

# Mass Workforce Issuance

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**Workforce Issuance No. 06-17**

**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 Associate Directors  
DCS Field Managers

**cc:** WIA State Partners

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

**Date:** March 16, 2006

**Subject:** Fiscal Year 2007 Local Annual Workforce Development Business Plan

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**Purpose:** To provide instruction to the Local Workforce Investment Boards (LWIBs), regarding the development and submission of the FY 2007 Annual Workforce Development Business Plan.

**Background:** As was the case for the FY 2006 planning cycle, the FY 2007 Local Annual Workforce Development Business Plan Guidance was developed in the absence of Congressional reauthorization of the Workforce Investment Act (WIA). The development of this year's local planning guidance has been structured to be consistent with the second year of the two-year State Plan submitted by the Commonwealth in Fiscal Year 2006. As a result, the planning guidance described herein reflects the continuing federal direction toward: streamlined service delivery, the provision of youth services geared toward out-of-school youth and increasing local accountability. Additionally, the three strategic priorities incorporated into the State Plan by the Commonwealth to enhance the capacity of local workforce systems to respond to labor market demand also remain in effect. These State priorities 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.

A continuum of effort forms the underlying basis for this year's local planning process. To that end, the Narrative questions reflect only slight revisions, if any. The questions reflect a desire for local areas to summarize progress made in the past year and to describe planned efforts that build upon that progress and reflect the national and state priorities. The guidance also asks local partners to describe specific "continuous improvement" projects that will be undertaken during Fiscal Year 2007 that are intended to enhance local performance and enable the local One-Stop Career Center system to more effectively meet the needs of the area's unique customer base.

The Narrative questions are intended to stimulate each LWIB to plan and describe how the local workforce investment system's operational focus for FY 2007:

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

**Policy:** The LWIB, with agreement and signature of the Chief Elected Official (CEO) is responsible for developing and submitting the Fiscal Year 2007 Annual Workforce Development 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.

**NOTE:** Specific instructions regarding the plan submission process and time frame will be communicated in a forthcoming MassWorkforce Issuance. This should not prohibit local areas from initiating the development of their local plans based on the guidance provided in this issuance.

**Effective:** Immediately

**Inquiries:** Please email all questions to [PolicyQA@detma.org](mailto:PolicyQA@detma.org). Also, indicate Issuance number and description.

**ANNUAL WORKFORCE DEVELOPMENT**

**BUSINESS PLAN**

**PLANNING GUIDANCE**

**FISCAL YEAR 2007**

**ANNUAL WORKFORCE DEVELOPMENT**

# **BUSINESS PLAN**

## **PART I. INTRODUCTION**

### **Priorities for FY 2007**

Despite 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 FY 2007 budget request. 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 also align with the priority areas for the FY 2007 Local Annual Workforce Development Business Plans.

The state planning priorities for FY 2007 intentionally reflect the objectives of last year's planning instructions. Local areas should reflect on the challenges and progress made in developing their One-Stop Career Centers and various initiatives to strengthen the workforce development system in their region. The annual planning and modification process for the Workforce Investment Act (WIA) in FY 2007 should act as the 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 other partners as desired) and spans WIA and non-WIA workforce development programs as appropriate. This year, changes were made to the integrated budget to better reflect the typical federal and state, WIA and non-WIA funding streams managed by local areas. A review of past local area integrated budgets generated the list of resources included in this year's integrated budget template.

Specifically, the FY07 state planning priorities will fall into four 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; and, 4) emphasis on local area program performance. Each of the planning priorities for FY 2007 is described in greater detail below. Local areas will be expected to describe and expand upon prior year strategies identified in these areas. *NOTE: The questions related to youth programming were refined and targeted to emphasize potential program design changes that will be required at the local level as a result of the pending WIA Youth Common Measures.*

### **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 continue to implement 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.

**Planning Actions Expected:** In responding to narrative questions each local business plan is expected to describe job seeker strategies within the context of 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 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 area's strategies to expand and improve service integration with the One-Stop Career Center system to unique populations in the context of universal access, for example, cross-training of staff, issues around supervision and management of Career Center partner staff, regional strategies to serve special populations, 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 through initiatives such as ECCLI, NUCLI, BayStateWorks, Workforce Training Fund, Hiring Incentive Training Grant

etc. It is critical that the public workforce system, coordinated through the One-Stop Career Centers, 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.

