

**North Carolina Instructions  
for Regional and Local  
Workforce Development Area Plans**

**Workforce Innovation and Opportunity Act**

**Program Year 2015  
July 1, 2015 – June 30, 2016**

*North Carolina Department of Commerce  
Division of Workforce Solutions  
4316 Mail Service Center  
313 Chapanoke Road, Suite 120  
Raleigh, NC 27699-4316*

# **Instructions**

## **Introduction**

Program Year 2015 marks the first year of the Workforce Innovation and Opportunity Act (WIOA). WIOA requires each workforce development board to develop and submit, in partnership with the local chief elected official, to the state a comprehensive four-year plan. The WIOA four-year plan will be effective July 1, 2016 - June 30, 2020. To facilitate a seamless transition, the N.C. Division of Workforce Solutions is issuing these instructions for a one-year local and regional plan to be reviewed and approved for the Program Year 2015 (July 1, 2015 – June 30, 2016).

The local and regional plan shall support the alignment strategy described in the state plan in accordance with WIOA Section 102(b)(1)(E), and otherwise be consistent with the state plan. Workforce Development Boards shall comply with WIOA Sections 106(c) and 108 in the preparation and submission of the plan.

## **Federal and State Requirements for Local Administration of the Workforce Innovation and Opportunity Act**

Reference the Workforce Innovation and Opportunity Act, Public Law 113-128, enacted July 22, 2014. Additional information is available at the U.S. Department of Labor Employment and Training Administration website: [www.doleta.gov](http://www.doleta.gov)

Reference the NCWorks Commission 2014-2016 Strategic Plan “Preparing North Carolina’s Workforce for Today and Tomorrow”. North Carolina policy information is available at [www.nccommerce.com/workforce/workforceprofessionals](http://www.nccommerce.com/workforce/workforceprofessionals)

## **Public Comment**

In accordance with the Workforce Innovation and Opportunity Act, Section 108(d), the workforce development board shall make copies of the proposed local plan available to the public through electronic and other means, such as public hearings and local news media; allow for public comment not later than the end of the 30 day period beginning on the date the proposed plan is made available; and, include with submission of the local plan any comments that represent disagreement with the plan.

## **Plan Submission and Due Date**

The local plan must be submitted in the Workforce Information System Enterprise (WISE) through the Administrative Adjustment process. *The due date is May 29, 2015.* Each section (A-F) and all attachments are to be uploaded as individual documents. Forms requiring original signatures may be mailed to the assigned Planner at: N.C. Division of Workforce Solutions, 4316 Mail Services Center, Raleigh, N.C. 27699-4316.

## A. Local Area Overview

- A.1. Provide the Local Area's official (legal) name as it appears on the local Consortium Agreement established to administer the Workforce Innovation and Opportunity Act (WIOA) or, if not a Consortium, in the formal request for Local Area designation. If the Local Area is a Consortium, attach a copy of the current Consortium Agreement. Name document: Local Area Name Consortium Agreement.

The Local Area's legal name is the High Country Workforce Development Board. The local consortium is the High Country Workforce Consortium. The consortium agreement is currently under review by all High Country counties and is expected to be approved in June, 2015.

- A.2. Provide the name, title, organization name, address, telephone number and e-mail address of the Workforce Development Director.

Adrian Tait, Director,  
High Country Workforce Development Board,  
468 New Market Blvd Boone, NC 28607  
828-265-5434x130  
[adrian.tait@highcountrywdb.com](mailto:adrian.tait@highcountrywdb.com)

- A.3. Provide the name, elected title, local government affiliation, address, telephone number and e-mail address of the Local Area's Chief Elected Official.

Keith Elmore, County Commissioner  
Wilkes County Board of Commissioners  
124 Old Cotton Mill Place  
Roaring River, NC 28669  
(336) 651-7346  
[keltmore@wilkescounty.net](mailto:keltmore@wilkescounty.net)

- A.4. Provide the name, title, business name, address, telephone number and e-mail address of the individual authorized to receive official mail for the Chief Elected Official, if different than A.3.

Same as above

- A.5. Provide the name, address, telephone number of the Administrative/Fiscal Agent responsible for disbursing Local Area WIOA grant funds. This is the entity responsible for the disbursement of grant funds. [WIOA Sections 107(d)(12)(B)(i)(III) and 108(b)(15)].

High Country Council of Governments  
468 New Market Boulevard  
Boone, NC 28607  
828 265-5434

- A.6. Provide the name, title, organization name, address, telephone number and e-mail address of the Administrative/Fiscal Agent's signatory official.

Dr. Michael N. (Mickey) Duvall, Executive Director  
High Country Council of Governments  
468 New Market Boulevard  
Boone, NC 28607  
Phone: 828 265-5434  
mduvall@regiond.org

- A.7. Attach a copy of the Administrative Entity/Fiscal Agent's organizational chart with an 'effective as of date'. Name document: Administrative Entity Name Organizational Chart.

See High Country Council of Governments Organizational Chart

- A.8. Provide the Administrative Entity's Data Universal Numbering System (DUNS) number and assurance that the 'System for Award Management' (SAM) status is current. Administrative Entities must register at least annually on the SAM website (<https://www.sam.gov/ccr/>) to receive Federal funding [required by Federal Acquisition Regulation (FAR) Section 4.11 and Section 52.204-7].

Duns # 136098337

- A.9. Provide the Workforce Development Board Chairperson's name, business title, business name and address, telephone number and e-mail address.

Rhonda Herman, President  
McFarland and Company, Inc.  
PO Box 733  
Jefferson, NC 28640  
336-246-4460 x.101  
rherman@mcfarlandpub.com

- A.10. Attach the Workforce Development Board's Membership List (form provided). The first block is reserved to identify the Board chairperson. Indicate all required representation and indicate if vacant. [WIOA Section 107(b)(2)]. Name document: Local Area Name WDB List.

See High Country WDB List

- A.11. Attach the Workforce Development Board By-laws including date adopted/amended. Name document: Local Area Name WDB By-laws.

Please see included a draft of the High Country WDB By-laws for the new WIOA board. These by-laws will be ratified at a July meeting and will be updated accordingly.

- A.12. Attach a copy of the Local Area's organizational chart with an 'effective as of date.' Include position titles. Name document: Local Area Name Organizational Chart.

See High Country Organizational Chart

- A.13. List the county/counties that comprise the Local Area. List the July 1, 2015 population estimates by county (ies) in the Local Area. (Reference: North Carolina State Demographics “County/State projections,” found at [www.demog.state.nc.us](http://www.demog.state.nc.us) or, if another source is used, identify source.)

<i>County</i>	<i>July 1, 2015 Population Estimates (2010 Census Data used)</i>
<i>Alleghany</i>	<i>11,173</i>
<i>Ashe</i>	<i>27,482</i>
<i>Avery</i>	<i>17,902</i>
<i>Mitchell</i>	<i>15,832</i>
<i>Watauga</i>	<i>53,314</i>
<i>Wilkes</i>	<i>70,012</i>
<i>Yancey</i>	<i>17,924</i>

- A.14. Attach a copy of the signed ‘Certification Regarding Debarment, Suspension, and other Responsibility Matters – Primary Covered Transactions’ (form provided). [Required by the Regulations implementing Executive Order 12549, Debarment and Suspension, 29 CFR Part 98, Section 98.510, participants’ responsibilities.] Document must bear the original signature of the Administrative Entity signatory official. Mail original to Division Planner. Name document: *Local Area Name Debarment Form*.

See High Country Debarment Form.

- A.15. Plan must include the Workforce Development Board and Chief Elected Official (CEO) Signatory Submission Page (form provided), bearing the original signatures of the Chief Elected Official(s) and the Workforce Development Board Chairman. Mail the signed original Signatory form to Division Planner. Include a signed copy with the submission of the Local Plan. Name document: *Local Area Name Signatory Page*.

See High Country Signatory Page

## **B. Regional Strategic Planning**

- B.1. Identify the Workforce Development Boards comprising the configuration for regional strategic planning and counties each Board serves. Provide a reference name for the regional group, if applicable.

High Country Workforce Development Board (Alleghany, Ashe, Avery, Mitchell, Watauga, Wilkes, Yancey); Region C Workforce Development Board (Cleveland, McDowell, Polk, Rutherford); and Western Piedmont Workforce Development Board (Alexander, Burke, Caldwell, Catawba) - collectively known as the Future Workforce Alliance

- B.2. Provide a brief synopsis of the region's significant accomplishments during the past year.

Over the past year, the Future Workforce Alliance (FWA) has been awarded the National Emergency Grant "Job Driven Initiative" funding to support collaboration with local community college providers and expand the scope of On-the-Job Training (OJT) throughout the 15-county FWA regional service area. As a result of this initiative, the FWA has committed to developing and executing a minimum of 96 OJT contracts throughout the FWA service area within the two year service period covered by the grant. As of April, 2015 the FWA had already surpassed more than 60 OJT contracts executed and are well on the way of exceeding the agreed upon minimum. Furthermore, the FWA has been able to leverage this initiative to collaboratively expand the scope of relationships with local training providers and businesses and continue to build upon this momentum even after the completion of this funding cycle on June 30, 2016.

### High Country:

- Moved the Wilkes Career Center to combine WIA and DWS offices into a single NCWorks Career Center
- Moved the Boone NCWorks Career Center.
- Achieved NCWorks Certification for two Tier 1, and five Tier 2 Centers
- Assisted GE plant in Ashe County with their planned expansion hiring needs
- Hosted successful Career Pathways event with representatives from all seven counties

- B.3. Describe how the regional vision aligns with the NCWorks Commission's 2014-2016 Strategic Plan "Preparing North Carolina's Workforce for Today and Tomorrow".

FWA strives to create an integrated, customer-centered, and seamless workforce system for business and jobseeker customers. This is right in line with the first objective of the NCWorks Commission Strategic Plan. Through regular (minimum monthly) collaboration, the FWA continually improves to develop consistent service definitions, business practices, and efficiencies that will allow improvement of the customer experience for both business and jobseeker customers. Furthermore, the regular regional approach offers a constant opportunity to identify best practices and replicate them in a variety of locations. The leadership at each of the three involved workforce boards (High Country, Region C, and Western Piedmont) also recognizes that committing staff and resources to ongoing education and training for staff development is essential to insuring that each team member is prepared and equipped to deliver the desired customer experience. This philosophy also is in line with NCWorks Commission strategic planning by allowing the FWA to be flexible enough to work toward a workforce that is adaptable to ever-changing needs. Finally, the FWA is committed

to expanding the recognition of the labor force throughout the service area(s) by continuing to work with counties to achieve recognition as a Certified Work Ready Community, as recognized by ACT. This initiative is one that has been and continues to be important to the FWA and it has every intention of working toward each of the 15 FWA counties achieving this designation as soon as possible. This approach is also directly in line with the NCWorks Commission Strategic Plan focusing on expanding the number of Work Ready Communities on a statewide basis.

- B.4. Provide an analysis of the regional economic conditions to include: a) existing and emerging in-demand industry sectors and occupations; and, b) knowledge and skills needed to meet the employment needs of employers in those industry sectors and occupations. Include sources used and business involvement in determining needs. [WIOA Section 108 (b)(1)(A)(i)(ii) and (B)].

The region continues to have uneven economic recovery with larger towns and areas adjacent to metropolitan areas growing more rapidly than small towns and rural counties. Manufacturing continues to be a driving force with more than 61,000 total jobs. Healthcare and retail jobs also make up a substantial portion of the overall employment. Construction, administration, transportation and warehousing, professional, scientific and technical services, along with educational services, all showed strong growth from 2012-2014.

Skill needs vary among regional industries with most industries reporting a demand for both technical skills and soft skills.

- B.5. Provide an analysis of the workforce in the region, 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 region, including individuals with barriers to employment. [WIOA Section 108 (b)(1)(C)].

See an Economic Overview of the 15-county region in the attachments.

- B.6. Describe strategies, to include the “N.C. 1,000 in 100 Initiative” teams, used to facilitate engagement of businesses and other employers, including small employers and in-demand industry sector occupations. Describe methods and services to support the workforce system in meeting employer needs. [WIOA Section 108 (b)(4)(A)(i)(ii)].

The FWA engages in regular and consistent communication in order to assess the needs of business customers and insure that service delivery is efficient. Examples of this practice include, but are not limited to the following: 1000 in 100 initiative (which included community college, WDB, DWS, economic development, and school system representation); the McDowell Pipeline committee, which engages employers on a monthly basis to develop and continuously improve training pathways and develop additional mechanisms to assist in recruitment of adequate talent (such as the creation of the McDowell Apprenticeship coalition); regular monthly business and employer team meetings to share best practices and discuss specific scenarios and case studies related to business and employer needs (this group includes BSRs LVERs, DWS staff, college business and industry staff and others); and regular engagement with various human resource and personnel associations throughout the FWA service area in order to actively observe and listen to challenges while developing customizable solutions for business customers.

- B.7. Describe strategies and services used to coordinate workforce development programs and economic development. [WIOA Section 108 (b)(4)(A)(iii)].

Each of the FWA member workforce entities regularly meets with local Economic Development entities to assess their needs, discuss projects, and provide support and encouragement related to both new recruitment efforts and to existing industries. The Certified Work Ready Community initiative has also brought both voices (business and workforce) to the table for collaboration and commitment to make sure it is a success and that goals are met on time. The FWA is completely committed to developing and maintaining relationships with Economic Development partners in order to best meet business customer needs.

- B.8. Outline regional transportation issues related to workforce development and ways the region is/will address needs identified. Include a description and/or map of the regional commuting patterns. [WIOA Section 108(b)(11)].

Most of the FWA are rural areas and local transportation is one of the biggest challenges, and in most cases mass transit does not exist; therefore, making the conversation around regional transportation a moot point at this time.

Please see the chart below for details of commuting patterns in the FWA region. The chart was compiled from data provided by NC LEAD Prosperity Zone Snapshots for the Northwest, Southwest, and Western Prosperity Zones.

County	Employed in County, Live Outside	Live in County, Employed Outside	Employed and Live in County
Alexander	4,038	9,547	4,199
Alleghany	1,320	1,758	1,414
Ashe	2,566	4,755	4,105
Avery	3,342	4,743	1,906
Burke	12,875	14,579	12,069
Caldwell	10,476	24,269	12,791
Catawba	41,053	27,011	33,462
Cleveland	15,554	26,998	15,708
McDowell	6,749	8,930	6,962
Mitchell	2,470	3,280	1,950
Polk	2,906	4,292	1,624
Rutherford	7,378	10,659	9,438
Watauga	10,063	9,774	9,303
Wilkes	8,955	13,806	11,595
Yancey	1,574	3,963	1,799



- B.9. Describe how the region coordinates with area secondary education, community colleges and universities to align strategies, enhance services and avoid duplication of services. [WIOA Section 108(b)(10)].

Each of the FWA Workforce Development Boards benefit from regular collaboration and consistent communication with local schools and community college providers. Currently there are eight community colleges in the FWA service region that are members of the N.C. Community College system (Caldwell, Catawba Valley, Cleveland, Isothermal, Mayland, McDowell Technical, Western Piedmont, and Wilkes). The prevalence of these institutions of higher learning allows the FWA providers to collaboratively work in developing training programs that support high growth occupations and in building career pathways that can support local business needs and foster growth. It also allows the FWA to regularly act as a convener to share ideas and program of instruction examples between training entities, thus ensuring that there is an effort to minimize duplication. We have engaged in ongoing communication with community college providers to build and monitor training programs for viability and effectiveness.

Furthermore the FWA remains very involved with public school officials on a regular basis recently convening schools, colleges, and career centers to discuss career pathways in the High Country. This allows for career pathway development to be targeted at specific sectors and to insure that all applicable representatives are involved in the planning and execution of building such initiatives. Regional STEM efforts, and just this past year, a multi-county effort to hold an Allied Health Career Fair, allowed for over 300 students to learn more about and further explore individual opportunities to consider and enter into the sector specific pathway. Specifically in regards to STEM efforts, there is an early stage initiative called, STEM West that is seeking support in order to mimic the STEM East alliance and provide and reap the same benefits for the western part of the state. Catawba County Schools has been the lead on this project so far, but the advisory board is made of up public and private partners.

The FWA will continue to leverage and value educational partners and stakeholders in an effort to always be developing and evolving career pathway strategies for students, jobseekers, and business customers.

- B.10. Provide details on how the region addresses workforce issues specifically related to its:  
a) cities and/or towns; b) suburban areas; and, c) rural areas.

