

Rhode Island Local Plan Guidance Letter

The Governor's Workforce Board

2017

Section 1: Strategic Planning

This section should include a description of the strategic planning elements consisting of –

(A) An analysis of the regional economic conditions including existing and emerging in-demand industry sectors and occupations; and the employment needs of businesses in those industry sectors and occupations. The analysis should identify local priority industries based on employer (and WIOA partner) input. This section should align with the industries and businesses reported on in the state plan, as well as the industry clusters outlined in the Brookings Institute/Monitor Deloitte/Battelle Tech Partnership study "Rhode Island Innovates".

(B) An analysis of the knowledge and skills needed to meet the employment needs of the businesses in the Local Area, including employment needs in in-demand industry sectors and occupations.

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

(D) An analysis of the workforce development activities for the Adult, Dislocated Worker, and Youth Programs in the Local Area, including an analysis of the strengths and weaknesses of such services, and the capacity to provide such services, to address the identified education and skill needs of the workforce and the employment needs of employers in the Local Area.

(E) A description of the Local Board's strategic vision and goals for preparing an educated and skilled workforce (including youth and individuals with barriers to employment), including goals relating to the performance accountability measures based on primary indicators of performance described in Section 116(b)(2)(A) of WIOA in order to support Local Area economic growth and economic self-sufficiency

(F) Taking into account analyses described in subparagraphs (A) through (D), a strategy to work with the entities that carry out the core programs to align resources available to the Local Area, to achieve the strategic vision and goals of the State.

Section 2: Alignment of the Local Workforce Development System.

LWDB Local Plans should align with the elements laid out in the state plan. These strategic elements are:

- Implementing a demand-driven sector-based strategy to aggregate economic opportunities by employers and their intermediaries
- A career pathway strategy to provide employment, education, training and support services for individuals, particularly those with barriers to employment, so they can improve own individual capacity to effectively compete in the labor market to achieve economic security for themselves and their families.
- Develop an effective performance measurement strategy to track labor market interactions beyond federal reporting requirements

Provide Responses to the following that align with the strategies above:

(A) A description of the workforce development system in the Local Area that identifies the programs that are included in that system and how the Local Board will work with the entities carrying out workforce development core programs identified in the State Plan. The description should also include how the Local Board and the programs identified plan to align and integrate to provide services to customers. The description should also include programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.);

(B) A description of how the Local Board, working with the entities identified in A, will expand access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment, including how the Local Board will facilitate the development of career pathways and co-enrollment, as appropriate, and improve access to activities leading to a recognized postsecondary credential (including a credential that is an industry recognized certificate or certification.) Specific examples of how core programs will be aligned in the local area should be included.

(C) A description of the steps taken by the Local Board to engage entities identified in A in the formulation of its Local Plan. Local areas should include information on how Real Jobs Rhode Island partnerships were engaged in the planning process.

(D) A description of the strategies and services that will be used in the Local Area— To facilitate engagement of businesses, including small businesses and businesses in in-demand industry sectors and occupations, in workforce development programs to support a local workforce development system that meets the needs of businesses in the Local Area to better coordinate workforce development programs and economic development, including activities aligned with Real Jobs Rhode Island.

(E) A description regarding the implementation or coordination of initiatives such as Real Jobs Rhode Island, apprenticeship, incumbent worker training programs, on-the-job training programs, customized training programs, industry and sector strategies, integrated education and training, career pathways initiatives, utilization of effective business intermediaries, and other business services and strategies, designed to meet the needs of businesses in support of the strategy described in Section 1.

(F) A description of how the Local Board will coordinate workforce development activities carried out in the Local Area with economic development activities carried out in the Local Area in which the Local Area is located, and promote entrepreneurial skills training and microenterprise services. Additionally, local areas should describe how future activities will align with statewide initiatives such as Real Jobs Rhode Island.

(G) A description of how the Local Board will leverage and coordinate supportive services in the delivery of workforce development activities carried out in the Local Area. Specifically, the Local Plan should address how the Local Board will work with WIOA core partners including Vocational Rehabilitation, Adult Education and TANF, as well as any other optional partner outlined in the RI WIOA state plan

(H) A description of how the Local Board intend to provide a greater business voice in the delivery of workforce development activities carried out in the Local Area. The description should include how the Local Board will engage businesses on decisions regarding the type and content of training activities;

(I) A description of how the Local Board will promote and align with industry-led partnerships, such as Real Jobs Rhode Island, in the delivery of workforce training opportunities

(J) The representative responsible for the disbursement of grant and contract funds as described in WIOA Section 107(d)(12)(B)(i)(iii)

(K) A description of negotiated performance measures

(L) A description of the actions of the local board will take to remain a high performance board in order to remain an active local area. Include prior performance strengths and weaknesses and the areas of improvement.

