

MASSACHUSETTS

# Workforce Investment Act

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**WIA Communication No. 05-27**

**Policy**    **Information**

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**To:** Chief Elected Officials  
Workforce Investment Board Chairs  
Workforce Investment Board Directors  
Title I Administrators  
Career Center Directors  
Title I Fiscal Officers  
DCS Regional Directors for Workforce Integration  
DCS Associate Directors  
DCS Field Managers

**cc:** WIA State Partners

**From:** Susan V. Lawler, Commissioner  
Division of Career Services

**Date:** April 27, 2005

**Subject:** **Fiscal Year 2006 Local Annual Workforce Development Business Plan Guidance**

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**Purpose:** To provide instruction to the Local Workforce Investment Boards (LWIBs) regarding the development and submission of the FY 2006 Annual Workforce Development Business Plan.

**Background:** As was the case for the FY 2005 planning cycle, the FY 2006 Local Annual Workforce Development Business Plan Guidance was developed in light of the absence of Congressional reauthorization of the Workforce Investment Act (WIA). However, unlike the previous year, this year's local planning guidance must be consistent with the development of a required two-year State plan. As a result, the Division of Career Services (DCS) has structured the planning guidance to reflect the continued federal direction toward streamlined service delivery, a new federal vision for the provision of youth services geared toward out-of-school youth and increasing local accountability. The Commonwealth has incorporated these strategic priorities in the State Plan and has established three additional priorities to enhance the capacity of local workforce systems to respond to labor market demand. These include flexible state funding for One-Stop Career Centers, training funds for industry-driven training models and funding for at-risk, out-of school youth.

The underlying basis for this year's local planning process is to build on the efforts described in the FY 2005 plans. To that end, the Narrative questions for this year's local planning process have been slightly revised. While no longer requiring local areas to plan a specific number of initiatives for job seekers, employers or youth, the questions ask local areas to summarize progress made in the past year and to describe planned efforts that build upon that progress that reflect the national and state priorities. The guidance also asks local partners to describe planned "continuous improvement" projects that will enhance local performance and move the local One-Stop Career Center system forward in meeting the needs of the area's unique customer base.

The Narrative questions have been designed to stimulate each LWIB to plan and describe how the local workforce investment system's operational focus for FY 2006:

- relates to the primary customer sectors: job seekers, businesses and youth,
- reflects a current analysis of local labor market factors and need,
- includes locally initiated continuous improvement projects
- relates to specific economic benefits projected for the local area.

The FY 2006 planning guidance was drafted under the auspices of an Executive Planning Committee comprised of members representing the Workforce Board Association, Workforce Investment Association, Department of Workforce Development, Division of Career Services, and Commonwealth Corporation.

**Policy:** The LWIB, with agreement and signature of the Chief Elected Official (CEO) is responsible for developing and submitting the Fiscal Year 2006 Annual Business Plan. The Plan must be made available for public comment prior to submission in accordance with WIA regulations at section 661.345.

**Action Required:** Review the Local Annual Workforce Development Business Plan Guidance document and provide copies to those individuals who will develop the local plan.

**Inquiries:** Questions should be directed to [PolicyQA@detma.org](mailto:PolicyQA@detma.org).

**Filing:** Please file this in your notebook of previously issued WIA Communication Series Policy Issuances as #05-27.

**Electronic Submission Instructions will be issued under separate cover.**

# **FISCAL YEAR 2006**

## **Planning Schedule**

### **Annual Workforce Development Business Plan**

<b>April 13</b>	<b>FY 2006 Annual Workforce Development Business Plan Instructions (completed sections)</b>
<b>April 22</b>	<b>FY 2006 Annual Workforce Development Business Plan Instructions issued</b>
<b>April 26</b>	<b>Planning Session</b>
<b>June 3</b>	<b>Annual Workforce Development Business Plans submitted by CEOs &amp; LWIBs to DCS</b>
<b>June 15</b>	<b>State Approvals of Annual Workforce Development Business Plan Budgets</b>
<b>June 30</b>	<b>State Approvals of Local Plans sent to CEOs and LWIBs</b>
<b>July 1</b>	<b>Beginning of Fiscal Year 2006</b>

**ANNUAL WORKFORCE DEVELOPMENT**

**BUSINESS PLAN**

**PLANNING GUIDANCE**

**FISCAL YEAR 2006**

# ANNUAL WORKFORCE DEVELOPMENT BUSINESS PLAN

## PART I. INTRODUCTION

Over the course of the last two years, the Massachusetts workforce development system has been put to the test in responding to a loss of more than 200,000 jobs during the recent economic recession. The transition from the Job Training Partnership Act to the Workforce Investment Act happened during historic economic and job growth. The change in federal legislation represented a major shift in funding levels and service delivery within our state. The creation of the One-Stop Career Center system in the Commonwealth demonstrated our ability to implement the tenets of WIA by establishing a system of integrated services under one roof. Today, Massachusetts is ahead of many other states across the nation in its delivery of integrated services for job seekers and employers through the Career Center system. While there is always a desire to improve, refine and push for continued innovation, it is important to take a step back and think about the real accomplishments of regional and state partners since the enactment of the Workforce Investment Act. There is much to be proud of!

In FY 2006, we once again find ourselves in a time of uncertainty. The Workforce Investment Act (WIA) awaits reauthorization. The result of this process will impact federal revenue, policies, targeted customers, mechanisms for service delivery and many other potential areas of the system. All indications thus far suggest that Congress sees reauthorization as an opportunity to improve upon the concept of One-Stop Career Centers versus a radical shift in another direction.