The FWA covers a total of 15 of the 100 North Carolina counties. As a result, there is a wide range of diversity regarding socio-economic, demographic, and logistic challenges. While the majority of the FWA service area is recognized as being in rural communities, there are developing cities and towns scattered throughout the entire region. Despite these differences, the FWA is currently experiencing moderate growth in the Manufacturing, Allied Health, and Hospitality/Tourism sectors. As a result, the FWA is able to continue to identify and replicate best practices wherever possible. Examples include the creation of Work Readiness Certification training programs to address soft skills issues throughout multiple areas. The FWA also works diligently to remain engaged and active throughout the entire NCWorks Career Center system through the auspices of Integrated Service Delivery. It is through these

relationships that the FWA and associated staff can stay informed about local challenges, develop and maintain regular communication with jobseeker customers, and continuously assess and identify workforce issues in a variety of areas. The FWA workforce boards also have an advantage of knowing and understanding the cities, towns, suburban areas, and rural areas outlying workforce issues because they are housed within councils of government. Through this relationship board staff have quicker knowledge of business expansion needs from the community development block grants; housing needs from Section 8 housing; and transportation and data analysis that can assist us and other workforce partners.

- B.11. Provide details on how the region connects military skills to occupational demands to serve military veterans and families.

The FWA is committed to providing prioritized services to military veterans and their families. The FWA works closely with Local Veteran employment Representatives (LVER) as well as with Disabled Veteran's Outreach Program Specialists to insure that there is a wide variety of services available to military veterans' and their families. It is vital to the FWA to insure that local business and employer representatives are aware of a variety of Veteran related subsidies and incentives designed to encourage and accelerate the employment of military veterans.

## **C. Local Area Planning**

- C.1. Provide a description of the Workforce Development Board's strategic vision and goals for preparing an educated and skilled workforce including youth and individuals with barriers to employment. Include goals relating to the performance accountability measures based on primary indicators of performance in order to support regional economic growth and economic self-sufficiency. [WIOA Section 108 (b)(1)(E)].

*Mission: The High Country Workforce Development system helps employers meet their workforce needs, helps individuals build careers, strengthens the local economy, and meets the challenges of global competition.*

### **PY 2014-2015 Goals and Strategies**

#### **Goal 1 - Maximizing Employer Engagement**

##### **Strategies:**

1. Increase Board Member's capacity to "educate" other businesses of the workforce system and business services
2. Increase awareness of Workforce issues and services for the purpose of garnering workforce champions and being recognized as a model at local, state and federal levels
3. Convene multi-region planning initiatives with other workforce boards
4. Increase local awareness that improved skills lead to a better job

#### **Goal 2 - Improve the One Stop Delivery System**

##### **Strategies:**

1. Communication with staff and partners of the center has increased to ensure consistent delivery of services
2. Center staff participate in a regional retreat to focus on vision and goals of the center and service delivery
3. Welcome process for customers is delivered in a consistent manner by center staff

### **Goal 3 - Engage the Region's Youth**

#### **Strategies:**

1. Youth staff and service delivery are effectively integrated into NCWorks Centers
2. Work based learning opportunities for WIOA youth participants are integrated into youth service delivery with positive outcomes.

### **Goal 4 - Improve Outreach**

#### **Strategies:**

1. Increase community awareness through marketing materials and actions.
2. Improve relationship(s) with Chambers and Economic Development groups
3. Develop and implement Outreach/Awareness Plan

The High Country Workforce Development Board plans to align its strategic plan with the NCWorks Commission *2014-2016 Strategic Plan - Preparing North Carolina's Workforce for Today and Tomorrow*. The Board will need to develop a strategic vision and goals for preparing an educated and skilled workforce including youth and individuals with barriers to employment and include goals relating to the performance accountability measures based on primary indicators of performance in order to support regional economic growth and economic self-sufficiency. The alignment of the Board's strategic plan and the development of goals and performance measures will be completed during PY 2015.

- C.2. Taking into account the analyses described in the Regional Strategic Planning section, describe strategies to work with the entities that carry out the core programs that align resources available to the Local Area to achieve the strategic vision and goals described in C.1. [WIOA Section 108 (b)(1)(F)].

Over the last two years the High Country Workforce Development Board and its staff has worked diligently to develop partnerships with local and regional entities to achieve the strategic vision and goals of the board. Examples include the following:

- MOU with Avery County Schools to assist with the establishment of the Blue Ridge Academy, an alternative school to return dropouts to an alternate high school setting for completion of their High School diploma and prevent at risk students from dropping out of high school. This was combined with paid work experiences to build work history and prepare the youth for unsubsidized employment. As a result of this partnership, Avery County Schools achieved the highest high school completion rate in the state. The second year, the local United Way donated \$10,000 to be used for work experiences for youth not eligible for WIOA services.
- High Country Youth Forum, hosted by the HCWDB, was held in August 2013, which resulted in the Grade 8 Program being established in Avery County and was carried out in 2014 and 2015 in partnership with Avery County Schools. This initiative

resulted in all Avery County 8th graders participating in a day of career exploration outside the school environment, prior to attending high school. This initiative has now been in place for two years.

- Through an NCWorks initiative, the HCWDB has been an integral partner with Wilkes Community College, the Ashe County NCWorks Career Center, Ashe County Chamber of Commerce, and Ashe County Economic Development in efforts to assist GE Aviation expand their workforce. The planned expansion is for a total of 102 jobs in rural Ashe County. In December 2014, a job fair for GE was held on the WCC campus in Ashe County, and over 300 potential job applicants attended.
- As a side note, Southern Industrial Constructors is a subcontractor within the GE Aviation facility and maintains all the equipment within the plant. They have had five small incumbent worker grants since GE began operations in Ashe County, and they have expanded their workforce from seven to fourteen employees expecting to grow to 28 employees by the time the GE expansion is complete.
- In partnership with EDCs and community colleges, the WDB has convened and supported the Work Ready Communities initiative. Currently three of the seven counties in the region (Ashe, Watauga, and Wilkes) are working towards their two year goals.
- The WDB continues to work with local area schools regarding Career Pathways. In March 2015 the WDB convened a regional Career Pathways meeting with local schools, community colleges, and DPI to highlight and share best practices regarding CTE and Career Pathway programs in the region. Feedback from this meeting indicated it to be a worthwhile session.

- C.3. Describe Local Area's workforce development system, including identifying the programs included in the system, and how the Workforce Development Board will work with the entities administering core programs and other workforce development programs to support alignment and provision of services, including programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.). [WIOA Section 108 (b)(2)].

The WDB continues to partner and build on relationships established with NCWorks partners, secondary schools, community colleges, etc. to support the in-demand training needs of students and employers. Efforts include involvement with Avery/Mitchell/Yancey Healthcare Pathways development; participation in various industry groups such as BIEF (Business and Industry Education Forum); collaboration on Career Pathways efforts throughout the region presented by CTE staff; and participation in secondary school events such as career fairs and various projects by NCWorks staff. This past year, CTE staff have been very engaged in Youth Council meetings and events. Also in development is a partnership with Appalachian State University to provide a data analysis of workforce system information.

Due to the rural nature of High Country Communities and the variety of staffing and office resources available from partners, each NCWorks Career Center has a unique set of relationships between partners. Board and career center staff are always looking for additional ways to partner and provide more seamless services to customers.

- C.4. Provide a description of how the Workforce Development Board, working with the entities carrying out core programs, will expand access to employment, training,

education and supportive services for eligible individuals, particularly eligible individuals with barriers to employment. Include how the Workforce Development Board will facilitate the development of career pathways and co-enrollment, as appropriate, in core programs, and improve access to activities leading to a recognized postsecondary credential including a credential that is an industry-recognized certificate or certification, portable, and stackable. [WIOA Section 108 (b)(3)].

High Country Workforce Development Board has started a dialogue process with Adult Basic Education services within our local community colleges to increase partnering to serve those that have low basic skills so they may pursue additional educational opportunities and/or enter the workforce. Locally, the WDB is partnering closely with the local K-12 school systems, especially with superintendents, high school principals, and CTE staff. Historically, the WDB has partnered with the local community action agencies for the purpose of targeting low income individuals for skill upgrading and placement into employment. It is anticipated that this partnership will increase to achieve the goals of reaching this population. Locally Board and career center partnerships with local Vocational Rehabilitation staff have been close, often resulting in dual enrollments to meet customer needs. It is expected these relationships will continue and strengthen with implementation of WIOA services.

- C.5. Describe the Workforce Development Board's use of initiatives such as incumbent worker training programs, on-the-job training programs, customized training programs, industry and sector strategies, career pathways initiatives, utilization of effective business intermediaries, and other business services and strategies, designed to meet the needs of employers in the corresponding region in support of the regional strategy to meet the needs of businesses. [WIOA Section 108 (b)(4)(B)].

The High Country Workforce Development Board and its NCWorks centers utilize a number of strategies and initiatives to meet the needs of employers within the seven-county workforce area. The 1000 in 100 initiative last fall set the stage for implementing a unified local/regional approach to meeting the needs of businesses. The wealth of data from that initiative will help to guide plans for business services. This could not have happened at a better time.

Over the last 18 months, six incumbent worker grant applications have been approved for funding. These projects have included training in health care, advanced manufacturing, green building and energy efficiency, HVAC, and spray foam insulation techniques for residential and commercial buildings. Since incumbent worker training began across North Carolina, this training has impacted nearly 50 local businesses in the High Country and provided well over \$1,000,000 in training funds to prevent layoffs and closures and to meet skills gaps that exist within the local workforce.

The HCWDB has been a leader in using On-The-Job Training (OJT) to meet business needs. The Board has been very proactive in securing additional funds to provide OJTs including the OJT National Emergency Grant that began in 2010, Statewide OJT Initiative Funds, and most recently the Job Driven National Emergency Grant. These efforts assisted local employers meet their workforce needs and resulted in over 125 individuals obtaining needed employment.

The HCWDB has been involved in developing and promoting career pathways for several years. As local schools went through the “Pathways to Prosperity” initiative, board staff were involved in convening employer meetings to understand industry needs and foster communication between schools, colleges, and businesses. The board staff continue to be involved providing LMI to assist with targeting efforts and attending career pathway group meetings across the region.

Career pathway efforts continue to grow in the High Country Local Area with the recent meeting of regional schools, colleges, and career centers to showcase the great efforts underway. Each local school presented on their efforts with career pathways in order to share best practices and develop new strategies. These efforts will continue in PY2015.

The Board is very much interested in developing full-fledged industry sector strategies. To date, staff have met with Vail Carter, the BSR from Centralina WDB, to discuss their efforts. The Workforce Operations Director attended the Sector Strategies Forum in Atlanta last November. It is expected that some initial organizational meetings will be held around identified sectors during the next year.

- C.6. Describe how the Workforce Development Board coordinates and promotes entrepreneurial skills training and microenterprise services. [WIOA Section 108 (b)(5)].

These trainings are offered by a variety of organizations in our area. Local community colleges, Appalachian State University, SBTDC, Ascent Business Network, and others offer this training. The career centers refer interested customers to these services in addition to hosting some of the workshops on-site at the career centers.

- C.7. Describe how the Workforce Development Board enhances the use of apprenticeships to support the regional economy and individuals’ career advancement.

Apprenticeships, as part of work-based learning, can be an important part of connecting people to jobs. In the past there have been limited apprenticeship activities in the High Country area. Board staff plan to develop that relationship with regional apprenticeship staff, cross train business service team members, and set regional goals for apprenticeship.

- C.8. Provide a description of how the Workforce Development Board coordinates workforce investment activities carried out in the Local Area with statewide rapid response activities as described in WIOA Section 134(a)(2)(A). [WIOA Section 108 (b)(8)].

Rapid Response activities continue to improve with staff from multiple agencies in attendance using the NCWorks name and referring to NCWorks Career Centers, rather than using a confusing array of program names and acronyms.

The High Country Workforce Development Director and the NCWorks Coordinator provide regional leadership for Rapid Response Activities. One of these staff members will contact the state to let state level DWS rapid response unit staff know of any layoff/closure as soon as staff are made aware of the event or announcement. If the event requires state level participation then the Director and NCWorks Coordinator work closely with the state to set up the rapid response meeting with the company and communicate this to the appropriate center staff that will need to participate in the



company meeting. Because of the long history of working with layoffs and closures, local rapid response teams are in place for each of the workforce centers to work with the company and the affected workers. Meetings with the company and with the workers typically includes High Country WDB level staff, WIOA-funded service provider staff, DWS local and regional staff, DSS staff, local community college staff, and other partner staff as appropriate. In many instances, meetings with the company and meetings with the workers will be held at the workplace. In some cases, when there is an immediate closure it is not possible to have the meeting at the workplace, an appropriate facility is secured for purposes of meeting with workers impacted or the meetings are held at the appropriate workforce center.

- C.9. Provide a description of plans, strategies and assurances concerning maximizing coordination of services provided under the Wagner-Peyser Act and services provided in the Local Area through the NCWorks Career Center system. Include how improved service delivery and avoidance of duplication of services will be achieved. [WIOA Section 108 (b)(12)].

Wagner Peyser services are tightly coordinated in the area. The two Level One certified NCWorks Career Centers are both set up as co-management arrangements, whereby WIOA and DWS staff collaboratively manage and oversee the work of all staff members in the center. Both the Level One centers (2) and the Level Two centers (5) operate using a functional approach with all staff being trained in career service delivery, referrals, resource assistance. Wagner Peyser and WIOA staff will continue coordination and integration during the program transition to avoid duplication.

- C10. Provide a description of how the Workforce Development Board coordinates workforce investment activities carried out in the Local Area with the provision of Adult Education and Literacy activities. [WIOA Section 108 (b)(13)].

Adult Education and Literacy activities have always worked together on a referral arrangement. Recent regional meetings between board, service provider, and Adult Education staff have determined additional areas where collaboration is possible to include better referrals, reviewing of regional policies, and better understanding of programs. It is anticipated this relationship will be developed further to deliver better service to shared customers.

- C.11. Provide a description of cooperative agreements, as defined in WIOA Section 107(d)(11), between the Workforce Development 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)) 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. [WIOA Section 108 (b)(14)].

The Local Area consistently emphasizes to our service providers the need to serve customers with disabilities. Past regional Career Center meetings have included short presentations, and Career Center management teams review information and videos through Vocational Rehabilitation. Historically, Career Center partners have been invited to the Equal Opportunity training held by the Local Area for service providers.

Marketing efforts are always inclusive of persons with disabilities. It is common to co-enroll customers being served through Vocational Rehabilitation to meet these customers' needs. The WDB's regional representative for Vocational Rehabilitation has served on the Board's One Stop Committee and became directly involved in many of the centers around the region. His presence and attention always raise the awareness of center staff about serving customers with disabilities. Some career centers have Vocational Rehabilitation staff on a rotating basis to assist with referrals and placements.

- C.12. Provide a description of the competitive process used to award subgrants and contracts in the Local Area for activities carried out under WIOA Title I. [WIOA Section 108 (b)(16)].

The High Country Local Area procurement policy requires that a competitive process be followed for the procurement of WIOA Adult, Dislocated Worker, Business Services, and Youth Services, except as described in the policy's non-competitive procurement section. Under WIOA, career center operation is also a competitive process.

Typically, the Board begins the process with an announcement and advertising of Intent to Bid process for Adult, Dislocated Worker, and Youth services to determine interest from organizations to provide WIOA services within the seven-county workforce area. If more than one organization submits a completed Intent to Bid response, then the Board will have the interested organizations submit a completed response to the Request for Proposal (RFP) for provision of services. RFP responses are reviewed by WDB staff and a designated RFP review committee and a recommendation is made to the Board for their consideration. The High Country Workforce Development Board's procurement policies and procedures have an appeals process that includes a process that service providers or prospective service providers may use if they have a complaint or grievance regarding the process.

- C.13. Describe methods used to track Adult, Dislocated Worker and Youth performance measures throughout Program Year 2015 and plans for continuous improvement of performance.

Performance is tracked in NCWorks Online with all staff imputing services and notes regarding service delivery. Futureworks Performance management software was recently installed and gathers NCWorks online data to provide detailed reports on performance. Futureworks will be used to develop goals and improve performance. Staff have also tried to utilize reports from NCWorks and identify areas that need attention and/or data cleanup.

- C.14. Provide a brief description of the actions the Workforce Development Board will take toward becoming or remaining a high-performing board, consistent with the factors developed by the NCWorks Commission. [WIOA Section 108 (b)(18)].

The High Country Workforce Development Board and staff look forward to understanding the factors involved in becoming or remaining a high-performing board.



- C.15. Describe the role of the Workforce Development Board in establishing Work-Ready Communities. Include a list of the designated Work-Ready Communities in the Local Area.

The HCWDB has supported the WRC initiative for several years and began implementation of the application process last fall. Ashe, Watauga, and Wilkes counties have been accepted into the program and are working toward certification. The Board plays a role by convening partner meetings, helping draft applications, providing marketing material, and informing career center staff on their role in the initiative. HCWDB staff will be working with Alleghany, Avery, Mitchell, and Yancey to determine interest and develop applications in the summer of 2015.

## **D. NCWorks Career Centers (One-Stop Delivery System)**

- D.1. Provide a brief description of the NCWorks Career Center system in the Local Area. [WIOA Section 108 (b)(6)].

In the High Country area, there are currently two (2) tier one NCWorks Career Centers in Watauga and Wilkes Counties, and five (5) tier two centers in Ashe, Alleghany, Avery, Mitchell, and Yancey counties. Each county is set up differently based on hours, staffing, partners, and lease holder. WDB staff work closely with center managers on various projects and issues on a regular basis. Career centers also work closely with HRD to provide career services and workshops and/or assessments. Please see D6 for additional details.