**Planning Actions Expected:** The primary goals for FY 2007 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 FY 2007 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:** Local workforce investment boards and their youth councils need to consider several factors as they continue to implement enhancements to Title I Youth Services and develop a continuum of services for youth in the region.

- In 2004, USDOL issued TEGL No. 03-04, outlining a “New Strategic Vision for the Delivery of Youth Services under the Workforce Investment Act (WIA)”. USDOL’s new vision seeks to improve outcomes for the most vulnerable youth; focus on improved program performance; address the labor market and business needs; and connect youth with alternative education. The strategic vision continues to be emphasized by several federal programs that support different youth services.
- Congress is still considering WIA reauthorization. Although any changes would not take effect during FY 2007, Workforce Investment Boards should be aware of the likely direction of statutory changes in youth service priorities, in the mix of youth service elements, and a shift to new performance measures. One major expected change in youth services is a higher priority for serving *out-of-school* youth. Some Workforce Investment Boards are already in the process of working with youth service vendors and changing priority youth populations to avoid having to make abrupt changes in the following year.
- New federal “Common Performance Measures” are already in place that require boards to begin reporting on three new program performance measures in addition to the seven required statutory measures. To provide stronger outcomes consistent with the new measures, boards and youth councils need to place a higher priority on specific youth outcomes such as placement in employment or education, attainment of a degree or skill certificate, and literacy or numeracy skill gains.
- The Commonwealth of Massachusetts established *Pathways to Success by 21 (P-21)* as a multi-agency effort designed to create a better alignment of youth services and youth policy. 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 information learned through the P-21 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 FY 2007 Business Plan.

- The Massachusetts WIA Title I Youth program improved performance overall between FY 2004 and FY 2005, and the Commonwealth continues to emphasize improvements in youth outcomes as a result of WIA investments. In the context of greater performance and improved data reporting, there needs to be continued strengthening of oversight systems by the LWIBs, and clear procedures to ensure timeliness, accuracy, and completeness of data reporting and entry – including readily identifiable source data in client files.

**Planning Actions Expected:** Workforce Investment Boards, Youth Councils, Title I Administrators and OSCCs will be expected to continue to engage their communities around the *P-21 Initiative* activities to implement their P21 Strategic Action Plan. 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 WIA Title I youth services in the annual FY 2007 Business Plan.

In addition, Workforce Boards, Youth Councils, One-Stop Career Centers and community partners need to prepare for changes resulting from WIA re-authorization and the implementation of Youth Common Measures. 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 a shift in target population. In addition, local partners must put greater emphasis on the performance of programs for youth. Local areas that completed a Corrective Action Plan to address WIA Youth Measures should reference this information in the Business Plan.

#### 4. Performance and Accountability

**Background:** Over the FY 2005 and FY 2006 planning cycles, greater emphasis was placed on performance and accountability for workforce development programs at the state level. State partners have been working with local areas on strategies to boost performance through one-on-one visits and various workshops. DCS developed quarterly reports and new “canned” crystal reports to review participant data to ensure stronger outcome information. These new tools and other strategies to connect program design and performance outcomes have been presented in FY 2006 through several statewide workshops on WIA and Wagner-Peyser performance, both youth and adult, jointly sponsored by DCS and CommCorp.

As discussed at several Workforce Partners’ Meetings and in the FY 2005 Annual Report to USDOL-ETA, the Commonwealth of Massachusetts’ FY 2005 WIA Title I statewide performance results were much improved over FY 2004. All performance goals were met or exceeded, and there was an increase in actual performance for 15 of 17 performance measures. Several local workforce investment areas qualified for incentive awards, compared to only one or two areas in the past few years. At the same time, several local areas continue to struggle with specific measures. The FY 2005 performance results for individual workforce investment areas were included in WIA Communication 05-77: FY 2005 WIA Title I Annual Performance issued on October 7, 2005. It is critical to review local area performance with all partners during the preparation of the FY 2007 Business Plan.