### **National Priorities**

The United States Department of Labor's (US DOL) Employment and Training Administration (ETA) continues to drive its major initiatives in anticipation of new WIA legislation. In particular, ETA is focused on creating demand-driven workforce development services that respond to both businesses and workers. The ETA is stepping up its efforts to better understand high-growth industries across the nation to gather basic data on business needs for critical employment sectors. On behalf of the President, ETA has put forward its own proposal for WIA reauthorization called WIA Plus, as well as issuing state planning guidance documents that encourage states to incorporate several strategic priorities. A *first priority* is to continue the work started by WIA in streamlining workforce services and systems through service integration in One-Stop Career Centers. A related goal of ETA is to identify and eliminate parallel infrastructure systems and duplication of services or administrative activities in the workforce development system. A *second priority* is to increase the amount of training paid for through WIA resources, especially with funding that is "saved" through the streamlining of services. To support the priority of increased training, ETA will make available more than \$250 million in existing funding for discretionary grants to community colleges to provide demand-driven training in high growth industries. A *third strategic priority* is the implementation of ETA's new youth vision for the workforce development system. In particular, there is an expected shift to serve a greater portion of "the neediest youth" with WIA dollars, thereby reducing resources devoted to in-school youth. Lastly, national partners are in the process of *raising the level of accountability* within the workforce system and across various programs. Specifically, ETA has

developed a set of “common measures” to cut across WIA Title I, Wagner-Peyser and eventually other funding sources. *However, for the FY06 state and local planning cycles the original 17 performance measures, standards and review process will remain in place. Additional information on common measures related to a new FY06 State Plan is forthcoming from ETA. [This may change depending upon the TEGP to be released by DOL/ETA in the next two weeks.]*

National priorities are directly incorporated into the recent state guidance from ETA on developing a two-year interim or transitional Massachusetts State Plan<sup>1</sup> for the Workforce Investment Act and Wagner-Peyser over the next few months. The drafting of a two-year state plan will occur at the same time as the FY06 Local Annual Business Planning process. The priorities listed below will also be reflected in the FY06 and FY07 Massachusetts State Plan as well.

### **State Priorities**

Regardless of the uncertain horizon at the national level, the fundamental goal for federal, state and local partners will remain the same: to build a system of Workforce Boards and One-Stop Career Centers that respond quickly and effectively to changing economic conditions, demonstrated by the shifting needs of employers and workers.

This year, the Governor supported building the capacity of the workforce system to respond to the labor market in his FY06 budget request and recent “Jobs Bill” targeted to generating business growth in the state. Specifically, the Governor filed for new and additional funding in three major areas: flexible funding for the One-Stop Career Centers; training dollars for industry or business-driven training models to meet the needs of businesses and workers, and funding for at-risk, out-of school youth to create integrated work & learning models that lead to successful academic and employment outcomes. These three funding priorities will also align with the priority areas for the FY06 Local Annual Workforce Development Business Plans.

The state planning priorities for FY 2006 intentionally reflect the objectives of last year’s planning instructions. Local areas should reflect on progress made in each priority area described in last year’s Business Plan and build on and refine those strategies. The annual planning and modification process for the Workforce Investment Act (WIA) should incorporate a strategic local planning process for the area led by the local Workforce Investment Board in partnership with the Chief Elected Official that includes all key regional partners (Workforce Boards, Chief Elected Officials, Title I Administrators, One-Stop Career Center Directors) and spans WIA and non-WIA workforce development programs as appropriate. Specifically, the FY06 state planning priorities will fall into five major categories similar to last year: 1) integrated service delivery for job seekers; 2) outreach and enhanced services for businesses; 3) enhanced and integrated service delivery for youth; 4) emphasis on local area program performance, and; 5) regional preparation for changes resulting from WIA reauthorization. Each of the planning priorities for FY 2006 is described in greater detail below.

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<sup>1</sup> The Massachusetts 5 Year Unified Plan for the Workforce Development System will expire on June 30, 2005. ETA is requiring a two-year state plan as a replacement.

## 1. Integration of Service Delivery for Job Seekers

**Background:** The Workforce Investment Act (WIA) requires local service delivery areas to integrate core Adult WIA programs through One-Stop Career Centers. For the past several years, annual planning instructions have asked how additional programs potentially offered in a local area, such as TANF, employer-based training for incumbent workers, Workforce Training Fund programs, the Extended Care Career Ladder Initiative, BayStateWorks Initiatives, and Adult Basic Education, are integrated with and enhance the local system through the alignment of service delivery, data reporting, programmatic outcome requirements and evaluation.

Workforce Boards in partnership with Chief Elected Officials must play the lead role in setting policy and planning for services to meet the unique, regional needs of job seekers and workers as negotiated through the established charter with the One-Stop Career Center. The One Stop Career Centers should serve as the focal point for the region's workforce development operations and service delivery system; this system should link with appropriate education or training providers in a coordinated and efficient fashion based upon the overall Business Plan for the region. Massachusetts has made great strides in overall service integration through One-Stop Career Centers. We do not have stand-alone Unemployment Walk-in centers and many OSCCs have Adult Education, TANF and MRC services or staff on-site. All OSCCs utilize a common data system to track customer demographics, eligibility, activities and outcomes across multiple funding streams. Some local areas have implemented continuous improvement processes for OSCCs, cross-training of staff, comprehensive chartering documentation, and cost-sharing financial models to charge against various grants. These examples demonstrate innovative steps toward tightly integrated services that maximize benefits for customers.