- D.2. Attach the Memorandum of Understanding (MOU) among the local Workforce Development Board and partners concerning operation of the NCWorks Career Center system. [WIOA Section 121(b)(A (iii))]. Name document: *Local Area NCWorks Career Center MOU*.

MOUs between the High Country Workforce Development Board and partners concerning operations of the NCWorks Centers will need to be developed after selection of the WIOA service provider(s)/center operator(s). Due to the time it has taken to get a Local WIOA Consortium Agreement in place, approved by each of the seven county commissions and signed, the RFP process had to be delayed. It is expected that the service provider(s)/one stop operator(s) will be in place by December 1, 2015.

- D.3. Describe how NCWorks Career Centers are using the integrated, technology-enabled intake and case management information system for programs carried out under WIOA and programs carried out by NCWorks Career Center partners. [WIOA Section 108 (b)(21)].

All NCWorks Career Center staff utilize NCWorks for keying of and tracking participant data and activities to include dual enrollment. All staff are trained on the system and provided technical assistance on an ongoing basis. Staff are also using the document storage features for eligibility and other program documents, and in process is the provision of electronic signature pads to the career centers.

- D.4. Describe how new NCWorks Career Center staff are trained in the integrated services delivery system and have full access to NCWorks.gov. Include methods and content of new staff training and timeline for accomplishing the training.

All staff have received training from WDB staff and/or DWS managers regarding use and expectations of NCWorks. Local super users consistently provide technical assistance to staff on a daily basis and provide guidance on changes and trouble shooting. New staff are typically trained within two weeks and often shadow other staff during use of system. WDB staff have also provided various training sessions to partners such as VR, libraries, and the housing authority. Once training has been completed, the RFA is submitted by WDB staff or DWS manager for staff access. Staff are also provided the NCWorks training site in order to practice using the system. WDB staff work closely with state staff regarding use of system.

- D.5. Describe the Workforce Development Board's method for planning oversight of the NCWorks Career Center system in the Local Area, including processes for ensuring quality customer service. Include the review/oversight process and frequency of review. [WIOA Section 121(a)(3)].

The Workforce Development Board's One-Stop Services Committee oversees the performance of the One-Stop Career Center system as a whole, including continuous improvement and customer satisfaction as well as adult services. HCWDB staff currently review monthly reports of Center traffic numbers (a basic report tallying the head count of customers entering the centers), and on occasion, customer satisfaction reports are reviewed by the HCWDB staff. The committee receives information about overall trends that appear in the aforementioned reports. The committee also takes an active role in helping resolve issues that arise from the individual centers. Documentation of the committee's oversight is included in committee meeting notes, which are distributed to all Board members.

HCWDB staff provide technical assistance to the region's One-Stop Centers through participating in management team meetings, reviewing business plans and certification applications, and providing feedback with regard to both. As new staff joins the One-Stop Centers or as management team chairs rotate, introductory training is provided. This training encompasses information on the Workforce Development Board and its One-Stop oversight role, as well as the general manner in which the region's One-Stop Centers are expected to operate and organize its management team meetings.

All staff are expected to have customer service training and provide excellent customer service.

- D.6. Identify NCWorks Career Center location(s) including Tier 1 and Tier 2 sites; on-site partners; how NCWorks Career Center operator(s) are designated; provider(s) of WIOA career services and method of selection; whether youth services provider is on-site and, if so, youth services offered. Use form provided. [WIOA Section 121 (b)(1)(A) and (b)(1)(B)]. Name document: Local Area Name Career Centers.

See High Country Career Centers chart

- D.7. Describe how career services are provided through the NCWorks Career Centers. [WIOA Section 134(c)(2)].

Career Services are provided within the welcome or talent engagement function and include a range of basic services designed to help people connect with employment quickly such as registration, job search, referrals, etc. Centers are continuing to develop workshops on interviewing, resumes, social media, and other job finding skills. All staff, including WIOA, DWS, and numerous partner agencies, serve as part of the career services teams with each being trained in foundational aspects of customer service, NCWorks Online, job search, basic labor market data, and partner programs. Strong partnerships with college Human Resource Development Programs add additional capacity to deliver career services.

- D.8. Describe how the Workforce Development Board facilitates access to services provided through the NCWorks Career Center delivery system, including remote areas, through the use of technology and through other means. [WIOA Section 108 (b)(6)(B)].

The Workforce Board has begun discussions on the use of technology for increased service delivery and in some cases, have implemented initial efforts. Technology usage can be challenging in rural areas where high speed Internet is not universally available and technology literacy levels can be low with some populations. Current efforts include training all regional library staff in the use of NCWorks Online and providing contact information easily accessible for staff. Recent efforts have also included outreach to local high schools and using school technology to register seniors for job search.

Additional ways to reach more customers across the region will continue to be developed. It is hoped that with the upcoming release of the NCWorks mobile application that this will also increase access to the local population.

- D.9. Describe Local Area strategies and services that will be used to strengthen linkages between the NCWorks Career Center system and unemployment insurance programs. [WIOA Section 108 (b)(4)(A)(iv)].

Although staff have stopped providing intensive UI claimant assistance, they have not stopped working to engage claimants with center services. Targeted services for claimants and beneficiaries are provided at Level One centers and services such as orientations are provided to all customers. A process is being developed for direct outreach to new claimants targeting them with email or direct mail NCWorks advertising prior to them receiving their letter from ESC about required visits. This effort has proven effective in the MidEast Region at getting customers into the centers and back to work more quickly.

- D.10. Describe how the Workforce Development Board uses a portion of funds available to the Local Area to maintain the NCWorks Career Center system, including payment of the infrastructure costs of Career Centers. [WIOA Section 121 (b)(1)(A)(ii) and (h)].

The Board provides resources in a variety of ways:

- Lease costs and utilities in Alleghany, Ashe, Avery, Watauga, and Yancey counties;
- Computer hardware; and
- Provides funding and staff assistance with marketing items related to NCWorks system and Career Center events.

D. 11. Describe the roles and resource contributions of the NCWorks Career Center partners. [WIOA Section 108 (b)(6)(D)].

[See High Country Career Center Analysis in the Attachments.](#)

D.12. Describe how the Local Area connects NCWorks integrated services to:

- a) persons with disabilities;
- b) returning veterans and skilled military retirees;
- c) Temporary Assistance to Needy Families (TANF) recipients;
- d) Trade Adjustment Act (TAA) and Rapid Response Activities;
- e) individuals with other barriers to employment; and
- f) additional specific populations, if applicable

Career Centers are currently engaged in various ways with partners to serve the above populations. All centers partner with VR on referrals and some share office space to assist customers with disabilities. The Watauga center is currently in the process of hiring a Veterans Specialist that will serve the entire region. Centers have outreached to TANF staff regarding partnerships and this is an ongoing effort. TAA and Rapid Response activities are closely coordinated between staff at the career centers on a daily basis to ensure that customers are dually-enrolled and receive the best service. Some centers are also reaching out and forming partnerships to serve additional individuals with barriers including those looking for work to pay child support, those that participate in Work First, as well as partnering with a local methadone clinic, and working with those formerly incarcerated.

D.13. Describe how entities within the NCWorks Career Center system, including Career Center operators and partners, will comply with Section 188, if applicable, and 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. [WIOA Section 108 (b)(6)(C)].

All centers meet basic ADA requirements for operation and have been certified as NCWorks Career Centers. Most centers also have some assistive technology available and wheel chair accessible computer stations. Vocational Rehabilitation is a close partner that can also assist with needs as necessary.

D.14. Describe the integrated customer service process for participants. Attach a flow chart for services to include initial one-on-one interviews with customers, including NCWorks.gov registration, skills assessments, and determination of further services. Name document: Local Area Name Service Flow Chart 2015.

When a customer arrives at the center, he/she is greeted by someone from the welcome team or one of the two or three staff available in the center for most of the region's centers. This initial welcome is part of the talent engagement function and is very critical to make the customer feel welcomed; to know they are dealing with a friendly professional; to be confident in the staff member's expertise and knowledge; and to know they are in the right place.

An initial assessment will be completed during this process to determine if they are a first-time customer or a returning customer, is he/she a job-seeking customer or an employer customer. Employer customers are connected with the Business Services staff.

Staff get better acquainted with the customer and their background and needs while providing an overview of available services and next steps for the customer based on their individual needs and interests. This could potentially end the first visit with something scheduled at the center in the near future or even at the time of this visit, such as an appointment with a case manager, a workshop on job search techniques or pre-employment testing for a particular employer.

If the customer is a job seeker and it is their first visit or it's been quite some time since they have been to the center, then staff assistance will include some type of orientation to the center and its services including getting the person registered in NCWorks or finding their case in the event that they have visited a center before and previously registered.

It would be optimal to have a profile completed in NCWorks at this stage but may not be realistic during this visit. This should be a goal but is not always feasible.

After completing the appropriate services within the talent engagement or welcome function, a customer can move into the talent development or training functional area or move directly to talent employment solutions, depending on their individual needs. If the customer is job-ready then the customer may potentially move directly to Employment Solutions. In a small center, all this may happen with the same staff person as opposed to larger centers where customers have a much greater potential to move around and receive services from an assortment of staff members.

For a customer that may not be job-ready or need to add skills, the next step may lead to the talent development resources. This area may include career guidance and counseling, development of an employment plan, meeting with a staff member about TAA or scholarship services, or other services available.

At the end of each visit to the center, the customer has moved closer to meeting their individual education and/or employment goals with a next step to keep them engaged. Obviously some of the goals will be to increase customer skills, increase educational obtainment, and placement into employment. The "product box" that each center develops will provide the tools and resources for customers to meet their goals. Customer satisfaction is important for the centers. As integrated service delivery evolves, the flow may change somewhat to meet continuous improvement for service delivery. The attached flow chart and listing of responsibilities by functional

unit gives a much better picture of the types of services that will be made available through the local centers within the three functional areas and how customers move through the service delivery process.

See [High Country Service Flow Chart 2015](#)

## **E. Programs**

### **Adult and Dislocated Worker Services**

- E.1. Provide an analysis of the strengths and weaknesses of existing Adult and Dislocated Worker education and training services. Include how services are provided and the capacity to address the identified education and skill needs of the workforce and the employment needs of employers. Describe plans to address any weaknesses identified. [WIOA Section 108 (b)(1)(D)].

While the High Country Workforce Area is primarily rural in nature, there are a number of training options available within commuting distances of most of the communities. However, transportation to and from training institutions is one of the most serious challenges for many customers to obtain the training and education services needed to obtain adequate employment. Locally, classroom/occupational skills training and on-the-job training are the two types of training most commonly available to customers receiving workforce services within the High Country Workforce Area. At the SETA/NCETA Conference in Greensboro, John Chamberlin described paid apprenticeships as something that has shown great success. These work-based learning opportunities are more structured than a typical youth work experience but not as structured or as lengthy as most OJTs but with an emphasis on hiring participants at the end of the training period.

For those customers that do not qualify for Pell Grants or other financial assistance, adequate funding is an issue. In PY 2014, dislocated worker funding decreased by \$387,947 from the prior year while adult funds picked up \$33,331 with an overall net loss of \$354,616. For PY 2015, final allocations reflect further fund decreases of \$90,881 to adult funds and \$152,406 to dislocated worker funds for an overall net loss of \$243,287 to adult and dislocated worker services. These decreases will impact the Local Area's ability to fund training and education services.

Except for training provided on-site by the employer usually done through OJT's, the bulk of adult and dislocated worker actual occupational skills training opportunities rest with the region's three community colleges. All sites provide curriculum, HRD, and Basic Skills opportunities for customers of all ages.

Caldwell Community College & Technical Institute serves Watauga County; however, the bulk of their skills training must be obtained at the main campus in Hudson. CCCTI continues efforts to expand training opportunities in Watauga County. Mayland Community College (MCC) serves Avery, Mitchell, and Yancey counties, while Alleghany, Ashe, and Wilkes counties are served by Wilkes

Community College (WCC). Surry Community College, McDowell Tech, AB Tech, and Western Piedmont Community College are commonly relied on for training, as well. Tennessee Tech also has nursing and allied health training that is easily accessible for North Carolina residents that live on the western side of the region.

Appalachian State University serves the region with many community college students transferring to ASU to complete degree requirements. Business, nursing, education, and industrial technology are just a few of the curricular areas designed to fill skill needs. Although not often used by WIOA participants, Lees-McRae College, a private liberal arts college located in Avery County, provides another opportunity for higher education in our region. East Tennessee State University (ETSU) offers in-state tuition for North Carolina residents of counties adjacent to the county where ETSU is located and offers much easier access for residents located on the west side of the region. They have a number of high quality healthcare related programs including nursing. Popular training options among dislocated workers have been nursing and other healthcare related fields. These training areas have often provided excellent career opportunities at high wages.

The following is a broad list of training opportunities available in the Local Area. WIOA may not provide funds for all of these areas. Because economic conditions are always changing, the Workforce Development Board has tried to take a flexible approach to training for WIOA customers, keeping in mind customer choice and local demands.

Most common training areas utilized through CCCTI include the following: nursing, truck driving, biomedical, and continuing education courses such as welding, nursing assistant, phlebotomy, and pharmacy tech.

Skills training opportunities at MCC include the following: accounting, electrical/electronics technology, electronics engineering technology, welding, nursing, auto body repair, horticulture, basic law enforcement, industrial maintenance, business administration, information systems, cosmetology, manicuring instructor, cosmetology instructor, nursing assistant, human service technology, criminal justice technology, office systems technology (with or without medical concentration), early childhood associate, aesthetics technology and esthetics technology instructor, marketing and retailing, forest management technology, computer engineering technology, medical assisting, physical therapy and physical therapy assistant, carpentry, and plumbing.

Wilkes Community College offers academic programs in the following disciplines: Arts & Sciences, Business & Public Service Technologies, Health Sciences, and Industrial Engineering. A sampling of course offerings within these divisions includes accounting, architectural technology, business administration, computer science/information systems programming, auto body repair, nursing, basic law enforcement, culinary technology, criminal justice, corrections, early childhood associate/operator, hotel and restaurant management, information systems, dental assisting, human service technology, medical assisting, speech-language pathology, automotive systems, broadcasting and production, building construction,



horticulture, industrial maintenance/controls, electronics engineering, heavy equipment and transportation technology, heating/ventilation/air conditioning, machining technology.

In an effort to train the workforce for the skills needed for future employer needs, all three community colleges have expanded their course offerings in green technology and have incorporated these skills in a number of classes. Local case managers are encouraged to utilize those course offerings, when appropriate, with their customers.

Other green training opportunities available in the area include those offered at Appalachian State University. Appalachian State University/Western North Carolina Renewable Energy Initiative and Building Performance Engineering (located in Boone) provides a wide array of nationally recognized energy conservation and energy efficiency courses with emphasis on BPI certification.

*Note: Businesses continue to be interested in their incumbent workforce obtaining more training in areas of green construction, energy efficiency and renewable energy. This has been reflected in recent incumbent worker grants submitted and approved.*

General observations over the last several years:

- Less long term curriculum training and more short term training is being provided.
- Many customers in long term training qualify for Pell Grants or other financial assistance so the Local Area is paying less actual training costs.
- More funds are being expended on supplies/tools needed within their training programs and other ancillary costs such as background checks, physicals, immunizations, drug screening, testing and test preparation costs, and licensing.

E.2. Attach the Local Area's Adult and Dislocated Worker (DW) service providers chart effective July 1, 2015. Name document: Local Area Name Adult and DW Providers 2015.

See High Country Adult and DW Providers 2015 chart



E.3. Provide the Workforce Development Board's goals for Program Year 2015 including target numbers and rationale for setting the targets:

- a) New Adult Enrollments in Training:  
**120**
- b) Estimated Adult Expenditures:  
**\$450,000 (including carryover)**
- c) New Dislocated Worker Enrollments in Training:  
**60**
- d) Estimated Dislocated Worker Expenditures:  
**\$350,000 (including carryover)**

These are reasonable goals for PY2015 because NCWorks Centers are serving many more customers with career services only. In addition, it is anticipated that some level of fund transfer will be made from dislocated worker funds to adult services, depending on actual demand. It is expected that customer numbers served will follow that shift in funding.

## Youth Services

E.4. Will the Workforce Development Board have a standing committee to provide information and to assist with planning, operational, and other issues relating to the provision of services to youth? [WIOA Section 107(b)(4)(A)(ii)].

- a. If yes, please provide the committee's purpose/vision, planning meeting schedule, and list of members to include members' agency/organization, one of which must be a community based organization with a demonstrated record of success in serving eligible youth. [WIOA Section 107(b)(4)(A)(ii)].
- b. If no, will the Workforce Development Board have a formal Youth Council or Youth Advisory group?