(M) A description of the process used by the local board to provide an opportunity for public comment, including comments by representatives of business and comment by representatives of labor organizations, and input into the development of the local plan prior to submission

(N) A Description of the methods and activities that will be utilized to align and coordinate activities in order to streamline delivery with other LWDBs within the state. This should include an identification of possible areas of collaboration and alignment.

Section 3 – American Job Center Delivery System

This Section should include a description of the American Job Center delivery system in the Local Area, including-

(A) List the American Job Centers in your Local Area, including address and phone numbers. Indicate the One-Stop Operator for each site and whether it is a comprehensive or satellite center.

(B) Customer Flow System - Describe or show the customer flow process used in the Local Area. This description should include eligibility assessment, individualized training plans and case management.

(C) Describe how the Local Board will ensure meaningful access to all customers including expansion of technological accessibility.

(D) A description on the process the Local Board intends to provide for the solicitation and selection of a One-Stop Operator and the delivery of WIOA Title IB services as identified in Section 107 of WIOA.

(E) A description of how the Local Board will ensure the continuous improvement of eligible providers of services through the system and ensure that such providers meet the employment needs of local businesses, and workers and jobseekers;

(F) A description of how the Local Board will facilitate access to services provided through the American Job Center delivery system, including in remote areas, through the use of technology and through other means;

(G) A description of how entities within the American Job Center delivery system, including American Job Center operators and the American Job Center partners, will comply with Section 188 of WIOA, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing the needs of individuals with disabilities;

(H) An acknowledgment that the Local Board understands that, while Section 188 of WIOA ensure equal opportunity for individuals with disabilities, sub-recipients may also be subject to the requirements of:

- a. Section 504 of the Rehabilitation Act, which prohibits discrimination against individuals with disabilities by recipients of Federal financial assistance;
- b. Title I of the ADA, which prohibits discrimination in employment based on disability;
- c. Title II of the ADA, which prohibits State and local governments from discriminating on the basis of disability;
- d. Section 427 of the General Education Provisions Act; and
- e. Rhode Island Anti-Discrimination laws;

(I) A description of the roles and resource contributions of the American Job Center partners;

(J) A description of how the Local Board will use Individualized Training Accounts based on high demand, difficult to fill positions identified within local priority industries identified in Section 1(A); and,

(K) A description of how the Local Board will provide priority of service that conforms to the State Plan. This should include a description of additional local requirements or discretionary priorities including data to support the need and how the local requirement and/or priority will be documented and implemented for the Adult program

(L) A description of how the Local Board will utilize funding to create incumbent worker training opportunities

(M) A description of how the Local Board will train and equip staff to provide quality training while being WIOA Compliant.

(N) A description of how the local board will coordinate between the provision of WIOA title 1 programs and title 2 programs in addition to reviewing applications of youth providers

(O) The competitive process to be used to award grants and contracts to sub recipients

(P) Provide the safeguards that will be implemented that will ensure universal access and equitable intake processes that will include all populations in services and programs, especially those individuals with significant barriers to training and employment

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

This Section should include –

(A) A description and assessment of the type and availability of adult and dislocated worker employment and training activities in the Local Area;

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

(C) A description of how the Local Board will coordinate workforce development activities carried out in the Local Area with statewide rapid response activities, as described in Section 134(a)(2)(A).

(D) A description of how the Local Board will coordinate education and workforce development activities carried out in the Local Area with relevant secondary and postsecondary education programs and activities to coordinate strategies, enhance services, and avoid duplication of services;

(E) A description of how the Local Board will coordinate workforce development activities carried out in the Local Area with the provision of transportation, including public transportation, and other appropriate supportive services in the Local Area;

(F) A description of how the Local Board will utilize Local Adult Funding, based on adult priority groups as specified in the State Plan.

(G) A description of how the Local Board will utilize Local Dislocated Worker Funding;

(H) A description of how the Local Board will interpret and document eligibility criteria for “requires additional assistance to complete an educational program or to secure or hold

employment” as set forth in the State’s Youth Policy and WIOA Sections 129(a)(1)(B)(iii)(VII) and (a)(1)(C)(iv)(VII);

(I) A description of the documentation required to demonstrate a “need for training.”