In the FY05 Business Plans from last year, several job seeker strategies were frequently identified across regions. Many local areas described their need to refine the system's capacity to serve job seekers facing barriers to employment or who are under-represented in the labor force. Creative customer outreach strategies, service coordination, targeted case management, stronger partnerships with community based organizations, and enhanced workshops or new OSCC services were identified by these areas as goals for FY06. Two local areas mentioned a need for a "job readiness" or "employability" certificate to better serve job seekers and employers. Business Plans also outlined strategies to enhance services for the Connecting Claimants population at the OSCCs and integrate programming related to this initiative into the day-to-day management activities of the Centers. One local area identified detailed strategies to enhance job seeker services through the use of professional development activities for all OSCC staff and the supply of performance data from various sources to managers.

**Planning Actions Expected:** In responding to narrative questions each local business plan is expected to describe the specific roles and responsibilities of the local Workforce Board, Title I Administrator and One-Stop Career Center(s) within the framework of the regional infrastructure focusing on the reduction of duplication and streamlining of local governance and administrative structures wherever possible. In addition, the narrative questions will ask each area to build off of the prior year's three strategies to integrate and enhance services for job seekers. Responses should articulate how each local entity supports the implementation of specific strategies for job seekers as appropriate to the entity's role. This response should also describe the strategies put in place to expand and improve service integration with the One Stop Career Center system for example, cross-training of staff, issues around supervision and management of Career Center partner staff, common job descriptions for partner staff, financial cost-sharing practices, etc.

## 2. Outreach to Employers

**Background:** The ability of the workforce development system to engage and work with the employer community is critical to the success of the people receiving services as well as the overall economic success of the region and state. Employers are the ultimate consumer of workforce development services in their capacity to hire, train, retain and invest in the workforce. The Department of Workforce Development (DWD) and the Division of Career Services (DCS) will continue to work with local areas to jointly develop policies and initiatives that increase employer engagement and use of the workforce development system. One major effort in building the system's capacity to serve business should focus on the ability of One-Stop Career Centers to respond to employers. The private sector members of Workforce Boards have a unique position to make recommendations on this goal. In addition to OSCC business services, statewide resources have been available in the last three years to work with consortia of employers to design integrated education and training activities. It is critical that the public workforce system engages business through these opportunities in order to improve the quality of response provided by the public workforce system. These business-driven training models are funding priorities at both the national and state levels.

In the FY05 Business Plans from last year, several employer strategies were frequently identified across local areas. The majority of local areas outlined activities to enhance the outreach and promotion of OSCCs to employers. In some local areas, Workforce Boards and OSCCs developed Employer Service Teams at OSCCs by realigning staff duties across various funding streams (Wagner-Peysers, WIA etc) to create the team. One area engaged the private sector members of the Workforce Board with the staff to design new employer engagement activities. A few local areas described their critical industries and developed specific marketing activities, including directly targeting Industrial Parks and other geographically employer clusters.

**Planning Actions Expected:** The Department of Workforce Development, in coordination with its agencies, will embark upon an employer outreach campaign in partnership with Workforce Investment Boards and One-Stop Career Centers. The primary goals for FY 2006 will be to increase direct employer involvement with Workforce Boards and the Career Centers in order to develop more responsive employer customer service options and improve existing programs, especially by involving the participation of private sector members of local Workforce Investment Boards. Local areas will be asked to identify strategies to serve employers in its FY06 Business Plan. Responses should also articulate how each local entity supports the implementation of specific strategies for employers and their workers as appropriate to the entity's role.

## 3. Enhancing Youth Services

**Background:** The Workforce Investment Act is in the process of being reauthorized by Congress with the expectation that during the course of FY 2006, local workforce investment boards and youth councils may be asked to implement changes in youth service priorities, provide a different mix of youth service elements, and respond to new performance measures. The major proposed change to youth services is a shift in targeted resources from *in-school* to *out-of-school* youth. This year, the ETA issued a new vision for youth services that incorporates this priority and others.

USDOL training and employment guidance letter (TEGL) number 03-04 was issued on July 16, 2004, outlining the Employment and Training Administration's (ETA) "New Strategic Vision for the Delivery of Youth Services under the Workforce Investment Act (WIA)". Much of the New Strategic Vision is based on the White House Task Force on Disadvantage Youth (2003). USDOL's new vision seeks to: improve outcomes for the most vulnerable youth; focus on improved program performance; addresses the labor market and business needs, and; connect with alternative education.

- **The need to focus greater investment in youth who are at-risk of not meeting the standards.** By almost any measure of success, at-risk youth often lack a basic education or skill foundation to take advantage of further education, occupational training or opportunities in the labor market.
- **The need to address labor market and business needs for youth.** The need for making connections to employers for youth is of paramount importance. Areas need to consider the implications for outcome impact relative to youth performance measures as well as the general quality of life issues in their communities including business retention and relocation in the area.
- **The need at the state and local levels, to find new ways to coordinate education, human services, and employment support for youth.** Strategies to assist at-risk and out-of-school youth will work if they also address related issues of poverty, disabilities, health and family issues, as well as providing structured access to employment and further education.
- **The need to focus on new youth performance measures.** As the requirements for youth performance measures are set to change, each region should look at the impact these measures will have on the region's ability to meet performance standards.

The Commonwealth of Massachusetts has taken the first steps, unlike many other states in the nation, at the state and regional levels to address needs of vulnerable youth in a systemic way. An initiative *Pathways to Success by 21 (P21)* has been established as a multi-agency effort designed to create a better alignment of youth services and youth policy. "P-21" is a strategic process coordinated by workforce investment boards and their youth councils and OSCCs that will improve communication and coordination of youth service delivery. The goal is to bring together partners from workforce development, human services, foster care, juvenile justice, welfare-to-work and transitional assistance, pregnant and parenting teens, housing and community development, and transportation to identify a unified strategy for serving youth in a region. The process should focus on the youth needs in a region, identify the barriers to coordinated delivery and referrals, and identify the breaks in capacity and the existing strengths to meet youth needs in the region. The unifying goals or outcomes expected across various partners include:

- increase the number of at-risk youth who graduate with higher academic skills and credentials;
- increase the number of at-risk youth who enter, and continue with postsecondary education;
- increase the number of at-risk youth placed in jobs that have career potential, and;
- narrow the performance gap for students from poorer families, racial and linguistic minorities, and those with special needs.