**Planning Actions Expected:** For the FY 2007 Workforce Development Business Plan, each area is expected to align regional WIA Title I performance standards with the state performance standards approved by USDOL/ETA for FY 2007. FY 2007 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 FY 2007 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. *NOTE: Question number three (3) on youth service strategies includes several sub-questions related to specific youth performance issues since these measures were difficult as a whole for the state.*

## **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 2007 Workforce Development Business Plan. The analysis should include a clear description of each of the following elements:

- The current industry employment trends, with an emphasis on the identification of industries experiencing either major growth or decline.
- The projected industry and occupational employment opportunities for local job seekers.
- The job skills and training requirements necessary for employment in locally targeted industries and occupations.
- 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 2007 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)

The DCS Economic Analysis Office provides general labor market information for local areas in an on-line format. Instructions for accessing web-based labor market information were previously provided in WIA Communication Information Issuance No. 04-13 (February 25, 2004). For purposes of the FY 2007 planning process, additional local labor market information (in hard copy form) that includes local data analysis will also be mailed to each Local Workforce Investment Board within the next several weeks. Labor market economists from the DCS Economic Analysis Office 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 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 all of the region's responses in the FY 2007 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.

The response to each of the following questions should be detailed to address all of the content areas and questions contained within.

**1. Please describe the local area's overarching initiatives/objectives for providing services to job seekers for FY 2007?**

- a. The response should focus on efforts to be primarily funded through the local area's general FY 2007 allocation, but should also describe the status/progress made on the jobseeker initiatives cited in the FY 2006 Plan and how the planned FY 2007 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 FY 2007 job seeker 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 FY 2007 job seeker initiatives/objectives.

**2. Please describe the local area's overarching initiatives/objectives for providing services to employers for FY 2007?**

- a. The response should describe the status/progress made on the employer initiatives cited in the FY 2006 Plan and how the planned FY 2007 focus builds on the prior year's efforts. Include a comprehensive description of how employer services are supported by various resources and staffing available in the region. 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 FY 2007 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 FY 2007 employer initiatives/objectives.

**3 Please describe the local area's overarching initiatives/objectives for providing services to youth for FY 2007? Please include in the description new program connections, activities, or system reforms, if any, that will be implemented in your local area based on the federal new vision for youth services, the Massachusetts's Pathways to Success by 21 (P-21) planning initiative, or other youth efforts occurring in your region?**

The response should describe how youth-serving organizations and community-based organizations (WIA and non-WIA funded) are networked within the area's workforce development system as leveraged resources for outreach, support services and follow-up for youth program participants. Please reference Pathways to Success by 21 and other strategic planning actions that have supported this activity.

- a. For FY 2007 what are your area's primary priorities and strategies for managing and improving performance and access to the WIA Title I youth services?

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 required to address the unique needs of the priority population(s).

For local areas that have failed one or more performance measures in FY 2006, what steps will be taken to ensure continuation of performance improvement or corrective action plan (see Question 5.b, below)?

- b. For FY 2007 identify the specific actions your board will take to implement the Common Measures for youth.
  - 1) Do you anticipate changing the priority targeted population(s) – i.e., younger v. older youth, in-school v. out-of-school youth? Have these changes affected your process for selecting youth service providers, or in the mix of service elements that you need to deliver?
  - 2) What do you anticipate will be the major barriers/challenges to implementing common measures? What, if any, specific technical assistance will you require from the Commonwealth of Massachusetts?
  - 3) What is your local strategy for ensuring that WIA youth programs will lead to postsecondary education, advanced training, or employment outcomes?
  - 4) Based on your local labor market needs, what specific occupational or technical skill credentials will your youth program emphasize? How are you working with your youth service providers to ensure that their training or services are aligned with these skill credentials?

- 5) Regarding the Literacy and Numeracy measure, which of the approved National Reporting System assessment instruments will be used to conduct pre-tests and post-tests for out-of-school youth who are basic skill deficient? How are you working with your framework service provider to ensure the appropriate assessment, development of an ISS, and referral to a WIA youth service provider? How are you working with your youth service providers to ensure the provision of appropriate services that will yield a greater likelihood of a positive skill gain?
- 6) How is your board working with the framework service provider and with youth service providers to ensure the timely transmission of data regarding youth services to determine exit dates, service delivery, outcomes, and the timing of follow-up services?
- 7) Have you revised your existing youth contracts or youth RFP(s) to reflect the new common performance measures, emphasize the need to focus on the three new performance outcomes, and ensure that youth service providers are reporting timely management and performance information?