(J) A description of the steps the Local Board will take to ensure at least 20% of Youth Funds are used for work-based training activities;

(K) A description of the Local Board’s plan to serve 75%+ out of school youth and identify specific steps that have been taken to meet this new goal; and

(L) If the Local Area has contracted with youth service providers, provide a list and description of services.

(M) A description of how the Local Board will provide basic and individualized career services to customers. The description should explain how individualized career services will be coordinated across program/partners in the American Job Centers, including Vocational Rehabilitation, TANF, and Adult Education and Literacy activities. This description should specify how the Local Area will coordinate with these programs to prevent duplication and improve services to customers.

(N) Provide a description of how the local board will coordinate the WIOA Title I workforce investment activities with adult education and literacy activities under the WIOA Title II. This description shall include how the local board will carry out the review of local applications submitted under Title II consistent with the WIOA Sections 107(d)(11)(A) and (B)(i) and the WIOA Section 232

Section 5 – Wagner-Peyser Functions

This Section should include –

(A) A description of plans and strategies for, and assurances concerning, maximizing coordination of services provided by the State employment service under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) and services provided in the Local Area through the American Job Center delivery system, to improve service delivery and avoid duplication of services.

(B) A description of how the Local Board will utilize the Wagner-Peyser program to provide access to local workforce development services for Unemployment Insurance claimants

(C) If applicable, a description of how the Local Board will ensure that migrant and seasonal farm workers in its Local Area will be provided employment services.

Section 6- Vocational Rehabilitation

This section should include-

(A) A description of the replicated cooperative agreements (as defined in section 107(d)(11)) between the Local Board or other local entities described in section 101(a)(11)(B) of the Rehabilitation Act of 1973 (29 U.S.C. 721(a)(11)(B)) and the local office of a designated State

agency or designated State unit administering programs carried out under title I of such Act (29 U.S.C. 720 et seq.) (other than section 112 or part C of that title (29 U.S.C. 732, 741) and subject to section 121(f)) in accordance with section 101(a)(11) of such Act (29 U.S.C. 721(a)(11)) with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers, and other efforts at cooperation, collaboration, and coordination.

(B) A description of how individuals with disabilities will be served through the American Job Center system in the Local Area.

Section 7- Temporary Assistance for Needy Families

This Section should include-

(A) A description of the Local Board's implementation timeline and planning activities for TANF (e.g., strategies for improving customer intake, service coordination, client monitoring and tracking, targeting employment services to low-skill, low-wage workers, etc.).

(B) A description of the implementation and coordination process to enhance the provision of services to individuals on TANF that includes:

- Potential co-location of LDSS and/or WIOA Partners at AJCs or LDSS depending on the nature of local partnerships and operations
- Leverage existing financial and in-kind contributions to the WIOA system to ensure coordination of services provided by multiple programs, creating a seamless approach to delivering services
- Cross train and provide technical assistance to all WIOA Partners about TANF
- Ensure that activities are countable and tracked for the TANF Work Participation Rate (WPR)
- Access to business services and employer initiatives to attract and better serve employers by marketing joint services, minimizing the burden on employers who use the centers, and provide employer-focused services through a single point of entry rather than through all partnering programs
- Contribute and provide baseline outcomes data to the WIOA system through strategies for collecting and reporting varied program reporting requirements.

(C) A description of the LDSS representation on the Local Board to ensure that TANF expectations, roles, and responsibilities are addressed in the Local Area.

Section 8- Jobs for Veterans Grant Functions

This Section should include –

(A) A description of how the Local Board will provide priority of service to veterans and their eligible spouse

(B) A description of how the Local Board will engage Local Veterans Employment Representatives in engaging and providing services to local businesses.

Section 9– Fiscal, Performance, and Other Functions

This Section should include—

(A) An identification of the entity responsible for the disbursement of grant funds described in section 107(d)(12)(B)(i)(III), as determined by the chief elected official or the Governor under section 107(d)(12)(B)(i)

(B) A description of financial sustainability of the American Job Center services with current funding levels, and a description of the ability to make adjustments should funding levels change.