Throughout FY06, the information contained in P21 regional applications and Strategic Action Plans will inform state agencies on how they should make changes to state policies and procedures to make it easier to deliver services in a region.

**Planning Actions Expected:** Workforce Investment Boards, Youth Councils, Title I Administrators and OSCCs will be expected to engage their communities around the *P-21 Initiative* activities in the development of a Strategic Action Plan as it takes shape during the first few months of FY06. Workforce Boards and Youth Councils should play a role in convening and informing community partners, including OSCCs, about local youth resources based upon prior years of “resource mapping” and strategic planning. The information learned through the P21 process and through conversations with local partners on the demand for youth services in the local area should be reflected in the strategies identified for youth services in the annual FY06 Business Plan.

Workforce Boards, Youth Councils, One-Stop Career Centers and community partners need to prepare changes resulting from WIA re-authorization. Through the development of the annual Workforce Development Business Plan, regional partners should review youth programs currently supported by local areas to reposition their funding to support this shift in target population. In addition, local partners must put greater emphasis on the performance of programs for youth. Ten of the state’s workforce investment areas did not meet at least one of the FY 2004 WIA Title I Youth Performance Measures and nearly half did not reach local performance levels for three or more of the seven indicators. As well, the 2003 – 2004 quality assurance reviews and other reviews of data elements in MOSES have clearly identified wide ranging inconsistencies in the interpretation, recording and reporting of services provided across all programs, including youth. Despite recent improvements to the youth program there still remain concerns with oversight systems and processes to insure timeliness, accuracy, and completeness of data entry including readily verifiable source data in client files. Local areas are asked specific questions on WIA youth performance in the FY06 local planning instructions.

#### **4. Performance and Accountability**

**Background:** Over the FY05 planning cycle, greater emphasis was placed on performance and accountability for workforce development programs at the state level. A One-Stop Career Center review was initiated to develop baseline quantitative and qualitative information on the system. In addition, four new Workforce Integration Manager positions were established to assist local areas in making progress toward attaining local Business Plan goals, improving partner relationships (WIA and non-WIA), program performance and information-sharing and shaping effective workforce development models. Several statewide workshops on WIA and Wagner-Peyser performance were sponsored by DCS and CommCorp and facilitated by Public-Private Ventures.

Despite these efforts, Massachusetts struggled with several performance measures through FY04 and the beginning of FY05. In June of 2004, Massachusetts renegotiated lower performance standards for WIA Title I performance measures given continued economic challenges and the state’s difficulty in meeting state standards. Specifically, the **six-month adult earnings gain** goal was reduced to **\$3,500** from \$3,900 and the **six-month older youth earnings gain** goal of **\$2,700** replaced the goal of \$3,000. A significant rationale for renegotiation was the challenge of meeting these standards due to the economic downturn and job availability in the state compared to the rest of the nation. As the state renegotiates WIA performance measures for FY06 and

FY07, there is a clear expectation from the national office that state standards will be raised to reflected improvements in the economy as well as national performance levels.

As part of the development of a FY06 and FY07 Massachusetts State Plan for WIA and Wagner Peyser, the USDOL/ETA Administration expects the state to review our existing state standards against the actual WIA Title I performance rates across other states *and* the set of national standards applied to USDOL/ETA programs called the Government Performance and Results Act (GPRA) goals. The national Administration expect states and local areas across the country to set state standards to meet GPRA goals, thereby raising existing state standards if they are currently lower than GPRA goals. The Massachusetts state standards for WIA Title I will be renegotiated as part of the State Planning process. These standards will ultimately “set the baseline” for the FY06 Regional Business Plan Instructions.

**Planning Actions Expected:** For the FY06 Workforce Development Business Plan, each area is expected to align regional WIA Title I performance standards with the new state performance standards approved by USDOL/ETA for the FY06 and FY07 State Plan. FY06 Business Plans should describe the process completed by regional partners -- Workforce Boards, Chief Elected Officials, WIA Title I Administrators and OSCCs -- to set regional performance standards for the year. The FY06 Business Plan instructions ask regional partners to identify local strategies employed to raise performance on weak measures *and* those to which strong performance on high-performing measures may be attributed.

## **5. WIA Reauthorization – Get Ready!**

**Background:** The reauthorization of the Workforce Investment Act is under consideration in Congress. The specific policy and programmatic changes resulting from this process are still unclear. However, several versions of new bills put forward by Congress and the President agree on a few key requirements for the system. One significant (but potential) change is the establishment of a certification process for OSCCs that meets national baseline standards for service delivery. Although we do not know the details of this process, we must think ahead as to how Massachusetts should respond to the implementation of a new certification process. We support the implementation of a Career Center certification process. Within the Massachusetts FY06 and FY07 State Plan for WIA and Wagner Peyser, we will outline a process through which local chartering entities, DCS and DWD and Workforce Investment Boards, will work with Career Center stakeholders to develop a OSCC system certification process in alignment with federal legislative actions and current one-stop chartering activities.

**Actions Required:** Over the course of FY06, state partners will seek the participation of local partners to review current certification processes of other states, to review current chartering processes by Workforce Boards that relate to certification standards, and to develop a better understanding of the USDOL requirements for certifying OSCCs.