At this time, it is not expected that the WDB will maintain the Youth Council. It is expected that a voting WDB member to be designated as the "youth lead" to convene committees, work groups, or special meetings as needed. Generic youth issues may be discussed by the One Stop committee as progress is made towards total integrated service delivery. The current Youth Council has made great connections with local schools regarding CTE and Career Pathways, and the WDB will continue in these efforts.

E.5. Provide a description and assessment of the type and availability of youth workforce activities in the Local Area, including activities for youth who are individuals with disabilities. Include identification of successful models of such youth workforce investment activities being used and/or planned. [WIOA Section 108 (b)(9)].

The High Country region has greatly increased its partnerships with the local schools and community colleges in regards to serving youth system-wide. There have been a number of efforts related to Career Pathways such as the recent

regional Career Pathways summit, partnerships with the Wilkes County Schools BIEF (Business and Industry Education Forum), assisting with Watauga EDC's efforts in planning for expanding programs for students, holding recent county-wide REAL World events in Wilkes, assisting with planning and carrying out of Avery's Grade 8 program and Blue Ridge Academy, and Mitchell and Yancey's career days and senior NCWorks registrations. These efforts continue to grow stronger as WDB and provider staff engage with additional projects and partners.

In addition to these efforts, the region has strong connections with local training providers. Locally, classroom/occupational skills training and work experience are the two types of training available to youth customers receiving services within the High Country Workforce Area.

As funds allow, staff may set-up short term work experiences between youth and an employer that meets a participant's interest and needs in an effort to obtain work readiness skills and hands-on skill development. This type of hands-on training provides youth with a realistic view of employer expectations while being in the real world of work. Work experiences will be set up as funds allow by Cognitive Connection for Watauga County; Mayland Community College for Avery, Mitchell and Yancey; and Wilkes Community College provides this service in Alleghany, Ashe, and Wilkes counties.

The High Country region includes three community colleges: Caldwell Community College, Mayland Community College, and Wilkes Community College. All sites provide curriculum, HRD, and Basic Skills opportunities for customers of all ages.

Caldwell Community College & Technical Institute serves Watauga County; however, the bulk of their skills training must be obtained at the main campus in Hudson. CCCTI continues efforts to expand training opportunities in Watauga County. Mayland Community College (MCC) serves Avery, Mitchell, and Yancey counties, while Alleghany, Ashe, and Wilkes counties are served by Wilkes Community College (WCC). Surry Community College, McDowell Tech, AB Tech, and Western Piedmont Community College are commonly relied on for training, as well. Tennessee Tech also has nursing and allied health training that is easily accessible for North Carolina residents that live on the western side of the region.

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Skills training opportunities at MCC include the following: accounting, electrical/electronics technology, electronics engineering technology, welding, nursing, auto body repair, horticulture, basic law enforcement, industrial maintenance, business administration, information systems, cosmetology, manicuring instructor, cosmetology instructor, nursing assistant, human service technology, criminal justice technology, office systems technology (with or without medical concentration), early childhood associate, aesthetics technology and esthetics technology instructor, marketing and retailing, forest management technology, computer engineering technology, medical assisting, physical therapy and physical therapy assistant, carpentry, and plumbing.

Wilkes Community College offers academic programs in the following disciplines: Arts & Sciences, Business & Public Service Technologies, Health Sciences, and Industrial Engineering. A sampling of course offerings within these divisions includes accounting, architectural technology, business administration, computer science/information systems programming, auto body repair, nursing, basic law enforcement, culinary technology, criminal justice, corrections, early childhood associate/operator, hotel and restaurant management, information systems, dental assisting, human service technology, medical assisting, speech-language pathology, automotive systems, broadcasting and production, building construction, horticulture, industrial maintenance/controls, electronics engineering, heavy equipment and transportation technology, heating/ventilation/air conditioning, machining technology.

In an effort to train the workforce for the skills needed for future employer needs, all three community colleges have expanded their course offerings in green technology and have incorporated these skills in a number of classes. Local case managers are encouraged to utilize those course offerings, when appropriate, with their customers.

Other green training opportunities available in the area include those offered at Appalachian State University. Appalachian State University/Western North Carolina Renewable Energy Initiative and Building Performance Engineering (located in Boone) provides a wide array of nationally recognized energy conservation and energy efficiency courses with emphasis on BPI certification.

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- E.6. Provide the Workforce Development Board's approach to meeting the required:  
a) 75% minimum youth expenditures on out of school youth and include planned program design; and b) required 20% minimum for work experience. [WIOA Section 129 (a)(4)(A) and (c)(4)].

The High Country Workforce Board will require service providers to budget at least 75% of their youth funds for the provision of Out-of-School services, with a 20% minimum for work based learning opportunities, with a total expenditure goal of 80% for out of school youth. Expenditure rates and enrollments will be monitored monthly by Workforce Board Staff to insure the local area is on track to meet the required expenditure level for serving out-of-school youth.

- E.7. Describe how each of the required fourteen program elements will be made available to youth. Complete the Youth Program Elements chart on form provided. Name document: Local Area Name Youth Program Elements.

See High Country Youth Program Elements chart

- E.8. Attach the Local Area youth service providers chart, effective July 1, 2015 using the provided format. Name the document: Local Area Name Youth Providers.

See High Country Youth Providers chart

- E.9. Provide the Workforce Development Board's goals for Program Year 2015 including target numbers and rationale for setting the targets:

- a) New In-School Youth Enrollments in Training:  
**25 (including work experiences)**
- b) Estimated In-School Youth Expenditures:  
**\$100,000 (including carryover funds)**
- c) New Out-of-School Youth Enrollments in Training:  
**150 (including work experiences)**
- d) Estimated Out-of-School Expenditures:  
**\$500,000 (including carryover)**

## F. Policies

### Oversight and Monitoring

- F.1. Provide a description of the Local Area's oversight and monitoring procedures including processes for program and fiscal monitoring. [WIOA Section 107(d)(8)]. Attach a copy of monitoring document(s). Name document: Local Area Name Oversight and Monitoring PY 2015.

The Local Area conducts formal on-site monitoring visits annually. WIOA service providers receive copies of the monitoring review document(s) to use as self-monitoring and continuous improvement tools. Formal monitoring will occur sooner and more frequently where potential serious or recurring problems are identified.

Following the review, the service provider receives a written report outlining the results, including any findings. If corrective action is indicated, the report provides instructions on how to eliminate the deficiency and gives a time frame in which to do so.

The Local Area will continue to offer technical assistance in several forms. On an as-needed basis, the Local Area will host regional meetings with service providers to provide needed information and to serve as a forum where sub-recipients can request clarification on issues of concern. In addition, informal technical assistance visits will be made to NCWorks Centers throughout the year. Workforce Board staff attend staff meetings to stay abreast of service delivery. During monitoring visits, the Local Area staff will review documents and systems to determine that the sub-recipient is in compliance with applicable laws and regulations and will provide specific technical assistance where problems are identified. In addition, Local Area staff will conduct desk reviews of documents it receives and customer information documented in NCWorks to identify and address any potential problem areas.

The Workforce Development Board, through the appropriate Board Committee, establishes corrective action procedures. If required corrective action is not taken as requested, policies are invoked to include termination of contracts, if appropriate.

**See High Country Oversight and Monitoring PY 2015.**

- F.2. Provide a brief description of how the Workforce Development Board will ensure the continuous improvement of eligible providers of services and ensure that such providers meet the employment needs of local employers, workers and jobseekers. [WIOA Section 108 (b)(6)(A)].

WDB staff work closely with service providers regarding serving customers and employers. WDB staff often participate in county staff meetings and participate in planning and hosting events through the NCWorks Career Centers for both job seekers and employers. Collaboration on activities have included job fairs, employer seminars, career center processes, marketing efforts, etc. Under the WIOA transition it is expected there will be even more communication regarding service delivery and ongoing technical assistance will be provided to ensure continuous improvement of service delivery.

## Equal Opportunity

- F.3. Describe processes to ensure individuals are not discriminated against on the basis of age, disability, sex, race, color or national origin. [WIOA Section 188].

Workforce staff are made aware of expectations for maintaining non-discriminatory programs and services by the WDB staff and the administrative entity. Equal Opportunity requirements are also covered by the employing organization for new employees as part of their orientation. Customers are made aware of equal opportunity rights through placement of EO posters in each of the NCWorks Centers. Also customers enrolled into services are given an orientation which includes an overview of equal opportunity policy. As part of the orientation, a Customer Participant Rights Form is completed by the staff person with signatures from both the customer and the staff person. The customer is provided a copy of this form which explains the EO process and how to file a complaint if the customer feels they have been discriminated against. Staff are made aware of their right to file a complaint as well. This is typically done by the service provider organization or in the case of the WDB level staff by the administrative entity. Also, brochures, marketing materials, Board website, letterhead, etc. include the EO tagline. Contracts include the state mandated EO language and service provider assurances include statements regarding compliance with EO requirements.

- F.4. Attach the Local Area's current Equal Opportunity (EO) Complaint Grievance Procedure to address EO requirements [29CFR Part 37.71]. Name document: *Local Area Name EO Complaint Grievance Procedure 2015*.

[See High Country EO Complaint Grievance Procedure](#)

- F.5. Describe methods to ensure local Equal Opportunity procedures are updated.

The High Country Workforce Board staff monitors its service providers annually including their compliance with Equal Opportunity requirements. Any EO changes are noted and the MOA is updated, as needed, to reflect the changes. DWS communicates to local WDBs any changes to their Equal Opportunity Policy that may warrant changes to local Equal Opportunity Policies. WDB staff maintain the EO Posters that are posted in all our local NCWorks Centers. When any needed changes occur, WDB staff make the changes and then send the updated documents to the center managers for distribution and placement in the centers.

## Other Policies

- F.6. Provide the Workforce Development Board policy(ies) on supportive services for Adults, Dislocated Workers and Youth (i.e., amount, duration, qualifying criteria). [WIOA Section 134(d)(2)]. Name document: *Local Area Name Supportive Services Policy*.

[See High Country Supportive Services Policy](#)

- F.7. Provide the Workforce Development Board policy(ies) on Needs-Related Payments for Adults, Dislocated Workers and Youth. (i.e., amount, duration, qualifying criteria). [WIOA Section 134(d)(3)]. Name document: Local Area Name Needs-Related Payments Policy.

High Country Workforce Development Board does not currently have a Needs-Related Payments Policy and has not been providing Needs-Related Payments under WIA. If this changes, a Needs Related Policy will be drafted and submitted to DWS for approval.

- F.8. Provide the Workforce Development Board policy for local Incumbent Worker Training. The policy should include eligibility and the non-Federal share for employers. The Workforce Development Board may use not more than 20 percent of WIOA Adult and Dislocated Worker funds to pay for the federal share of the cost of training through a training program for incumbent workers. [WIOA Section 134 (d)(4)]. Name document: Local Area Name Incumbent Worker Policy.

Currently, High Country does not have a local Workforce Development Board policy for Incumbent Worker Training. Given the reductions in adult and dislocated worker funding, this will not be a high priority. If statewide Incumbent Worker funds are made available to local Workforce Areas, the WDB will plan to encourage our employer community to submit incumbent worker applications that address the training needs of their incumbent workforce.

- F.9. Provide the Workforce Development Board policy for local Transitional Jobs. The Workforce Development Board may use not more than 10 percent of Adult and Dislocated Worker funds to provide transitional jobs. [WIOA Section 134(d)(5)]. Name document: Local Area Name Transitional Jobs Plan.

Currently, High Country Workforce Development Board does not have a policy for local Transitional Jobs. The development of this policy is expected during PY2015 as additional information is received.

- F.10. Describe the Local Area's planned use of On-the-Job Training (OJT). Provide the Local Area's On-the-Job Training policy(ies). [WIOA Section 134 (c)(3)(H)]. Name document: Local Area Name OJT Policy.

High Country plans to continue providing paid On-the-Job Training (OJT) activities under WIOA. High Country is participating in the Job Driven National Emergency Grant with a goal of serving at least 32 dislocated workers in paid on the job training through the grant. That grant will continue through PY 2015.

The High Country Workforce Development Board expects that the successful bidders for their PY 2015 WIOA Request for Proposal will provide on-the-job training as part of their career services to job seeking customers and as part of their business services to employers. In recent years, each service provider has had a business service representative that was responsible for working with the business community and making paid on-the-job training available to eligible employers with case managers insuring that participants placed into OJT activities are successful in their training activities and job



retention. It is hoped that additional funding will be made available specifically for on-the-job training. Due to a second year of major cuts to formula dislocated worker funds and a drop in adult funds, it will be hard to fund a large number of on-the-job training activities through formula WIOA funds.

[See High Country OJT Policy](#)

F.11. Describe the Local Area’s process to meet priority of service requirements.

The current policy related to priority of service is specific to limited funding. It is anticipated that a revised priority of service policy will be developed in regards to WIOA priority of service expectations.

F.12 Provide the Local Area’s Individual Training Account (ITA) Policy and include the following elements in summary. [WIOA Section 108(b)(19)]. Name document: Local Area Name ITA Policy.

[See High Country ITA Policy](#)

<b>Individual Training Accounts (ITA) Summary</b>	
<b>Dollar Amounts</b>	\$8,600 per participant
<b>Time Limits</b>	Generally two years, however, longer as necessary based on training needs
<b>Degree or Certificates allowed (Associate’s, Bachelor’s, other)</b>	Generally Associate’s degrees, however, as need is identified assisting with Bachelor’s is allowed along with other diploma/certification/or licensure programs
<b>Procedures for determining case-by-case exceptions for training that may be allowed</b>	Service Providers typically make decisions on training programs for customers. However, often when questions come up or something out of the ordinary arises the service providers contact WDB staff for guidance.
<b>Period of time for which ITAs are issued (semester, school year, short term, etc.)</b>	ITA’s are issued on a semester basis.

F.13. Specify if the Local Area plans to offer incentives for youth. If yes, attach the Youth Incentive Policy to include: a) criteria to be used to award incentives; b) type(s) of incentive awards to be made available; c) whether WIOA funds will be used and d) the Local Area has internal controls to safeguard cash/gift cards. Name document: Local Area Name Youth Incentive Policy.

Incentives are allowed for youth with WIOA funds.

[See High Country Youth Incentive Policy](#)



## **PY 2015 Local Area Plan Instructions Attachment Checklist**

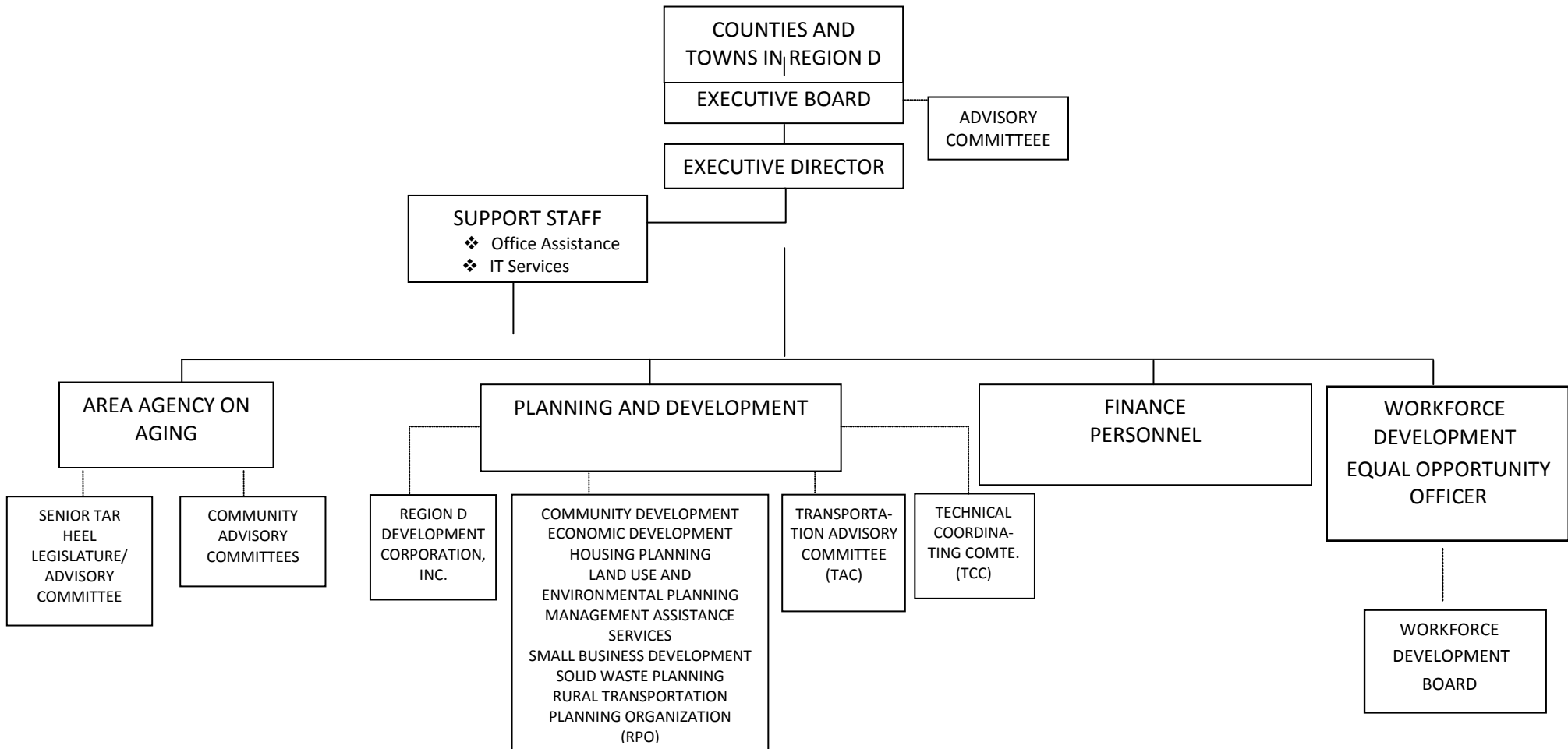
- Consortium Agreement\*
- Administrative Entity Organizational Chart
- Workforce Development Board List (*provided*)
- Workforce Development Board By-laws
- Local Area Organizational Chart
- Local Area Certification Regarding Debarment \* (*provided*)
- Local Area Signatory Form\* (*provided*)
- Local Area Oversight Monitoring Policies and Tools
- Local Area Equal Opportunity Procedures
- One-Stop Memorandum of Understanding
- Local Area NCWorks Career Center System (*provided*)
- Local Area Services Flow Chart
- Local Area Adult and Dislocated Worker Services Providers (*provided*)
- Local Area Youth Program Elements (*provided*)
- Local Area Youth Services Providers (*provided*)
- Local Area Supportive Services Policies
- Local Area Needs-Related Policies
- Local Area Incumbent Worker Training Policy
- Local Area Transitional Jobs Policy
- Local Area On-the-Job Training Policy
- Local Area Individualized Training Account Policy
- Local Area Youth Incentive Policy

\*Mail signed and unfolded originals to assigned Division Planner at N.C. Division of Workforce Solutions, 4316 Mail Services Center, Raleigh, N.C. 27699-4316.