(C) A description of the competitive process to be used to award the sub grants and contracts in the Local Area for activities carried out under this title, including risk assessment of potential sub grantees and contractors;

(D) A description of the local levels of performance negotiated with the Governor and chief elected official pursuant to section 116(c), to be used to measure the performance of the Local Area and to be used by the Local Board for measuring the performance of the local fiscal agent (where appropriate), eligible providers under subtitle B, and the American Job Center delivery system, in the Local Area;

(E) A description of the actions the Local Board will take toward becoming or remaining a high performing board, consistent with the factors developed by the State board pursuant to Section 101(d)(6); This should include a description of the process used by the Local Board to review and evaluate performance of the local American Job Center(s) and the One-Stop Operator.

(F) A description, including a copy of, of the Local Area’s Individual Training Account policy. The description should include information such as selection process, dollar limits, duration, etc.

(G) A description of how training services under chapter 3 of subtitle B will be provided in accordance with Section 134(c)(3)(G), including, if contracts for the training services will be used, how the use of such contracts will be coordinated with the use of individual training accounts under that chapter and how the Local Board will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided;

(H) A description of the Local Board’s procedures for conducting oversight and monitoring of its WIOA activities and those of its subgrantee and contractors. The monitoring plan shall address the monitoring scope and frequency and shall include the following:

- The roles and responsibility of staff in facilitating this procedure;
- A requirement that all subgrantee agreements and contracts be monitored at least annually;
- Procedures for determining that expenditures have been made against the cost categories and within the cost limitations specified in the Act and WIOA regulations;
- Procedures for determining compliance with other provisions of the Act and regulations and other applicable laws and regulations, including the method of monitoring to be used for subgrantees and contractors;

- Provisions for the recording of findings made by the recipients' monitor(s), the forwarding of such findings to the subgrantee or contractor for response and the recording of all corrective actions;
- Provisions of technical assistance as necessary and appropriate; and
- Specific local policies developed by the Local Board for oversight of the American Job Center system, youth activities and employment and training activities under Title I of WIOA

(I) A description of the Local Board's policy and procedures regarding the handling of personally identifiable and confidential information

(J) A description of the Local Board's procedures for handling grievances and complaints from participants and other interested parties affected by the local American Job Center system, including partners and service providers. Provide a separate description for the following:

- Complaints alleging discrimination on the ground of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and for beneficiaries only, citizenship or participation in any WIOA Title I – financially assisted program or activity;
- Complaints and grievances not alleging illegal forms of discrimination. This includes grievances from individuals alleging labor standards violations.
- Remedies that may be imposed for a violation of any requirement under WIOA Title I, limited to, suspension or termination of payments under the title; prohibition of placement of a participant with an employer that has violated any requirement under WIOA Title I; reinstatement of an employee, payment of lost wages and benefits, and reestablishment of other relevant terms, conditions, and privileges of employment (where applicable); and other equitable relief as appropriate.

(K) A description of the Local Board's policy and procedures with regard to aid, benefits, services, training, and employment, include a statement of assurance that you will provide reasonable accommodation to qualified individuals with disabilities.

(L) A description of the Local Board's policy and procedures in place to ensure that communications with individuals with disabilities, including individuals with visual or hearing impairments, are as effective as communications with others.

(M) A description of the steps the Local Board will take to meet the language needs of limited English speaking individuals who seek services or information. The description should include how the Local Board proposes that information will be disseminated to limited-English speaking individuals.

(N) A description of the Local Board's procurement system, including a statement of assurance that the procedures conform to the standards in DOL regulations set forth in 29 CFR Part 95, Part 97 and 2 CFR 200.

(O) A description of any documentation to demonstrate that the acquisition, management, and disposition of property adhere to the Property Management Procedures taken from DOL regulations 29 CFR Part 97 and 29 CFR Part 95.

(P) A description of any policies or procedures the Local Board adopted to avoid conflicts of interest or the appearance of such conflicts in the exercise of their responsibilities, particularly those related to the awarding of contracts.

(Q) A description of the Local Board or fiscal agent's accounting procedures, including the procedures used in preparing reports to the State. In addition to the requirement that all financial transactions be conducted in compliance with Generally Accepted Accounting Principles (GAAP), the fiscal management system must include the following in the accounting procedures.

(R) Provide a brief description of the following:

- Fiscal reporting system
- Obligation control system
- ITA payment system
- Chart of account system
- Accounts payable system
- Staff payroll system
- Participant payroll system
- Participant stipend payment system

(S) A description of the Local Board's cost allocation procedures including:

- Identification of different cost pools
- Procedures for distribution of staff costs between cost categories (Administrative cost, program cost and indirect cost).
- Procedures used for distribution of funds from each cost pool.
- Description of funds included in each cost pool.
- Description of cost allocation plans for American Job Centers.