## **PART II. LOCAL LABOR MARKET ANALYSIS**

To ensure that services provided under the Workforce Investment Act address relevant labor force and employer needs, an analysis of local labor market conditions is a critical component of the annual planning process. An understanding of the economic trends and characteristics that shape the local labor market environment is essential to developing focused strategies and initiatives and to design an appropriate mix of employment and training services that will support efforts for continued economic development and growth.

Describe the specific local labor market conditions and characteristics that form the basis of your FY 2006 Workforce Development Business Plan. The analysis should include a clear description of each of the following elements:

1. The current industry employment trends, with an emphasis on the identification of industries experiencing either major growth or decline.
2. The projected industry and occupational employment opportunities for local job seekers.
3. The job skills and training requirements necessary for employment in locally targeted industries and occupations.
4. The demographic characteristics of the area's population base relevant to local workforce development issues including projected education/skill training needs.

The conditions and characteristics described in the Labor Market Analysis section of your local FY 2006 plan (PART II) should clearly inform and support the planned initiatives and service focus described in the responses to the questions in the Narrative section of the Plan (PART III)

Instructions for accessing web-based labor market information for FY 2006 planning purposes [developed by the Office of Economic Analysis of the Division of Unemployment Assistance (DUA)] were previously provided in WIA Communication Information Issuance No. 04-13 (February 25, 2004). Labor market economists from DCS's Office of Economic Analysis are able to assist with additional information and can be contacted at 617-626-5744.

Use of additional information sources, including business survey results, local advisory groups, specific economic development reports and any other source of relevant local labor market information is encouraged.

## **PART III. PLAN NARRATIVE**

All responses should reflect a detailed, planned approach that clearly indicates a full and efficient integration and coordination of partner services for the local area. Responses should address service delivery from a system-wide perspective that illustrates a coordinated planning process among all local partners and clearly reflects consistency with the national and state priorities described in the Introduction, above. Responses should also relate the broad spectrum of

services to be provided locally with all appropriate Workforce Investment Board and One-Stop Career Center partner resources, not only DCS administered funding resources.

The response to each question below should clearly articulate how the local Workforce Investment Board will specifically support the initiatives/objectives that are described in the FY 2006 Local Workforce Development Annual Business Plan. This information regarding Board support will be utilized by the Department of Workforce Development in the review of the state funding for Local Workforce Investment Boards and Youth Councils through the Workforce Training Fund allocation of the state budget.

Each response should also clearly demonstrate a direct correlation to the area's current labor market characteristics [as described in the Labor Market Analysis section of the plan (PART II)], must also reflect how input from the local business community was utilized and accommodated in the development of each initiative and should describe how all partners collaborated to develop the responses.

**1. Please describe the local area's overarching initiatives/objectives for providing services to job seekers for FY 2006?**

- a. The response should focus on efforts to be primarily funded through the local area's general FY06 allocation, but should also describe the status/progress made on the jobseeker initiatives cited in the FY05 Plan and how the planned FY06 focus builds on the prior year's efforts. The response should also demonstrate that efforts will respond not only to the needs of the general job seeker customer base, but to specifically targeted job seeker constituencies as well (UI claimants, Veterans, EAS participants, the Disabled, Youth, Offenders, etc.).
- b. The response should clearly explain the basis of the area's FY06 job seeker strategies/service design, the anticipated service and performance goals (requested in Part V of the planning instructions) and the expected benefit to the local economy.
- c. The response should outline the specific, collaborative roles of the Board, the Title I Administrator and the area's Career Center(s) and the specific planned activities and/or strategies to support the FY06 job seeker initiatives/objectives.

**2. Please describe the local area's overarching initiatives/objectives for providing services to employers for FY 2006?**

- a. The response should focus on efforts to be primarily funded through the local area's general FY06 allocation, but should also describe the status/progress made on the employer initiatives cited in the FY05 Plan and how the planned FY06 focus builds on the prior year's efforts. The response should describe how the planned focus will apply not only to business customers in general, but to any sectors of the business community specifically targeted by the Local Workforce Board for special consideration based on their projected significance in promoting economic stability and development in the local area.
- b. The response should clearly explain the basis of the area's FY06 employer strategies/service design, the anticipated service and performance goals and the expected benefit to the local economy.

- c. The response should outline the specific, collaborative roles of the Board, the Title I Administrator and the area's Career Center(s) and the specific planned activities and/or strategies to support the FY06 employer initiatives/objectives.

**3. For FY 2006 what are your area's primary priorities and strategies for managing and improving performance and access to the WIA Title I youth services? How did the region identify these priorities and strategies (labor market information and research, demographics of youth and resulting needs, etc.)? How will the local program of youth services incorporate the practice of "youth voice" into the development of these strategies (membership on Youth Council, focus groups, surveys, etc.)? Describe progress in meeting youth program priorities and performance goals described in your FY05 Annual Business Plan.**

- a. The response should describe the steps being taken to increase employer connections to the WIA Title I youth program for the purpose of improving youth performance outcomes and how those outcomes contribute an economic benefit to the local workforce investment area.
- b. The response should identify which segments of the Title I WIA eligible youth population have highest priority and the model(s) of service delivery that are of required to address the unique needs of the priority population. The response should also indicate planned strategies to increase the number of *all* youth (not only WIA title I eligible youth) who utilize the local Career Center(s) for information and services.
- c. The response should describe how youth-serving organizations and community-based organizations are networked within the area's workforce development system as leveraged resources for outreach, support services and follow-up for youth program participants.
- d. The response should describe major barriers to youth program implementation in your area (e.g. management of sub-contractors, workforce systems issues, environmental factors, etc.). The response should include a description of priorities for technical assistance for your area for FY06.
- e. The response should describe the roles of the Workforce Investment Board, Title I administrator, framework service provider and competitively procured service providers (including follow-up services) in ensuring quality performance outcomes. It should articulate how the WIB or Youth Council completes the required oversight and monitoring of youth program vendors. It should also describe changes to the procurement or oversight procedures being planned for FY 2006 and outline responsibilities/changes in responsibilities of partners named above.
- f. The responses should incorporate the tenets of the USDOL New Strategic Vision and the "Pathways to Success by 21" initiative and should clearly describe how the new youth vision and P21 changes the dynamics of the WIA Title I youth program service delivery model in the local area (refer to section I part 3: Enhancing Youth Services). For example, how will the local area choose to organize the activities of "Pathways to Success by 21", and if applicable the Massachusetts Partnership for Youth in Employment (MYPE), and any other major alignment initiatives/programs.

