from the date of notification from the BWIB/Fiscal Agent.

10. In the event the subrecipient fails to pay, the following one or more of the following steps will be initiated:
 - (a.) In the event the BWIB has a current agreement with the subrecipient, the invoices submitted for payment will not be paid until such time the subrecipient pays the debt in full.

- (b) In the event the BWIB has a current agreement with the subrecipient, the agreement will be suspended until the debt is paid in full. If not paid, the agreement will be terminated.
- (c) The City of Baltimore Law Department be notified to initiate legal actions to recover the debt.
- (d) The Baltimore City Department of Finance be notified to place a lien on any funds the subrecipient may be receiving from the City.

G. Local Workforce Investment Board (LWIB) – Chief Local Elected Official (CLEO) Working Agreement
See Attachment 5.

H. RESPONSIBILITIES OF THE ONE-STOP SERVICE DELIVERY SYSTEM

Describe the process to be used by the LWIB to meet its responsibilities related to One-Stop operations as outlined in WIFI No. 7-99.

Responsibilities of the Local Workforce Investment Boards for the One-Stop Service Delivery System

1. In accordance with State and Federal guidelines, the Mayor and the BWIB have appointed The Mayor’s Office of Employment Development as the Operator for Baltimore City.
2. The role of the One-Stop Operator is described in Attachment 2, BWIB/Operator Agreement and Attachment 3, One Stop Memorandum of Understanding.
3. The ongoing BWIB planning process will be the platform that defines the number and type of centers required to best service the workforce development needs of Baltimore City. Additional or subsequent appointments of One-Stop managers will be accomplished through the competitive process.
4. Each year the BWIB, through its committee structure, will provide guidance necessary to meet the minimum requirements for each center,
5. On behalf of the BWIB, MOED sets performance including customer satisfaction measures for each one-stop center. The BWIB may select additional performance measures as deemed appropriate by the Executive Committee.
6. The BWIB has adopted workforce goals as a “call to action”. It recognizes the value of setting objectives and milestones and reporting quarterly on movement towards achieving goals.
7. MOED negotiates Memoranda of Understanding (MOUs) with all mandatory partners on behalf of the BWIB Executive Committee.

I. Continuous Improvement/Consumer Report

The Baltimore City One Stop System embraces the concept of a market driven eligible provider system with a customer driven consumer reports system. The Maryland Higher Education Commission (MHEC) oversees the State's Eligible List of Training Providers and reports on program enrollments and performance outcomes for all training providers listed. Customers will be educated with consumer reports provided by MHEC including timely accurate information on training provider curricula, support systems, outcomes and employment potential. Career decisions will be based on labor market information that includes employment trends, and selections will be made in high growth industries with career path opportunities. To remain competitive in such an environment, training providers must design programs that are responsive to employer, worker and job seeker needs. MHEC will monitor provider's performance on an ongoing basis and poor performers shall be deleted from the list of eligible providers. Training providers shall be made aware of the new requirements by MHEC prior to participating as an eligible provider. Technical assistance, as it relates to improving program outcomes, may be made available to eligible providers through the One Stop Operator.