# HIGH COUNTRY COUNCIL OF GOVERNMENTS

FY 2014-2015

Revised 5.12.15



## High Country WIOA Board List

(Effective July 1, 2015)

Category	Name and Business Title	Business Name and Address <sup>5</sup>	Phone Number	Email Address	Term
Business, Chair	Rhonda Herman, Executive Vice President	McFarland & Company, Inc. PO Box 733 Jefferson, NC 28640	336-246-4460 x.101	rherman@mcfarlandpub.com	6/30/2016
Business, Vice Chair	Dwight Simmons, President	Mountain Lumber Company PO Box 1813 Boone, NC 28607	828-963-9804	dwight@mountainlumbercompany.com	6/30/2016
Business	Vacancy (Alleghany County)				
Business	Trasa Jones, Human Resources Director	Pioneer Eclipse 1 Eclipse Road PO Box 909 Sparta, NC 28675	336-372-3748	trasajones@pioneer-eclipse.com	6/30/2015
Business	Kory Wilcox, HR Manager	GE Aviation 400 The Professional Dr. West Jefferson, NC 28694	336-246-1725	kory.wilcox@ge.com	6/30/2015
Business	Justin Ray, President	Shady Lawn Lodge &	828-733-9006	jray34@gmail.com	6/30/2016

**Notes:**

+ Identify category represented: Labor, Apprenticeship, or Community Based or Youth Organization.

\*If Local Workforce Development Board Area has more than 19 total members, please change chart accordingly.

## High Country WIOA Board List

(Effective July 1, 2015)

		Restaurant 330 Cranberry St., Newland, NC 28657			
Business	Vacancy (Watauga County)				
Business	Bob Hege, President	Meadows Mills, Inc. PO Box 1288 N. Wilkesboro, NC 28659	336-838- 2282	bobh@meadowsmills.com	6/30/2016
Business	Jason Carlton, Owner	GoWilkes.com PO Box 143 N. Wilkesboro, NC 28659	336-902- 8163	jcarlton@gowilkes.com	6/30/2015
Business	Bryan Peterson, Human Resources Manager	Altec Industries PO Box 130 Burnsville, NC 28714	828-678- 5502	bryan.peterson@altec.com	6/30/2016
Business	Mitzi Layell, HR, Safety & Training Manager	Glen Raven Technical Fabrics, LLC 73 East US Hwy 19E, Burnsville, NC 28714	828-678- 3101	mlayell@glenraven.com	6/30/2015
Community Based Organization	Daniel Barron, Director	Avery- Mitchell- Yancey Regional Library PO Box 543 Bakersville,	828-682- 4476	drdanbarron@gmail.com	6/30/2015

**Notes:**

+ Identify category represented: Labor, Apprenticeship, or Community Based or Youth Organization.

\*If Local Workforce Development Board Area has more than 19 total members, please change chart accordingly.

## High Country WIOA Board List

(Effective July 1, 2015)

		NC 28705			
CBO	Vacancy				
CBO	Vacancy				
Wagner-Peyser	Vacancy				
<b>Adult Education and Literacy</b>					
Higher Education	Nancy Reeves, Educational Consultant	Ashe County Chamber of Commerce 7 West 6 <sup>th</sup> Street West Jefferson, NC 28694	336-846- 5072	reevesnancyr@gmail.com	6/30/2015
Vocational Rehabilitation Agency	Mike Birkmire, Manager	Vocational Rehabilitation Services 245 Winklers Creek Road, Suite A, Boone, NC 28607	828-265- 5396	michael.birkmire@dhhs.nc.gov	6/30/2015
Economic Development	Dan Little, Director	Wilkes EDC 213 Ninth Street N. Wilkesboro, NC 28659	336-838- 1501	dlittle@wilkesedc.com	6/30/2015
Labor	Stacy Sears, SEANC Member/ Interim Director for Athletes	Appalachian State University PO Box 1163 Boone, NC	828-262- 6889	searssr@appstate.edu	6/30/2015

**Notes:**

+ Identify category represented: Labor, Apprenticeship, or Community Based or Youth Organization.

\*If Local Workforce Development Board Area has more than 19 total members, please change chart accordingly.

## High Country WIOA Board List

(Effective July 1, 2015)

		28607			
Social Services	Tom Hughes, Director	Watauga County Department of Social Services	828-265- 8100	tom.hughes@watgov.org	6/30/2015

**Notes:**

+ Identify category represented: Labor, Apprenticeship, or Community Based or Youth Organization.

\*If Local Workforce Development Board Area has more than 19 total members, please change chart accordingly.

# High Country Workforce Development Board By-Laws

## ARTICLE I — The Board

**Section 1 - Name:** The name of this organization shall be the High Country Workforce Development Board (WDB).

**Section 2 - Service Area:** The area to be served by the WDB shall be Alleghany, Ashe, Avery, Mitchell, Watauga, Wilkes and Yancey Counties.

**Section 3 - Purpose:** It is the purpose of the Board to act as a governance board for career centers in the Service Area and to provide policy guidance for and exercise oversight with respect to activities under the Local Plan for the Service Area in partnership with the High Country Workforce Development Consortium (Consortium).

a. **Duties and Responsibilities:** Duties and responsibilities of the Workforce Development Board are as follows:

i. To develop policy and act as the governing body for local

workforce development;

ii. To provide planning, oversight, and evaluation of local workforce development programs, including the local delivery system;

iii. To provide advice regarding workforce policy and programs to local elected officials, employers, education and employment training agencies, and citizens;

iv. To jointly develop a Local Plan with the Consortium in coordination with the appropriate community partners to address the workforce development needs of the Service Area;

v. To develop linkages with economic development efforts and activities in the Service Area and promote cooperation and coordination among public organizations, education agencies, and private businesses;

vi. To review local agency plans and grant applications for workforce development programs for coordination and



achievement of local goals and needs;

vii. To serve as the Workforce Development Board for the Service Area for the purpose of the federal Workforce Innovation and Opportunity Act (WIOA), Public Law 113-128 as enacted July 22, 2014.

viii. To oversee career centers, monitor activities, and evaluate the performance of each career center's programs and services.

ix. To ensure that the Local Fiscal Area Agent contracts for an outside audit of its own financial procedures annually. The WDB has audit review rights.

b. The Workforce Development Board shall not operate or manage career centers but shall serve in the role of governance providing planning, monitoring, evaluation, and oversight.

**Section 4** - The Board shall act as local partners with the Consortium in the implementation of the WIOA, and provide guidance to staff in the development of the Local Plan. The Board will review the Local Plan for approval by the Consortium prior to submission to the North Carolina Governor.

## ARTICLE II — Membership

**Section 1** - The voting members of the Workforce Development Board shall be appointed by the County Commission Chairs or designated "chief elected official for WIOA purposes of each county (Alleghany, Ashe, Avery, Mitchell, Watauga, Wilkes, and Yancey) in a manner consistent with federal and state laws and regulations governing the Board.

**Section 2** - The High Country Workforce Development Board shall consist of a minimum of twenty-three voting members The Board shall have 14 private sector members who are appointed by Consortium representatives (2 appointments per County Consortium Representative) in accordance with the Act. The Consortium shall

appoint 9 public sector members of the WDB by a vote of a majority of the total number of members of the Consortium.

### **Section 3 - Board Membership Composition**

Private Sector/Business Member Seats:

- No less than 51% of total board composition
- 2 seats from each county with one seat expiring in an odd-numbered year and the other in an even-numbered year (14 total) beginning July 1
- Shall be appointed from key industry sectors or key local businesses aligned with local or regional economic development strategies
- Should have optimum decision-making authority within their organizations. Owners, managers, or HR managers are appropriate. They may represent small or large businesses or organizations representing businesses as described in the WIOA
- Nominations shall be provided by local business groups such as

Chambers of Commerce, Economic Development Commissions  
and business trade associations

**Public Sector Seats (At-Large Floating seats):**

Whereas private sector/business members are representing their organizations, sector's, and county's workforce needs, public sector members are representing their organization with a regional perspective. These board members shall be regional representatives and shall be appointed through a majority vote of the Consortium. All public sector members shall be in accordance with WIOA Section 107 (b) (2).

- No less than 20% of total board composition shall be representatives of the workforce within the local area and include:
- Labor: shall be a representative from a labor organization, who have been nominated by a labor federation, or other

representatives of employees.

- Apprenticeship: shall be a representative from the NC Apprenticeship Program or similar organization focusing on apprenticeship activities.
- Community-Based Organizations (CBOs): Organizations with demonstrated experience in addressing the employment needs of individuals with barriers to employment including veterans organizations and youth organizations.
- Adult Education and Literacy: The regional Adult Education and Literacy Program Directors shall nominate a representative to serve in this role.
- Post-Secondary Education: The regional Post-Secondary Educational Institutions shall nominate a representative to serve in this role. To include community, state, and private colleges in the Service Area.
- State Employment Service: The Department of Commerce will nominate a regional representative to serve in this role.

- Economic Development: The local economic development commissions will nominate a representative in this role.
- Vocational Rehabilitation Agency: The NC Division of Vocational Rehabilitation shall nominate a regional representative to serve in this role.

### **Ex-Officio Members**

The Consortium may appoint other members of the community in an ex-officio role that may be helpful in an advisory role to further advance the mission statements and goals. The WDB may add non-voting members at its discretion, to include elected officials or their representatives.

**Section 5** - All appointments and reappointments will be for a two-year period, with alternating terms. Vacancies shall be filled by the procedures prescribed for all other appointments and shall be for the remainder of the term.

## **ARTICLE III — Officers**

**Section 1 - Chair:** Voting members of the Workforce Development Board shall elect the Chair from the Private Sector Representatives who are eligible to serve pursuant to the requirements of state and federal law. The chair shall call and preside at meetings, appoint committees, and through the Board's support staff, perform such other duties as directed by the Board.

**Section 2 - Vice-Chair:** The eligibility requirements shall be the same as for the Chair. The duties of the Vice-Chair shall be to conduct the business of the Board in the absence of the Chair and such other duties as may be assigned by the Chair.

**Section 3 - Term of Office:** The term of office shall be for a period of one (1) year. Officers may succeed themselves. Elections shall be held at the last regularly scheduled meeting of each Program Year. The terms of office shall begin on July 1 of each year.

## **ARTICLE IV — Conflict of Interest and Code of Conduct**

In an effort to maintain the high standard of conduct expected in the

management of its affairs, the High Country Workforce Development Board adopts the following Code of Conduct applicable to all members:

No Board member shall:

1. Use the name, endorsement, or services of the Service Area for the benefit of any person, or authorize such use, except in conformance with WDB policy
2. Accept or seek for oneself, or any other person, any financial advantage or gain other than nominal value offered as a result of Board affiliation
3. Disclose any confidential Workforce Development Board information to any person not authorized to receive such information or use such information to the disadvantage of the Service Area;
4. Take part in any religion, anti-religious, or partisan political activities in the discharge of Board duties;
5. Take any action which results in a conflict of interest, or the



appearance of a conflict of interest, in accordance with Federal Uniform Administrative Requirements;

a. Conflict of Interest arises when any of the following may be positively or negatively affected by an action under consideration by the WDB:

i. the business in which a member, or one of the immediate family of a member, has a financial interest

ii. the public or non-profit agency which employs a member, or one of the immediate family of a member;

iii. the public or non-profit agency on whose Board a member, or one of the immediate family of a member sits.

**Immediate Family** shall be defined as a member's spouse, parents, children, and siblings.

b. Members must declare any potential conflict of interest on the WDB Information Sheet completed upon joining the Board and

thereafter at the first meeting of each Program Year. When a potential conflict of interest arises during the year, the member will immediately notify the WDB Chair and the Workforce Development Director in writing.

c. The Conflict of Interest provision applies equally to Board meetings, or personal contact with members outside of meetings, for the purpose of influencing or affecting the member's thinking or decision-making.

d. WDB members must make a conflict declaration upon the introduction of any agenda item that raises a real or apparent conflict of interest and must abstain from discussion and voting after declaring the conflict. Meeting minutes must show all conflict declarations and abstentions.

e. Where there is a real or apparent conflict of interest, WDB members must refrain from participating in all stages of the procurement process, including:

- i. participating in the planning process to the extent of advocating that a certain type of service be included or excluded;
  - ii. participating in the development, review, or approval of the procurement method and instrument which a member, one of the immediate family of a member, or the entity a member represents intends to respond to by submitting a proposal;
  - iii. participating in the provider selection process including discussing or voting on one's own or a rival proposal (one which competes for funding from the same source);
  - iv. attempting to influence a planning or funding decision by lobbying or advocating for or against a plan for proposal.
- f. No member who has a conflict of interest may serve as a WDB officer or committee chair.

It is the responsibility of each member and alternate of the Workforce Development Board to govern the actions of all Board members in compliance with the Code of Conduct. If a member thinks there is a

possibility of a conflict of interest, real or apparent, on the part of another member, it is his or her affirmative responsibility to immediately bring the matter to the attention of the Board or Executive Committee.

Upon the assertion of a possible violation of this policy, the Chair or Vice-Chair will appoint an ad hoc committee to review the circumstances, report their findings to the Board for discussion and vote, and recommend a course of action in the event a member is found to be in violation. Action may include, but is not limited to, a declaration that the member's seat is vacant and a request to the appropriate Consortium representative or Consortium Board to make a new appointment. In addition, civil penalties may be sought in the event the WDB incurs disallowed cost or damages due to violation of this Code of Conduct.

This Code of Conduct conforms to the Federal Uniform Administrative Requirements (Common Rule).

## ARTICLE V — Staff

**Section 1 - WDB Support:** The WDB shall be supported in the performance of its duties by the Workforce Development Director and/or staff provided by the Local Area Fiscal Agent. This staff shall be responsive to the needs of the WDB and shall support the WDB in its mandated functions

## ARTICLE VI — Board Meetings

**Section 1 - Regular Meetings:** The Board shall meet on a quarterly basis or as otherwise designated by the chairperson.

**Section 2 - Special or Called Meetings:** The Chair, and the Workforce Development Director, may call special meetings of the Board as required or with a majority decision of Board members.

**Section 3 - Quorum:** For any regularly, or otherwise properly, called meeting, the voting members present shall constitute a quorum.

**Section 4 - Voting:** All actions of the Board shall be determined by a

majority of the quorum. The adoption and amendments of the by-laws shall be by a two-thirds vote of the members present. Each member of the board shall have one vote and no proxy votes shall be allowed.

**Section 5 - Order of Business:** The Chair shall be responsible for orderly business of the Board and for calling items on the agenda. During the course of considering items on the agenda, only members of the Board shall participate in the discussion except 1) by prior arrangement with the Chair upon request of a member of the Board or 2) during the public participation period.

**Section 6 - Agenda:** The agenda for Board meetings shall be developed by the Board staff and by the Chair.

**Section 7 -** The rules set forth in the current edition of Robert's Rules of Order, Newly Revised, shall govern the procedures of the Board, unless otherwise agreed upon by the members.