4. **Please describe how the local area will allocate training funds and resources in FY06 to assure skill enhancement across the broadest adult and dislocated worker customer base?**
  - a. The response should describe how the local plan for customer training ensures an appropriate and equitable allocation of the area's total available resources in relation to the allocation of resources for other One-Stop Career Center services and operational cost categories.
  - b. The response should clearly describe how the local One-Stop Career Center(s) will ensure a timely response to customers (job seekers and employers) training needs.
  - c. The response should also clearly demonstrate that policies of the Board and procedures of the Title I Administrator, the Fiscal Agent (if a separate entity) and the Career Center partners support a training decision-making process that incorporates assessment of an individual customer's future employment interests and labor market demand.
  
5. **What specific continuous improvement initiatives are planned by the local partners in FY06 to strengthen the operation of the One-Stop Career Center(s)?**
  - a. The response should describe specific projects planned by the local partners to promote improvement in local service delivery for FY 2006 and should include a discussion of gains from the prior year's improvement initiatives and how the FY 2006 plans build on those outcomes. The response should also clearly describe how the planned improvement initiatives are supported by the Board, Title I Administrator and the local Career Center partners.
  - b. The response should specifically highlight locally generated continuous improvement plans to be implemented to assure attainment of *all* FY 2006 performance goals and should include a description of the anticipated outcomes and benefits to customers. If any of the 17 local performance goals were not met in FY 2004 please describe the specific activities undertaken in FY 2005 and planned for FY 2006 to assure improvement of performance on the goals not met in FY 2004.

## **PART IV. ASSURANCES**

The following section delineates the formal assurances related to statutory compliance, program integration, universal access, customer choice, reporting, veterans' priority of service, performance, quality assurance and other program and administrative elements to which each Local Workforce Investment Board agrees, ensuring the systemic foundation of the Massachusetts workforce investment system. By signing the local plan the Board certifies that the operators and partners of the local one-stop career center delivery system will adhere to these assurances and comply with all Federal, State, County and local statutes, regulations and policies relevant to the delivery of services within the context and meaning of the local plan.

## **1. STATUTORY COMPLIANCE**

The Board agrees to comply with the Workforce Investment Act of 1998, the Wagner-Peyser Act, as amended, the Trade Act of 1974, as amended, the Jobs for Veterans Act and all related statutory requirements and implementing regulations. The Board also agrees to comply with policies issued by the Department of Workforce Development, the Division of Career Services, the Division of Unemployment Assistance and the Commonwealth Corporation related to the administration, delivery and performance of all programs covered by this local plan.

## **2. PROGRAM INTEGRATION**

The Board assures that the one-stop career center delivery system will fully integrate all programs covered under this local plan into the full range of available workforce development services.

The Board agrees that DVOP and LVER staff will be responsible for case management of veterans' service delivery, and where feasible, provide direct services or assist one-stop delivery system staff in the provision of priority services for veteran customers.

The Board assures that one-stop career center system operators will coordinate with local Rapid Response staff related to outreach, intake and registration of workers covered by a certification under the Trade Adjustment Act.

## **3. UNIVERSAL ACCESS**

The Board assures that the local one-stop career center delivery system [as described in Part 662.100 (b) of the Workforce Investment Act and in accordance with all relevant state policies and procedures] will provide services to all customers consistent with the principles of universal access. The Board also assures that core and applicable intensive services, including staff-assisted services, will be provided in at least one physical career center in the local area.

The Board assures that LVER and/or DVOP staff assigned to the local one-stop career centers, consistent with the principle of universal access, will also provide outreach services to veterans at Service Delivery Points (SDPs) such as Veterans Administration Hospitals, veterans' shelters and military installations for which no LVER or DVOP is assigned. The Board also assures that DVOP and LVER staff will also conduct outreach to employers, community agencies, veterans' organizations, etc. and that they will share information gained from these contacts with staff of the one-stop career centers and SDPs.

## **4. CUSTOMER CHOICE**

The Board assures that local one-stop career center system operators and partners will adhere to the principles of customer choice in the provision of services covered under this local plan.

## **5. REPORTING**

The Board assures that the local one-stop career center delivery system (in accordance with all relevant Federal and State policies and procedures) will collect data on customer characteristics, service/activity participation, and outcomes consistent with the requirements of the Massachusetts One Stop Employment System (MOSES) so as to ensure the integrity of all federal and state reporting requirements.

## **6. FUNDS OF LAST RESORT**

The Board assures that one-stop career center system operators shall take sufficient actions to assure that WIA programs will not be charged when other assistance is available. Local operators shall be responsible for ensuring the filing of applications for Pell Grant or Supplemental Education Opportunity Grant (SEOG) assistance or any other assistance available for each participant enrolled in a Pell Grant or SEOG approved course and upon receipt of such grant the portion received by a training participant for the cost of tuition, fees and books shall be applied to replace the WIA funds used to cover such costs. If the Pell Grant is received after the termination of training paid with WIA funds, the portion to be applied for the cost of tuition, fees and books shall be remitted to the career center operator. No compensation shall be earned or deemed payable for services provided to a WIA program participant to the extent that any such services are paid for, directly or indirectly, through a Pell Grant (or Supplemental Education Opportunity Grant (SEOG)) by Trade, or by any other source.