**4. Please describe how the local area will allocate training funds and resources in FY 2007 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 versus training funds.
- 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. Please refer to decisions to prioritize funding for certain populations, spending caps, etc.

**5. What specific continuous improvement initiatives are planned by all local partners in FY07 to strengthen the operation of the One-Stop Career Center(s)?**

- a. The response should describe specific quality/process improvement projects planned by the local partners to promote improvement in local service delivery for FY 2007 and should include a discussion of gains realized 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 quality/process 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 2007 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 2005 please describe the specific activities undertaken in FY 2006 and those planned for FY 2007 to assure improvement of performance on the goals not met in FY 2005. *NOTE: for performance issues on youth measures, you may reference any detailed responses in the previous information contained in Question 3.*

## **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. SERVICES TO MIGRANT AND SEASONAL FARMWORKERS (MSFWs)**

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 – AGRICULTURAL and 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 Parts 655 and 656) will assist DCS to determine the availability of U.S. workers and the potential adverse effect on wages and working conditions that the admission of foreign workers might have on similarly employed U.S. workers, and agrees to assist job seekers to comply with the requirement of facilitating resumes to the Employer or their representative. OSCCs may also assist in forwarding two resumes to the DCS Special Programs /Alien Labor Certification unit for consideration of job seekers qualifications with regard to a specified employer job order. With regards to the agricultural activities under the Alien Labor Certification program OSCCs agree to facilitate the referral of qualified job seekers and to assist employers throughout the recruitment process. OSCCs can not process any ALC job order that have not met the prevailing wage, issued by DCS. 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 assist in determining the eligibility of interested customers as members of targeted groups; and assist interested customers and employers to complete related documentation including IRS Form 8850 Work Opportunity Credit Pre-screening Notice and Certification Request, and DOL Form ETA-9061 (Individual Characteristics Form) or 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 customer 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 (TAA) program. The Board also assures that local One-Stop Career Center operators will conform to all policies and regulations of 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 provide in conjunction with the Section 30 and/or TAA programs. The Board also assures that local One-Stop Career Center operators will cooperate with any Hearings requirements related to UI, Section 30 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 §658.400-418 and 658.500-504 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).

### **26. RAPID RESPONSE SERVICES**

The Board assures that local One-Stop Career Center operators and other workforce development staff will coordinate/support Rapid Response service delivery with the Division of Career Services Central Rapid Response team in accordance with established policy and procedure as articulated in Policy Issuance No. 00-28 (6/28/2000), WIA Communication No. 03-29 (11/25/2003) and WIA Communication No. 04-39 (5/18/2004).

**The FY 2007 Annual Workforce Development Business Plan Instructions include the following Attachments:**

<b>A</b>	Career Center Hours of Operations Form
<b>B</b>	MOU Activity Summary Form
<b>C</b>	LWIB Contact Information Form
<b>D</b>	Duration and Principal Signatories Form
<b>E</b>	Planning Package Checklist
<b>F</b>	Program Summaries and Performance Goals Charts
<b>G</b>	Performance Measures and Goals Narrative
<b>H</b>	Integrated Budget Summary Form
<b>I</b>	FY 2007 Integrated Budget Instructions
<b>J</b>	FY 2007 WIA Title I Youth Program Budget Form
<b>K</b>	Principal Signatories Authorization to Sign Integrated Budget Modifications Form
<b>L</b>	Integrated Budget Program List
<b>M</b>	Facilities Lease Costs
<b>N</b>	Premises Related Capital Expenditures
<b>O</b>	Career Center Telephone Costs
<b>P</b>	Data Circuit Costs
<b>Q</b>	Copier Costs
<b>R</b>	FAX Costs
<b>S</b>	Postage Costs
<b>T</b>	Confidential Material Costs
<b>U</b>	Recommended PC Specifications
<b>V</b>	Title I Allocations*
<b>W1</b>	Wagner-Peyser 90% Allocations*
<b>W2</b>	Wagner-Peyser 10% Allocations*
<b>W3</b>	Wagner-Peyser 90% & 10% Carry-Over Amounts*
<b>X</b>	MOSES Allocations*
<b>Y</b>	LWIB Allocations Compared*
<b>Z</b>	State One-Stop Allocations*

**\* Will be posted upon availability**