**Section 8 - Public Notice:** Meetings of the Workforce Development Board shall be open, and it shall be a stated policy that interested

citizens or groups will be heard on workforce development matters in accordance with Article V, Section 5. Workforce Development Board Meetings should be publicized and operated in accordance with the North Carolina Open Meetings Law.

**Section 9 - Reimbursement:** Workforce Development Board members who do not have compensation available from their employing agencies shall be reimbursed for travel and meals. Funds for such reimbursement will be provided by the Local Area Fiscal Agent. The Local Area Fiscal Agent will be responsible for maintaining records of reimbursements.

**Section 10 - Conflict of Interest:** No member of the Workforce Development Board shall involve her or himself in any matter which has direct bearing on services to be provided by that member, his or her family member, or any organization with which that member is associated. All members shall abide by the High Country Workforce Development Board Code of Conduct which becomes part of the by-laws by reference.

**Section 11 - Minutes:** The Local Area staff shall keep minutes and provide copies to all WDB members.

**Section 12 - Attendance:** Positions of WDB members, or their designated alternate representatives, who miss three consecutive regular meetings shall be declared vacant. The Consortium representative responsible for the vacant seat's appointment will be notified by the WDB Staff to appoint a representative to fill the vacancy.

**Section 13 - Alternates:** Each WDB member may request that an alternate be appointed by the appropriate Consortium Representative to attend in the WDB member's absence. The WDB member will be responsible for keeping his/her alternate informed of the meetings and information pertaining to the meeting(s) the alternate will attend for the WDB member. The alternate will vote as a WDB member in the absence of the member. Alternates must be from the same category of representatives (i.e. business/industry, agency) as the WDB member for whom the alternate is appointed.



## ARTICLE VII — Committees

**Section 1 - Committee Structure:** The WDB shall, as necessary, be organized into standing or ad hoc committees to carry out its functions and responsibilities as assigned. The Chair and committee members shall be designated by the WDB Chairperson.

**Section 2 - Executive Committee:** The Chairperson, Vice-Chairperson, , past Chair, and other members appointed by the Chair shall compose the Executive Committee. **Section 3 - Committee Authority:** The High Country Workforce Development Board recognizes that each committee serves as policy maker and systems builder for its specific area and delegates to its committees authority and flexibility to accomplish the goals and assignments for the tasks under their authority so long as the committees are functioning within the framework of the Board's underlying philosophy.

**Section 4 - Quorum:** Committees have the same quorum requirements as outlined in Article V, Section 3.

## ARTICLE VIII — By-Laws Amendment Procedure

These by-laws may be amended at any regular meeting of the Board by a two-thirds vote of the quorum present, provided that the proposed amendment has been submitted in writing at the previous regular meeting. Amendments will not take effect until approved by a majority of the Consortium Board.

Adopted this the \_\_\_\_ day of \_\_\_\_\_, 2015 by a majority vote of the Consortium Board.

---

*Consortium Chief Elected Official Date*

I hereby certify that during the regular organizational meeting of the High Country Consortium on \_\_\_\_\_, 2015, these By-Laws were adopted.

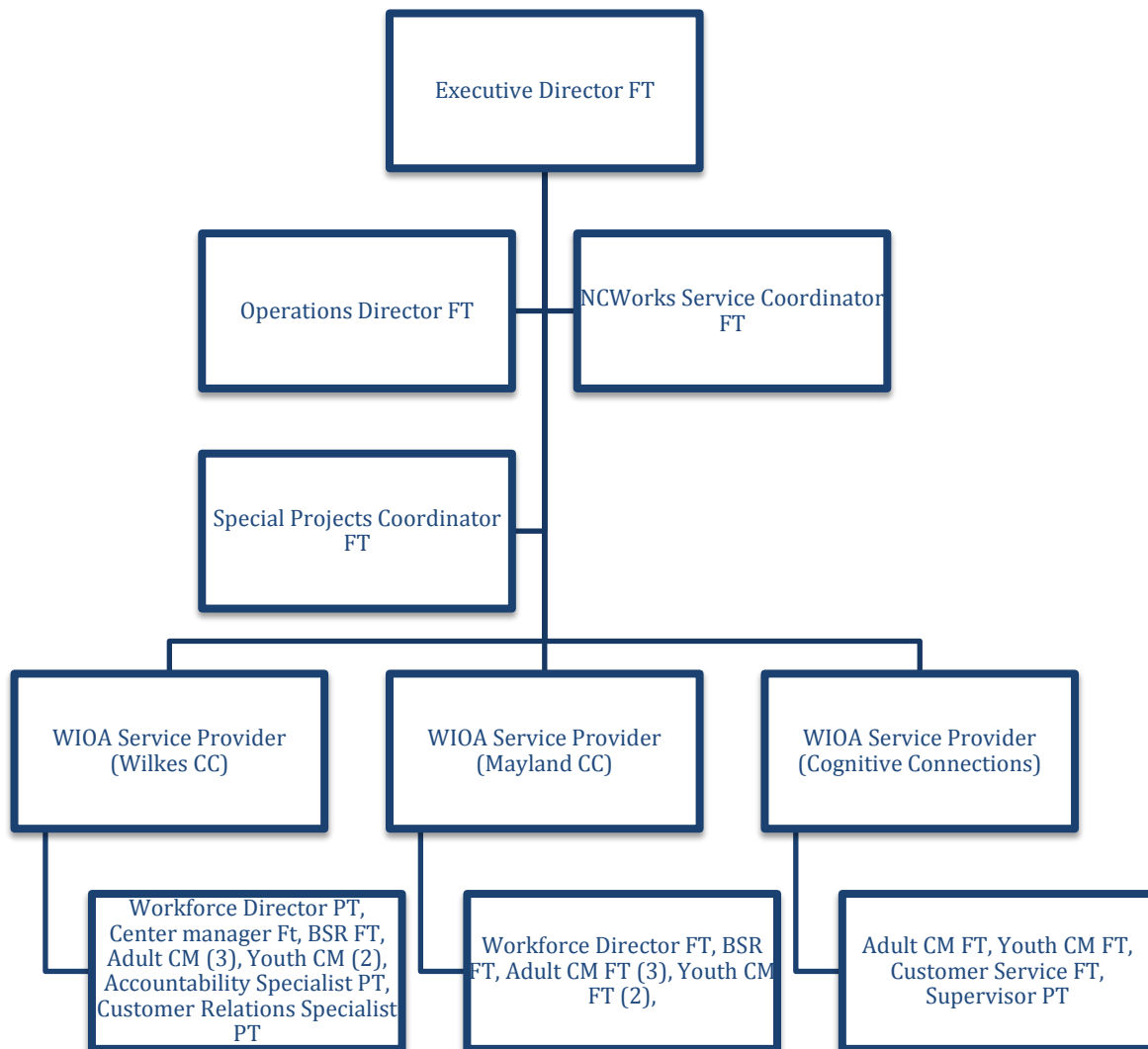
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*(attest)*

*Date*



## 2015 Organizational Chart



## **Certification Regarding Debarment, Suspension, and Other Responsibility Matters Primary Covered Transactions**

(1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;

(b) Have not within a three-year period preceding this proposal 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;

(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and

(d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.

(2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

## **Certification Regarding Debarment, Suspension, and Other Responsibility Matters Instructions for Certification – Primary Covered Transactions**

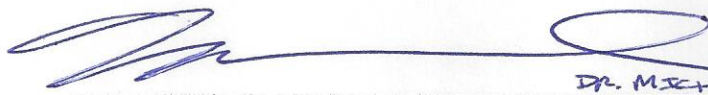
1. By signing and submitting the certification signature page with this proposal, the prospective primary participant is providing the certification set out below.
2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.
3. The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.
4. The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
5. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participants, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.
6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR Part 9, Subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction.



7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "A Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not proposed for debarment under 48 CFR Part 9, Subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Non-Procurement programs.
9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR Part 9, Subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

DR. MICHAEL N. DUVALI - HCCOG EXECUTIVE DIRECTOR

Printed Name and Title of Authorized Administrative Entity Signatory Official

  
DR. MICHAEL N. DUVALI

Signature

05-27-2015

Date

# Workforce Innovation and Opportunity Act of 2014

Local Area Plan Program Year 2015

for

High Country Workforce Development Board  
Local Workforce Development Area Name

We affirm that the Local Area Workforce Development Board (WDB) and the Chief Elected Official(s) of the Local Area, in partnership, have developed and now submit this comprehensive, strategic Local Area Plan in compliance with the provisions of the Workforce Innovation and Opportunity Act of 2014 and instructions issued by the Governor under authority of the Act.

May 29, 2015

Submission Date

Workforce Development Board  
Chair

Chief Elected Official

Rhonda Herman

Typed or Printed Name

President, McFarland  
Chair, HCWFDB

Typed or Printed Title

Rhonda Herman

Signature

5/28/15  
Date

(G. Keith Elmore)

Typed or Printed Name

G. Keith Elmore

Typed or Printed Title

County Commissioner

Signature

5/26/15  
Date

*Workforce Innovation and  
Opportunity Act  
Adult/Dislocated Worker/Business Services/Youth*

*ADMINISTRATIVE/PROGRAMMATIC/FISCAL  
MONITORING GUIDE*

*HIGH COUNTRY LOCAL AREA  
(REGION D)*

High Country Council of Governments  
High Country (Region D) Local Area  
468 New Market Blvd.  
Boone, North Carolina 28607

Revised  
May 2015

## Monitoring Guide Instructions

- ❖ **Workforce Investment Act Providers** need to **be prepared to answer** the administrative and program sections of the Monitoring Guide during the on-site visit by Local Area Staff. These sections have changed very little from last year.
- ❖ The administrative section is intended to cover the personnel and equal opportunity responsibilities associated with the Title I Workforce Investment Act services that your agency provides.
- ❖ The program document includes three sections: Adult and Dislocated Worker Services and Youth Services. Please review the section(s) that are applicable to the program(s) that the High Country Local Area contracts with your agency to provide. The information contained in the programmatic sections will address information and processes related to program service delivery. Our goal is to monitor your agency's systems in providing the best possible program services and to insure that the program(s) you provide are in compliance with state, local, and federal legislation, regulations and policies.
- ❖ Customer file monitoring checklists are being provided for the WIOA program services that your agency provides. Local Area staff will review a predetermined sample of cases using the file checklists. The review will focus on eligibility documentation, data validation, the individual employment plan and documentation of the case in the case and/or activity notes recorded in NCWORKS, the state's WIOA customer management system. You may use the document(s) for internal monitoring of customer files or you may use the guide(s) as reference(s) in developing your own document(s). Prior to and during the on-site review, local area staff will look at your internal monitoring reviews, the findings, any corrective action needed, and the completion of corrective action. Staff will pick a sample of files to review and compare to your internal monitoring results.
- ❖ The Financial Monitoring will be scheduled with your organization's finance staff responsible for reporting expenses to the Local Area. A copy of the financial monitoring document is being provided for your information prior to our visit. LA staff will review overall financial systems. During that review staff will perform an in-depth review of expenses and backup documentation for a predetermined month during the current program year. The month to be reviewed will be communicated to the appropriate finance staff prior to the financial monitoring visit. A copy of the invoice(s), printouts from your organization's accounting system will need to include a copy of the chart of accounts, appropriate and relevant reports from the General Ledger, timesheets and time effort forms for all WIOA funded positions, cost allocation plans for the month being reviewed, and backup documentation supporting the reported monthly expenses will need to be available during the onsite review. Any additional documents will be requested prior to or during the on- site review.



- ❖ Monitoring activities may also include work site visits, class site visits, and customer interviews.
- ❖ Following the review, the LA staff will review any findings that have been noted, review additional documents if necessary, and resolve as many issues as possible. **If appropriate, operators are expected to respond to any issues in dispute at this time.** A summary of this meeting will be recorded and maintained at the LA office.
- ❖ A desk review will be conducted at the LA office prior to and/or following the on-site review. A written summary of both the on-site and desk review, with any required corrective action, will be mailed to the operator following the review. The summary will include deadlines for corrective action and responses. Failure to comply with corrective action requirements in a timely manner may be referred to the High Country Workforce Development Board for further action.
- ❖ The LA Monitor(s) will maintain complete monitoring records and will be responsible for tracking corrective action responses and any additional needed correspondence. Operators should contact the LA Monitor(s) directly with questions or comments. If necessary, Monitor(s) will direct inquiries to other appropriate staff.

**HIGH COUNTRY (REGION D) LOCAL AREA**  
**Workforce Development**  
**CONTRACTOR MONITORING GUIDE**

Contractor: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

Contact Person(s)/Title(s): \_\_\_\_\_

\_\_\_\_\_

Telephone Number(s): \_\_\_\_\_

Date(s) Monitored: \_\_\_\_\_

Site(s) Monitored: \_\_\_\_\_

High Country staff conducting review: \_\_\_\_\_

\_\_\_\_\_

**Contracts**

**Contract Amounts**

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**CORRECTIVE ACTION REQUIRED AS A RESULT OF THIS REVIEW?    YES    NO**

**REGION D STAFF FOLLOW-UP REQUIRED? \_\_\_\_\_ YES \_\_\_\_\_ NO**

**Staff Signature(s):** \_\_\_\_\_



<b>Contracting</b>		<b>YES</b>	<b>NO</b>	<b>N/A</b>
1.	Does the Contractor have procedures to prevent the subcontracting of any or all interests, work, or services under the Contract without prior written approval of the LA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Does the Contractor acknowledge the LA or its assignee's rights to documents, materials, and data identified and produced under the Contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contracting Comments:				
<b>Worker's Compensation Policy or Medical Accident Insurance</b>		<b>YES</b>	<b>NO</b>	<b>N/A</b>
1.	Does the Contractor have clear documentation of Worker's Compensation or medical/accident/disease insurance policies covering all WIOA customers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Are customers provided with adequate on-site medical and accident insurance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Where customers are engaged in activities not covered under the Occupational Safety and Health Act of 1970, are there assurances that customers will not be exposed to training or working conditions which are unsanitary, hazardous, and/or dangerous to health and safety?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Worker's Compensation Policy/Medical Accident Insurance Policy Comments:				

<b>Equal Opportunity Compliance</b>				
<b>Equal Opportunity Officer (29 CFR 37.54 (d) (1) (ii))</b>				
Please name your agency's Equal Opportunity Officer and give their non EO Position Title:				
By what means has your agency made public the name, position title and telephone number (including free Relay Number 711 in NC) of the EO Officer:				
		<b>YES</b>	<b>NO</b>	<b>N/A</b>
1.	Does your organization chart show the EO Officer's position in the organization?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Does your organization have a documented position description for the Equal Opportunity Officer that includes all EO related responsibilities? If so, please have available.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Has the Equal Opportunity Officer had training to ensure competency in the area of Equal Opportunity responsibilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If yes, please provide a list of EO training sessions and dates attended by the EO Officer and list any future training sessions scheduled with dates.				