## **7. VETERANS PRIORITY OF SERVICE**

The Board agrees that one-stop career center operators will assure priority services for veterans for all services funded with Federal resources. The Board also assures that it will encourage and promote the provision of maximum employment and training opportunities to veterans by all service program providers participating in the local workforce investment system. To promote informed choice for veteran customers, the Board agrees that one-stop career center delivery system operators will provide information during the intake process that advises veterans of the advantages of registration to access special programs and services for veterans and the availability of DVOP or LVER staff to assist with employment issues. To further assure priority of service and maximum opportunity to veteran customers the Board agrees that one-stop career center operators will integrate Federal Contractor Program job information and listings of Federal job openings in the MOSES system. Both printed and electronic Federal Contractor Program and Federal job information will be available to veteran customers. Federal Contractors and Federal Agencies will be provided with recruitment assistance in accordance with their obligation for Affirmative Action and veterans' preference requirements pursuant to 38 U.S.C., Chapter 42.

The Board assures that one-stop career center operators will provide information relative to filing complaints with the State VETS Director to veteran customers.

LVER and DVOP staff will provide training and technical assistance to one-stop career center staff relative to Federal employment opportunities for veterans, the Federal Contractor Job Listing Program and the customer complaint process as it relates to veterans.

LVER staff will monitor and provide quarterly reports to the one-stop career center operator on the universality of veteran services provided by one-stop delivery system staff and the access and receipt of these veteran services.

The Board agrees that under this plan LVER and DVOP staff can receive guidance from the one-stop operator. However, compensation, personnel actions and terms and conditions of employment, including performance appraisals and accountability of merit-staff employees will remain under the authority of DCS.

## **8. ALIEN LABOR CERTIFICATION – AGRICULTURAL**

The Board assures that the local one-stop career center operators (in accordance with all relevant state policies and procedures, and as required under provisions for the equitable delivery of labor exchange services at 20 CFR Parts 651, 653 and 658) will: identify Migrant and Seasonal Farm Worker (MSFWs) customers; refer such identified customers to appropriate job openings, training opportunities and any other workforce investment services as needed; conduct appropriate follow-up with employers and other applicable service providers; and report all relevant activities through MOSES.

## **9. ALIEN LABOR CERTIFICATION – NON-AGRICULTURAL**

The Board assures that the local one-stop career center operators (in accordance with all relevant state policies and procedures, and consistent with provisions for the hiring of non-U.S. workers at 20 CFR Part 656) will assist job seekers to comply with the requirement of forwarding two resumes to the DCS Special Programs/Alien Labor Certification unit for consideration of their qualifications with regard to a specified employer job order. There are no reporting requirements applicable to this section.

## **10. WORK OPPORTUNITY TAX CREDIT and WELFARE-TO-WORK CREDIT**

The Board assures that the local one-stop career center operators will determine eligibility of interested customers as members of targeted groups; and assist interested customers to complete related documentation including IRS Form 8850 Work Opportunity Credit Pre-screening Notice and Certification Request, and DOL Form ETA-9062 Conditional Certification. Issuance of final certifications will remain a central administrative responsibility of DCS. There are no reporting requirements applicable to this section.

## **11. WORKER PROFILING/REEMPLOYMENT SERVICES PROGRAM**

The Board assures that local one-stop career center operators will participate in the Connecting Claimants to Career Centers program consistent with requirements of the federal Profiling/Reemployment Services Program for designated UI claimants and related State policies. The Board further assures that the local one-stop career center operators will collect data on claimant service/activity participation, outcomes and results, including conformance with the Worksearch Plan activities, through the Massachusetts One Stop Employment System (MOSES).

## **12. SECTION 30/TAA**

The Board assures that local one-stop career center operators will provide timely and appropriate services for any claimant wishing to apply for benefits under either Section 30 of Chapter 151A of Massachusetts General Law for the Unemployment Insurance program or the Trade Adjustment Assistance program and conform to the regulations controlling these programs. The Board assures that local one-stop career center operators will provide timely assistance to customers with the application process for UI benefits, training services, and other related program allowances. The Board also assures that local one-stop career center operators will cooperate with any Hearings requirements related to UI and /or TAA benefit eligibility issues.

## **13. ACCESS TO UI INFORMATION**

The Board assures that local one-stop career center operators will use any information received from the UI system related to claimants solely for the purpose of providing reemployment services to UI claimants. The Board further assures that all information on UI claimants received by the one-stop career center operators will be used in a manner that is consistent with state and federal confidentiality statutes.

## **14. PERFORMANCE**

The Board agrees that for purposes of this plan, performance will be measured consistent with all appropriate federal and/or state statutes, regulations and policies.

## **15. CASE MANAGEMENT SERVICES FOR TARGETED CUSTOMERS**

The Board assures that one-stop career center operators will provide case management services for targeted customers consistent with state policy. Customers targeted for case management services include: WIA Title I enrollees; military veterans who are recently separated veterans, disabled veterans; veterans with a campaign badge; minority and/or female veterans, any veteran with a barrier to employment; spouses of: veterans who died of a service connected disability, are MIA, are captured/POW, or is the spouse of any person who has a total permanent service connected disability; Employment Assisted Service (EAS) participants; National Emergency Grant (NEG) participants; and Trade Adjustment Assistance (TAA) participants.

## **16. GENERAL QUALITY ASSURANCE**

The Board assures the local one-stop career center operator will carry out all activities relevant to the provision of each program covered under this plan in accordance with all Federal/State policies and procedures. The Board further assures that a schedule for the monitoring of local one-stop career center activities will be developed and agreed upon in concert with the Division of Career Services (DCS). Additionally, the Board assures that DCS shall have full access to all one-stop career center staff, records, systems, data, books, accounts, correspondence and other documentation necessary to carry out its program evaluation responsibilities as authorized by statute and/or regulation. The Board also agrees that DCS, in order to effectively carry out its responsibilities, may conduct on-site evaluation

activity that is either with, or without, advance notice. The Board also assures that local staff training relevant to the delivery of services covered under this plan will be developed and agreed upon in concert with DCS.

## **17. NONDISCRIMINATION EMPLOYMENT & EQUAL OPPORTUNITY**

The Board assures that the local one-stop career center operator will comply fully with the nondiscrimination and equal opportunity provisions of the following laws: Section 188 of the Workforce Investment Act of 1998 (WIA), which prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and against beneficiaries on the basis of either citizenship/status as a lawfully admitted immigrant authorized to work in the United States or participation in any WIA Title I financially assisted program or activity; Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the bases of race, color and national origin; Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities; The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age; and Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs. The Board also assures that it will comply with 29 CFR Part 37 and all other regulations implementing the laws listed above. This assurance applies to the operation of the WIA Title I financially assisted program or activity, and to all agreements made to carry out the WIA Title I financially assisted program or activity. The Board understands that the United States, Massachusetts and the Division of Career Services have the right to seek judicial enforcement of this assurance. The Board also assures that the local one-stop career center operator will appoint an Equal Opportunity Officer to ensure compliance with the regulatory requirements cited above.

## **18. GRIEVANCE PROCEDURE POLICY**

The Board assures that the local one-stop career center operators will implement and maintain a formal complaint system consistent with State policy and Federal regulations promulgated at 20CFR §658.400-658.500 and §667.600-667.640 relevant to the Workforce Investment Act of 1998 and the Wagner-Peyser Act, as amended.

## **19. NONPARTICIPATION IN SECTARIAN ACTIVITIES**

The Board assures that WIA Title I funds will not be expended on the employment or training of participants in sectarian activities. Participants must not be employed under Title I of WIA to carry out the construction, or maintenance of any part of any facility that is used or to be used for sectarian instruction or as a place of religious worship. However, WIA funds may be used for the maintenance of a facility that is not primarily or inherently devoted to sectarian instruction or religious worship if the organization operating the facility is part of a program or activity providing services to WIA participants.

## **20. POLITICAL ACTIVITIES, LOBBYING PROHIBITION**

The Board assures that WIA Title I funds and none of the services provided with said funds may be used for any partisan or non-partisan political activity or to further the election or

defeat of any candidate for public office. The Board also agrees to comply, where applicable, with the provisions of the Hatch Act, which limits the political activity of certain State and local government employees, along with contractors, subcontractors and participants funded through the use of WIA funds. The Board shall comply with 29 CFR 93 regarding the restrictions on lobbying and the Certification and Disclosure requirements pursuant to Section 319 of Public Law 101-12.

## **21. CERTIFICATION REGARDING DEBARMENT**

The Board certifies, that neither it nor its principals:

- are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
- have within the 3 year period preceding this plan been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements or receiving stolen property.
- are presently indicted or otherwise criminally or civilly charged by a government entity (Federal, State or local) with the commission of any of the offenses enumerated in paragraph (b) above.
- have within the 3 year period preceding this application had one or more public transactions (Federal, State or local) terminated for cause or default.

## **22. HEALTH AND SAFETY**

The Board agrees all services provided to participants under the programs covered under this plan will take place in an environment where appropriate standards for health, safety and comfort are maintained. Participants in on-the-job training operated with WIA funds as defined in 20 CFR Part 663.700, are subject to the same health and safety standards established under State and Federal law which are applicable to similarly employed employees, of the same employer, who are not participants in programs under WIA. Facilities will be adequately heated and ventilated; with adequate toilet, rest and lunch areas; easy access to potable water; and separate and clearly delineated non-smoking areas.

## **23. NEPOTISM**

The Board assures that no recipient of funds covered under this plan will hire a person in an On-The-Job Training position, administrative capacity or consultant position funded under WIA if the individual or a member of his/her immediate family is employed in the administrative capacity of the USDOL, DWD, DCS, Commonwealth Corporation or the recipient. The Board agrees to inform the Division of Career Services of any potential violation of the nepotism restriction.

## **24. UNIONIZATION AND ANTI-UNIONIZATION**

The Board assures that no funds covered by this plan shall in any way be used to either promote or oppose unionization.

## **25. FINANCIAL RECORDKEEPING, COST PRINCIPLES AND COST ALLOCATION**

The Board agrees to maintain all financial records, and to develop and follow cost allocation procedures that are in compliance with GAAP, Federal Cost Principles, all applicable OMB Circulars, and policies issued by the Commonwealth. These include, but are not limited to, the following OMB Circulars:

- A-21, Cost Principles for Educational Institutions (10/27/98)
- A-87, Cost Principles for State and Local Governments (5/4/95, amended 8/29/97)
- A-122, Cost Principles for Non-Profit Organizations (5/19/98)
- A-102, Grants and Cooperative Agreements with State and Local Governments (10/7/94, amended 8/29/97)
- A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations (11/19/93, amended 9/30/99)
- A-133, Audits of States, Local Governments, and Non-Profit Organizations (6/24/97).