Equal Opportunity Officer Comments:			
<b>Notice and Communication</b>			
1. Are the Office of Civil Rights and Equal Opportunity notices displayed in areas accessible to staff, applicants, and customers?	YES <input type="checkbox"/>	NO <input type="checkbox"/>	N/A <input type="checkbox"/>
2. Is a signed copy of the EO Notice placed in each customer's file?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please identify locations where the notices are available:			
Identify and provide documentation to substantiate the methods and frequency of dissemination of the Equal Opportunity Notice:			
Describe how the EO Notice is made available to individuals with disabilities:			
Notice and Communication Comments:			
<b>Assurances</b>			
1. Does the organization have written Equal Opportunity policies? If yes,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Do they cover staff and customers funded by WIOA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Do the EO policies provide adequate systems to guarantee equal opportunity and nondiscrimination in programs funded under WIOA including:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- The designation of an EO Officer and the public notification of this designation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Contract development that includes equal opportunity and nondiscrimination assurances and grievance procedures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are there procedures to ensure that all contractor staff are knowledgeable about Equal Opportunity rules and regulations and your EOPolicies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Do all WIOA funded staff have in their possession a copy of the organization's Equal Opportunity Policy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Are policy issuances developed in manner that promotes non-discrimination?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe how your organization ensures that all staff are adequately trained regarding non-discrimination and equal opportunity responsibilities:			
Assurances Comments:			
<b>Universal Access</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
1. Has the contractor made efforts (including outreach) to broaden the composition of the pool of those considered for participation and employment in their programs and activities in an effort to include members of both sexes, of the various racial and ethnic groups and of various age groups, as well as individuals with disabilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If so, please include a summary of those efforts and/or copies of the following: targeting, outreach and recruitment plans, criteria for determining priority of service, plans for the JobLinks to expand the pool of those considered for participation or employment in their programs by race/ethnicity, sex, disability status, and age.			
	<b>YES</b>	<b>NO</b>	<b>N/A</b>
2. Are samples of brochures, posters, public service announcements, computer screens displaying related information and other publicity materials available for review? If so, please include copies:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Does your organization provide persons with limited English speaking abilities equal opportunities to participate in programs and activities as those who are proficient in English?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Do you provide customer information to persons with limited English speaking abilities in languages other than English? If yes, please provide a sample of those documents.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Universal Access Comments:			
<b>Accessibility (Section 504 of the Rehabilitation Act of 1973, as amended and 29 CFR 37.54 (d) (2) (v))</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
1. Has the agency completed an accessibility analysis with the assistance of persons with disabilities or other specially qualified individuals within the last year?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Is analysis available for review?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Have adequate steps been taken to address areas identified as problems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	YES	NO	N/A
3. Does the contractor assure that all areas of accessibility for persons with disabilities are within the guidelines of Section 504 of the Rehabilitation Act of 1974 and the Americans With Disabilities Act?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Have all problem areas been resolved? If no, please specify problems areas that continue to exist along with plans and timelines for resolution of the deficiencies:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Does agency have telecommunications devices for individuals with hearing impairments (TDDs) or equivalent as required by 29 CFR Part 34?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Is there evidence that there are equal opportunities for participation for persons with disabilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Has guidance been sought from Services for the Blind to determine if additional reasonable accommodations need to be made for current or potential customers with visual impairments? If yes, please include documentation of the guidance provided.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Does literature and broadcast materials made available to the public include the following: <ul style="list-style-type: none"> <li>- "Equal Opportunity Employer/Program(s)"?</li> <li>- "Auxiliary aids and services are available upon request to individuals with disabilities"?</li> <li>- Indication of free relay number in North Carolina 711 or provision for equally effective means of communication with individuals with hearing impairments?</li> </ul> Please have copies of these materials available.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments on Accessibility:			
<b>Data Collection and Analysis (29 CFR 37.54(d) (1) (iv) and (vi))</b>			
1. Does the Title I WIOA Service Provider collect the following demographic information for each registrant, applicant, eligible applicant, customer, employee and applicant for employment: <ul style="list-style-type: none"> <li>- Race/ethnicity?</li> <li>- Sex?</li> <li>- Age?</li> <li>- Disability status?</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is there evidence that programs contribute to the elimination of sex stereotyping?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Has the Title I WIOA service provider established a data collection and maintenance system for its Title I financially assisted programs to demonstrate equal opportunity performance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If yes, please provide a copy of the data collected:			
If no, please provide a plan with timelines to have the data collection and maintenance system in place regarding equal opportunity performance:			

Please provide an analysis of data collected by race/ethnicity and sex, of program and employment activity, including but not limited to rates of application, registration into WIOA funded programs, job placement and outcomes:

Data Collection and Analysis Comments:

<b>Monitoring</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
1. Does your agency have documented, policies and procedures for monitoring subcontractors (such as OJT) to insure Equal Opportunity compliance with those subcontracts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Are there policies that address the handling of problems/issues that result from monitoring EO compliance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Have any EO violations been identified with any subcontractors during the current program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Have those problems been resolved? If no, please comment:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Are WIOA Service providers aware of the Local Area's responsibility to monitor each service provider for Equal Opportunity Compliance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments on Monitoring:

<b>Discrimination Complaint Processing Procedures</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
1. Are there written procedures for addressing complaints of non-criminal and program discriminations, including discrimination on the basis of handicap/disability?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Are procedures for grievances and complaints shared with staff and customers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Do the written procedures contain provisions for the following:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Initial, written notice to the complainant that contains an acknowledgement that the contractor has received the complaint, and a notice that the complainant has a right to be represented in the complaint process?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- A written statement, provided to the complainant, that contains a list of the issues raised in the complaint and for each issue, a statement whether the contractor will accept the issue for investigation or reject the issue, and the reasons for the rejection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- A period for fact-finding or investigation of the circumstances underlying the complaint?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- A period during which the contractor attempts to resolve the complaint which includes alternative dispute resolution?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Description of procedures to be followed if the complaint is filed more than 180 days after the date of the alleged violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>





SECTION II Program Systems – Adult and Dislocated Worker Services				
Internal Monitoring		YES	NO	N/A
1.	Has the Contractor established a procedure to monitor the WIOA program files, progress, and performance on a continuous basis?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Have these procedures been documented and are they available for review? (Please have available)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Has the Contractor designated a staff person to be responsible for program monitoring? staff name	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	Are Supervisors reviewing cases in NCWORKS? - Is there documentation to support such reviews? (Please have available)	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
5.	Are internal monitoring reviews being completed regularly? - Is there documentation to support such reviews? (Please have available)	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
6.	Is there a procedure established to resolve any problem areas discovered during any of these internal monitoring reviews?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	Does documentation exist to support that corrective action has been taken when appropriate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Internal Monitoring Comments:				
Program Management		YES	NO	N/A
1.	Does the WIOA Contractor and the NCWorks Centers currently provide all the activities/services outlined in the Proposal including: (Check the activities/services the Contractor is providing for WIOA customers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Case Management Services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Full range of career services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Supportive Services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Employment Services (Work Experience, On-the-Job Training (OJT), Customized training?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Training Services through Individual Training Accounts and On-the Job Training?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Post-Employment/Follow-up Services, as appropriate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Is the WIOA Service Provider currently providing all career services including:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Eligibility Determination for WIOA services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Comprehensive and specialized assessments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Development of an individual employment plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Individual and Group counseling?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Career planning?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Case management?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Short-term prevocational services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Referrals to community and one stop partner services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Financial literacy services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Work experiences and internships linked to careers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Workforce preparation activities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Supportive services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Out of area job search assistance and relocation assistance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Does each WIOA case manager exhaust other available supportive service resources prior to committing WIOA funds for those purposes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Program Management Comments:				
<b>WIOA Recruitment/Referral</b>		<b>YES</b>	<b>NO</b>	<b>N/A</b>
1.	Has the Contractor established procedures in conjunction with NCWorks Partners to ensure appropriate and efficient referral of customers to intensive services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Are the NCWorks partners making referrals to the WIOA Case Managers when appropriate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Describe the WIOA customer outreach services:				
What other type of recruitment is being performed?				
Recruitment and Referral Comments:				
<b>WIOA Intake/Eligibility Determination</b> (Review a sample of the Contractor's customer records to verify eligibility determination and verification documentation.)		<b>YES</b>	<b>NO</b>	<b>N/A</b>
1.	Based on a sample file review, has the Contractor met the eligibility documentation requirements as specified in the WIOA legislation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Does the Contractor correctly verify and document those items of information pertinent to the determination of eligibility under the regulations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Is the appropriate supporting documentation for eligibility in the files?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	Has documentation of core services received been maintained on file for each customer?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	Does the WIOA Service Provider have a documented referral procedure for individuals who are not served by WIOA?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	Does the Contractor maintain individual files for eligible applicants or customers who choose not to participate in WIOA services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	Are files maintained on all ineligible referrals, which indicates the reason the individual was not eligible for WIOA services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Does the Contractor provide customer information on the full array of services available and the eligibility requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
What systems are in place for determining priority of services for veterans, low-income individuals and those receiving public assistance where funds are limited? (Please attach a copy of form, if applicable.)				
What procedures are in place for determining suitability?				

WIOA Intake/Eligibility Determination Comments:				
<b>Orientation</b>				
1.	Does the Contractor provide WIOA orientation to all customers prior to enrollment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Has the Orientation and Participant Rights form been completed with each customer, including the customer's signature and the date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Is the signed copy of the Orientation and Participant Rights form maintained in each customer's file/NCWorks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	Has the Consent for Release of Confidential Information been completed and a copy retained in the customer file?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Orientation Comments:				
<b>NC Works Transition</b>				
1.	Does the contractor have cases that have exited from NCWORKS since the system went live? - Does the contractor have a system in place to track "exits".	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Is the Contractor keying customer information within 10 working days from date of involvement including: - Appropriate Intake/Assessment Information? - Certification of eligibility? - Registration? - Service in existing and new activities? - Activity completion information? - Training/Support Services? - Enrollments/Outcomes? - Job Referral and Placement Information? - Employment Referrals and Outcomes Information? - Employment Follow-up Information, as appropriate? - Adult/DW/Youth Outcomes Information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Are individual case/meeting notes documented and maintained in the NCWORKS System?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reporting Requirements Comments:				
<b>WIOA Assessment</b>				
1.	Does the Contractor's assessment include an evaluation of the following: - Review of basic skills? - Review of educational attainment? - Review of occupational skills? - Prior work experience/work history? - Willingness to work? - Employability? - Interests and aptitudes? - Supportive services needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WIOA Assessment Comments:			
<b>Employability Plan</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
1. Has the Employability Plan been completed with a signature by each customer?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Does the Contractor incorporate all assessment information into the Employability Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Does the Contractor prepare a list of supportive services needs and incorporate those needs into the Employability Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Does the Employability Plan identify both long-term and current/short-term employment goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Does the Contractor list specific action steps, dates for achievement, the responsible party, and referral contacts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Are goals and objectives clearly stated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Are the Employability Plans individually tailored for each customer?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Is it evident the Contractor reviews and updates the Employability Plan as needs change?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Does the Contractor review and update the Employability Plan when a customer enters into or receives another service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Does the Contractor initial each update on the Employability Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Does the WIOA customer receive a copy of his/her Employability Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Is there evidence that the Employability Plan is developed in a timely manner based upon the needs, interests, and aptitudes of the customer?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Has the contractor begun using Employment Plans in NCWORKS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Employability Plan Comments:			
<b>Employment Counseling</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
1. Does the Contractor document all employment counseling, and customer contacts in NCWORKS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Does the employment counseling documentation contain enough information to, at a minimum give an objective picture of each customer's situation as it relates to employment, ?,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Is there evidence that the frequency and content of employment counseling is individualized to meet each customer's needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Counseling Comments:			
<b>Supportive Services</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
1. Does the contractor utilize supportive service funds?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is the need for payment supported by Employability Plan and the case notes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Is there a full accounting of: - the basis for the support payment? - the name, address, and phone number of the individual to whom the supportive services payment was made? - A receipt for the supportive services rendered or purchased?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are supportive services documented in the customer's Employability Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supportive Services Comments:			
<b>Individual Training Accounts</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
1. Are ITAs explained and offered to the WIOA customers who were unsuccessful under intensive services and are suitable for such services? - Is there a system for tracking ITAs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2.	Does the service provider use NCWORKS to assist the customer in selecting training programs approved by the WDB?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Are Pell Grants and other financial assistance utilized prior to use of WIOA funds for training services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	Is the training plan based on the individual's interests, aptitudes and abilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	Is the Contractor only providing ITAs for the occupations in demand identified by the Region D WDB?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	Describe the system for tracking ITAs			
7.	Does this tracking system ensure that the maximum annual/lifetime limits established by the WDB are not exceeded?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Individual Training Account Comments:				
<b>Work Experience</b>		<b>YES</b>	<b>NO</b>	<b>N/A</b>
1.	Is placement into a Work Experience consistent with the customer's Employability Plan or WIOA customer's prior performance in earlier activities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Is the Work Experience training length determination appropriately documented in the Employability Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Are Work Experience placements made based upon results of the assessments and the individual needs of the customers?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4.	Does the Contractor explain all the details of the contract including the necessity of work	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	Do Policies and Agreements address employer's responsibilities; service provider's responsibilities; and the participant's responsibilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	Do Work Experience Agreements comply with the WIOA Act/Regulations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	Are appropriate Work Experience contracts being developed consistently?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Does the Contractor monitor the employer to ensure that customers are receiving the training specified in the Employability Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.	Do the customer files contain work site evaluations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.	Does the customer's time and attendance correspond to Work Experience invoices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11.	Does the contracted wage rate correspond to actual wages paid?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12.	Are the following items maintained in the file:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Work Experience contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Customer performance evaluation report?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Invoices/time sheets?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Work Experience Comments				
<b>On-The-Job Training</b>		<b>YES</b>	<b>NO</b>	<b>N/A</b>
1.	Is placement into OJT activity consistent with Employability Plan or WIOA customer's prior performance in earlier activities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Are OJT placements appropriate and based on the results of the assessments and employment goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Is an OJT Pre-award checklist being used consistently and appropriately?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	Does the Contractor ensure that employers understand the intended outcome of the OJT activity (unsubsidized employment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	Is a detailed occupationally specific Job Training Plan developed for each customer?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	What assessments are being used to determine skill gaps for Training Plan?			
7.	Does the OJT customer's time and attendance correspond to OJT invoices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Are customers being compensated at the same rates as similarly situated employees or at a minimum wage?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.	Does the contracted wage rate correspond to actual wages paid?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

10.	Does the Contractor monitor the employer to ensure that customers are receiving the training specified in the OJT subcontract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11.	Is employment counseling being provided at the work site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12.	Are the following items maintained in the OJT files?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- OJT contract (including training plan and skills gap assessment)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Customer performance evaluation report	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Invoices/time sheets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
On-the-Job Training Comments:				
<b>Follow-up/Post-employment Services</b>		<b>YES</b>	<b>NO</b>	<b>N/A</b>
1.	Is the WIOA Contractor making follow-up services available, as appropriate, to WIOA customers after entry into employment? (Check the post-employment services the Contractor is providing for WIOA customers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- maintaining regular contact including scheduled visits or appointments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- providing employment counseling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- obtaining paycheck stubs in the 1 <sup>st</sup> and 3 <sup>rd</sup> quarters after exit (if not in UI wage system)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Follow-up/Post-employment Services Comments:				

SECTION III Program Systems – Youth Services				
<b>Internal Monitoring</b>		<b>YES</b>	<b>NO</b>	<b>N/A</b>
1.	Has the Contractor established a procedure to monitor the WIOA program files, progress, and performance on a continuous basis?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Have these procedures been documented and are they available for review? (Please have available)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Has the Contractor designated a staff person to be responsible for program monitoring? staff name	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	Are Supervisors reviewing youth files in NCWORKS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Is there documentation to support such reviews? (Please have available)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	Are formal monitoring reviews being completed regularly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- Is there documentation to support such reviews? (Please have available)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	Is there a procedure established to resolve any problem areas discovered during any of these internal monitoring reviews?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	Does documentation exist to support that corrective action has been taken when appropriate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Program Management</b>		<b>YES</b>	<b>NO</b>	<b>referral</b>
1.	Are each of the program elements available or are being provided by the WIOA service provider?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- tutoring, study skills training, and instruction leading to completion of secondary school, including drop-out prevention	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- alternative secondary school services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- activities that help youth prepare for and transition to postsecondary education and training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- paid or unpaid work experiences, including summer employment opportunities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- occupational skills training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- leadership development opportunities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- supportive services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- adult mentoring	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- comprehensive guidance and counseling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- follow-up services for not less than 12 months after participation ends	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	- services to provide labor market and employment info on in-demand industry sectors			
	- Internships and job shadowing			
	- on-the-job training opportunities			
	- education offered concurrently with workforce preparation activities			
	- financial literacy education			
	- entrepreneurial skills training			
2.	Does the WIOA service provider demonstrate that through the use of the ten program elements each youth customer is better prepared for employment or post-secondary education?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	For each youth enrolled in summer employment opportunities, was each youth enrolled and receiving services prior to participating in this component?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	Does the WIOA service provider operate a comprehensive, year-round youth services program?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	Has the WIOA service provider enrolled out-of-school youth?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	Has the WIOA service provider spent at least 75% of their funds on out-of-school youth?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	Does each WIOA case manager exhaust all other available resources prior to committing WIOA funds and services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Program Management Comments:				



<b>WIOA Recruitment/Referral</b>		<b>YES</b>	<b>NO</b>	<b>N/A</b>
1.	Please describe the customer outreach/marketing services that have been used for your youth program:			
2.	Is there a strong linkage with the school systems? If not, why?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	Has the youth case manager or supervisor provided information to teachers/administrators in written and printed materials (for example at staff meetings)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	What types of recruitment has been most successful and why?			
<b>WIOA Intake/Eligibility Determination</b> (Review a sample of the Contractor's customer records to verify eligibility determination and verification documentation.)				
		<b>YES</b>	<b>NO</b>	<b>N/A</b>
1.	Are all enrolled youth between 16 and 24?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	Are all enrolled youth income eligible?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	Are all enrolled youth within one or more of the following: - deficient in basic literacy skills; - school dropout; - homeless, runaway, or foster child; - pregnant or parenting; - offender; or - an individual who requires additional assistance.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	Did the Contractor correctly verify and document those items of information pertinent to the determination of eligibility under the regulations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	Is the appropriate support documentation for eligibility in the files?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6.	Does the WIOA Service Provider have a documented referral procedure for youth not served by WIOA? Please list agencies and programs to which your agency made direct referrals for youth customers not served. How is it documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7.	Does the Contractor maintain individual files for eligible applicants or customers who choose not to participate in WIOA services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Are files maintained on all ineligible referrals, which indicates the reason the individual was not eligible for WIOA services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

WIOA Intake/Eligibility Determination Comments:

<b>Orientation</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
1. Does the Contractor provide WIOA orientation to all customers prior to enrollment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Has the Orientation and Customer Rights form been completed with each customer, including the customer's signature and the date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Is the signed copy of the Orientation and Customer Rights form maintained in each customer's file?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Has the Consent for Release of Confidential Information been completed and a copy retained in the customer file?			—

Orientation Comments:

<b>NCWORKS Transition</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
1. Does the contractor have cases that have exited services in NCWORKS since the system went live?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Does the contractor have a system in place to track "exits".	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is the Contractor keying forms within 10 working days from date of involvement including:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Appropriate Intake/Assessment Information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Certification of eligibility	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Service in new activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Activity completion information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Skill Attainment Information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Job Referral and Placement Information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Employment Referrals and Outcomes Information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Employment Follow-up Information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are individual case/meeting notes documented and maintained in the NCWORKS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are the case notes up to date (within the last 10 working days?)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are the case notes meaningful, relevant to the individual's goals and needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Reporting Requirements Comments:

<b>Objective Assessment</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
1. Has an objective assessment been completed for each enrolled youth?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Does the Contractor's assessment include an evaluation of the following:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- a review of basic skills	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- a review of educational attainment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- a review of occupational skills	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- prior work experience/work history	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- willingness to work	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- employability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- interests and aptitudes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- supportive services needs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are basic skill goals being set for all in-school younger youth that test basic skills deficient?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are literacy/numeracy activities set and updated for those who test basic skills deficient?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Individual Service Strategy (ISS)/Service Plan</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
1. Has an ISS been completed and signed by each youth customer?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Does the Contractor incorporate all assessment information into the ISS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Does the Contractor prepare a list of supportive services needs and incorporate those needs into the ISS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Does the ISS identify both long-term and current/short-term employment goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Does the Contractor list specific actions steps, dates for achievement, the responsible party, and referral contacts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Are goals and objectives clearly stated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Is each ISS individually tailored?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Does the Contractor review and update the ISS with the youth customer at least quarterly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Does the Contractor review and update the ISS when the youth customer enters into or receives another service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Does the Contractor and youth customer initial each update on the ISS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Does the youth customer receive a copy of his/her ISS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Is there evidence that the ISS is begun prior to enrollment into activities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ISS Comments:			
<b>Employment Counseling</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
1. Does the Contractor document all customer contacts and individual meetings notes sessions in NCWORKS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Does the recorded documentation contain enough information to, at a minimum, paint a picture of the needs of each youth, services provided regularly scheduled contact with each youth, progress toward achieving individual skill goals and expected program outcomes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Does it appear that the frequency of case manager contact with customers is adequate to meet each customer's needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Counseling Comments:			
<b>Supportive Services</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
1. Does the contractor utilize supportive service funds?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is the need for payment supported in the ISS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Is there a full accounting of:			
- the basis for the support payment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- the name, address, and phone number of the individual to whom the supportive	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- A receipt for the supportive services rendered or purchased?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are all supportive services documented in NCWORKS?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supportive Services Comments:			



## WIOA FINANCIAL MANAGEMENT

Contractor: \_\_\_\_\_

Monitoring Date: \_\_\_\_\_ Monitor's Name: \_\_\_\_\_

Although the Local Area does not prescribe a uniform accounting system, each recipient of WIOA funds must comply with the terms of the contract or subcontract under which the WIOA funds are paid.

Each recipient shall establish and maintain a financial management system, which provides for adequate control of grant or agreement funds and other assets; ensures the accuracy of financial data; and provides for operational efficiency and for internal controls to avoid conflict-of-interest situations and to prevent irregular transactions or activities. The recipient shall ensure that its financial management system meets the following standards:

(a) Reporting. The recipient's reporting procedures shall provide accurate, current, and complete disclosure of the financial results of each grant or agreement. The recipient shall report on an accrual basis. A recipient whose records are not maintained on an accrual basis may develop accrual data for reports on the basis of an analysis of the documentation on hand. In such cases, the recipient's accounting process must provide sufficient information to compile data to satisfy the accrued expenditure reporting requirements and to demonstrate the link between the accrual data reports and the non-accrual fiscal accounts; and the recipient shall retain all such documentation for audit and monitoring purposes.

(b) Records. The recipient shall maintain records which identify adequately the source and application of funds for grant or agreement supported activities. The recipient shall ensure that the records systematically assemble information concerning federal awards and authorizations, obligations, unobligated balances, assets, liabilities, outlays, and income into balance sheet format for internal control purposes.

(c) Control of Assets. The recipient shall maintain effective control over and accountability for all project funds, property, and other assets. The recipient shall safeguard assets and shall assure that they are used solely for authorized purposes.

(d) Comparison of Outlays with Budget. The recipient shall compare outlays with budgeted amounts for each grant or agreement and, when required by performance reporting requirements of the grant or agreement, show the relation of financial information to performance data, including the production of unit cost data if appropriate.

Who is contractor's designated staff person responsible for fiscal duties, and is this the same person named in the contract application?

\_\_\_\_\_  Yes  No  N/A  
Name Title

**Verify that the contractor has a copy of the following:**

- 1) A copy of the Office of Management and Budget (OMB) circular appropriate to the organization.  
Check one of the following:
  - a. "Super Circular" - 2 CFR Part 200 (OMB A-87)

<i>CURRENT CONTRACT(S):</i>	<i>CONTRACT AMOUNT(S)</i>
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2) A copy of the Uniform Administrative Requirements (UAR) or "common rule" 29 CFR 97 adopted by DWS.

**Yes**     **No**     **N/A**

3) Provide a Brief Summary of the Internal Accounting and Administrative Controls from the most recent audit or audit history:

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Date the last Audit was completed: \_\_\_\_\_ Period Covered: \_\_\_\_\_

Date next audit is expected to be completed: \_\_\_\_\_

4) Does the contractor have any fiscal and/or fiscal related problems cited in the latest audit that continue to exist?

**Yes**     **No**     **N/A**

If yes, describe:

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5) Where are fiscal records kept?

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6) Is contractor in compliance with the requirements for reporting and submitting Monthly Invoices?

Yes       No       N/A

7) What books of account are maintained? (List by title or in the case of a computer system list the printouts that are equivalent to books of account in a manual system).

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NOTE: A minimum should be the following:

- Cash Receipts Journal, or Cash Receipts/Disbursement Journal combination, and General Ledger.

8) Are the books of account posted on a current basis?  Yes  No  N/A

9) Does contractor run a trial balance on the General Ledger at least monthly?  Yes  No  N/A

10) Are Project Monthly Invoices prepared from the General Ledger?  Yes  No  N/A

Perform a test sample for a month.

<u>Month/Yr</u>	<u>Total Per General Ledger</u>	<u>Total Per Monthly Invoice</u>	<u>Difference</u>
_____	_____	_____	_____

Explanation for any differences:

\_\_\_\_\_  
\_\_\_\_\_

11) Is the contractor reporting accruals?  Yes  No  N/A

12) If yes, is there documentation and/or data to support accruals?

\_\_\_\_\_

13) Is the bank statement(s) reconciled each month?  Yes  No  N/A

14) Is the drawing of checks payable to cash prohibited? (Exception can be for petty cash Account). **Yes**  No  N/A

15) Is signing of checks in advance prohibited?  Yes  No  N/A

16) Is more than one signature required on checks?  Yes  No

**N/A Bonding and Insurance**

1) Are all persons bonded who are authorized by the Contractor to receive or disburse WIOA/ARRA funds, issue financial documents, or checks for payment of program costs?  Yes  No  N/A

2) Bond Coverage is \$ \_\_\_\_\_

3) Does the Contractor maintain general public liability insurance?  Yes  No  N/A

4)

If yes, the amount of the general liability coverage is: \$ \_\_\_\_\_

**Indirect Cost**

1) Does contractor have indirect costs budgeted in any of the programs under contracts? Yes No N/A

2) If yes, do they have an indirect cost agreement on file? Yes No N/A  
(please attach a copy)

**Direct Cost Allocation Plan**

Any WIOA/ARRA Contractor or Subcontractor who operated WIOA/ARRA and non-WIOA/ARRA programs, or who operates more than one WIOA/ARRA project must prepare and maintain on file a detailed plan for allocating any shared costs to the projects that benefit from these costs. This plan must set forth the rationale for all allocations of shared costs and must be used to allocate all costs except for separate disbursements that benefit only one project. Project budgets will, of necessity, be based on estimated costs, but allocations of costs must be based on actual costs incurred.

1) Does contractor have joint cost but not using the indirect cost method? Yes No N/A

2) If yes, does contractor have a written cost allocation plan? Yes No N/A  
(If yes, attach a copy to this document)

3) Does contractor allow making loans from WIOA/ARRA funds to non-WIOA/ARRA funding sources? Yes No N/A

4) Does contractor allow loans to participants? Yes No N/A

5) Does contractor allow loans to staff? (NOTE: Any advance to a staff member for work that has not been earned would be a loan.) Yes No N/A

**Participant Time Sheets**

Participants receiving wages for work must have time sheets to support payrolls.

1) Does contractor require time sheets for participants receiving wages? Yes No N/A  
If yes, do the time sheets have at least the following:

	<b><u>YES</u></b>	<b><u>NO</u></b>	<b><u>N/A</u></b>
(a) Dates covering payroll period?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Time worked recorded each day?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) Total Hours?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) Signature of participant?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e) Signature of supervisor and/or counselor?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2) Is preparation of participant payroll separate from and independent of the delivery of paychecks? Yes No N/A

3) Are payees required to sign register/receipt in order to receive a paycheck? Yes No N/A

4) Does contractor allow the pre-signing of time sheets? Yes No N/A

5) Does contractor allow participants to have control of their time sheets? Yes No N/A

**Staff Time Sheets**



1) Does contractor have time sheets for staff?  Yes  No  N/A

- 2) If yes, are time sheets signed by employee and supervisor? Yes No N/A
- 3) Are time/effort forms being utilized to reflect accurate charges on timesheets? Yes No N/A
- 4) Where applicable, do time sheets reflect actual time worked for different WIOA/ARRA funds(30%/70%), cost categories and non-WIOA/ARRA work? Yes No N/A
- 5) Who verifies time sheets for accuracy? Name: \_\_\_\_\_
- 6) Are changes in pay rates made effective through formal authorization? Yes No N/A
- 7) Does contractor have on file W-4 and NC-4 Tax Forms and I-9's on all staff and participants as appropriate? Yes No N/A
- 8) Are quarterly tax reports submitted in a timely manner to avoid penalty and interest charges? Yes No N/A

**Staff Travel**

- 1) Does contractor require travel vouchers to support all travel? Yes No N/A
- 2) Do vouchers provide for traveler's signature and a signature of approval? Yes No N/A
- 3) Do vouchers need to be accompanied by receipts for lodging and meals when reimbursing for actual costs? Yes No N/A
- 4) Does contractor allow travel advances? Yes No N/A

If yes, how does the contractor control outstanding advances?

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- 5) Is car mileage reimbursed based on actual miles traveled? Yes No N/A
- 6) If yes, what is the rate per mile \_\_\_\_\_/mile

**Other Staff related expenses**

- 1) Does contractor have a retirement/pension plan for staff? Yes No N/A

If yes, are all staff required to participate? Yes No N/A

- 2) Is contractor on the contributing or the reimbursement method for unemployment insurance?

Contributory \_\_\_\_\_ Reimbursement \_\_\_\_\_

- 3) Is contractor billing WIOA/ARRA and setting aside funds in an escrow account for this purpose? Yes No N/A

**Supportive Services:**

Do case managers assist customers in researching and obtaining other available resources before using WIOA/ARRA funds to provide supportive services?

Yes  No  N/A

**Child Care**

- 1) Is child care for participants paid directly to the provider?  Yes  No  N/A
- 2) Is payment based on itemized invoice?  Yes  No  N/A
- 3) Are WIOA/ARRA funds used to reserve a block of child care slots?  Yes  No  N/A

**Participant Travel-**

- 1) Is contractor paying participant travel?  Yes  No  N/A

If yes, list type(s): \_\_\_\_\_

- 2) Is there proper documentation to support costs incurred?  Yes  No  N/A
- 3) Is contractor paying participant travel according to Region D policy?  Yes  No  N/A
- 4) Does contractor's fiscal system provide a procedure for comparing time sheets with travel reimbursements to ensure travel reimbursements are being made only for days attended?  Yes  No  N/A

Perform at least a one week test, comparing time sheets/class schedule with travel reimbursements (please attach the results).

**Other Supportive Services Costs -**

- 1) Are other supportive services offered to clients?  Yes  No  N/A  
Please list: \_\_\_\_\_

- 2) Are these supportive service costs allowable?  Yes  No  N/A

Is adequate documentation maintained including at a minimum:	<b><u>YES</u></b>	<b><u>NO</u></b>	<b><u>N/A</u></b>
(a) Name of participant	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Actual services rendered, and date provided	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) Itemized cost of services rendered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) Signature of provider stating that services were provided	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e) Signature of participant stating that services were received.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(f)			

Do a test on participants to reconcile travel reimbursements, child care costs, or supportive services costs to Employability Plan and other documentation for need and attendance sheets/timesheets. (Please attach the results)

**Participant Benefits**

- 1) Are all participants provided workmen's compensation insurance and/or coverage under a medical and accident insurance policy?  Yes  No  N/A

- 2) Has contractor ensured that participants that are concurrently involved in a work and class training have been adequately covered in both situations? Yes No N/A

**Property Management**

- 1) Does contractor maintain a record of all WIOA/ARRA property? Yes No N/A  
(All items purchased with WIOA/ARRA funds that are defined as non-consumable goods)
- 2) Does contractor take periodic inventories? Yes No N/A
- 3) Date of most recent inventory \_\_\_\_\_
- 4) Has contractor designated a person to manage property, to maintain a property listing, and to check physical inventory?  
Yes No N/A

If yes, name of person: \_\_\_\_\_

**Please attach a copy of the Local Area/WIOA/ARRA inventory and the contractor's WIOA/ARRA inventory of equipment purchased with WIOA/ARRA/NCETP Funds.**

- 5) Does contractor know what to do in case of vandalism or theft of WIOA/ARRA property? Yes No N/A
- 6) Does contractor own any property for which WIOA/ARRA is charged on a shared costs basis? Yes No N/A

If yes, list the property, amount charged, and describe the basis for the charge below.

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- 7) Does contractor use a competitive process when purchasing property? Yes No N/A
- 8) Does contractor get prior approval before obtaining professional services? Yes No N/A
- 9) Does contractor have a written maintenance policy on file? Yes No N/A

If yes, attach.

- 10) Does contractor lease or rent a building or office space which is charged in whole or part to WIOA/ARRA? Yes No N/A

If yes, is there a lease or rental agreement. Yes No N/A **If yes, please attach copies.**

If yes, do the lease/rental agreement and the totals being charged agree? Yes No N/A

- 11) Does contractor own the building for which rent is charged to WIOA/ARRA? Yes No N/A  
If yes, what amount is charged and what is the basis for the charges to WIOA/ARRA:

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**Subcontractor and/or OJT Contractor**

- 1) Does contractor have subcontractors or OJT contracts? Yes No N/A  
If yes, what staff personnel is responsible for monitoring?

\_\_\_\_\_

Name

\_\_\_\_\_

Title

- 2) Who is responsible for comparing timesheets to invoices submitted by employers:\_\_\_\_\_

- 3) Is documentation of monitoring available for review? Yes No N/A  
If yes, describe monitoring or attach a sample.

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# **GRIEVANCE PROCEDURE**

## **Purpose**

To provide a just procedure for the presentation, adjustment and disposition of current employee grievances. To implement this policy and to assure all employees that their complaints and grievances will be answered and determined or decided fairly, quickly, equitably, and without refusal or threat.

**This policy does not apply to those persons whose employment has been terminated.**

## **Procedure**

Whenever any current employee considers himself aggrieved, he shall have the right to discuss the matter with the appropriate official or officials. A grievance is any cause for dissatisfaction outside an employee's control which grows out of employment with High Country Council of Governments.

1. All grievances shall first come to the attention of the immediate Supervisor, who shall make every effort to solve the problem or correct any misunderstanding at this initial level.
2. If the Supervisor cannot solve the problem, the employee may ask to meet with the Executive Director.
3. If informal discussion with the Executive Director is unsuccessful in resolving the grievance, the employee may then appeal to the Board of Directors of High Country Council of Governments, upon written notice to the Chairman, with a copy to the Executive Director. When meeting with the Board, the employee has the right to be accompanied and assisted by any representative of the employee's own choice and expense.

*The following grievance procedure applies to all WIOA customers and is included on the Local Area's Participant Rights Form, which is available to all WIOA customers. This process could potentially apply to all WIOA funded staff.*

## **Your Grievance Rights**

If you feel it is necessary to file a complaint about the program, you should contact the agency Equal Opportunity (EO) Officer no more than 180 days after the incident occurred, and (1) Make every effort to resolve the problem informally. If this is not possible, you should then (2) File the complaint in writing, with full details, to the agency EO Officer. The agency must send you a written decision within thirty (30) days. If you are not satisfied with this decision you have five (5) days to (3) Appeal in writing to: Don Sherrill, High Country Council of Governments, 468 New Market Blvd., Boone, NC 28607. Include your full name and address, a copy of the agency's written response to your complaint, and a statement of areas of disagreement. Mr. Sherrill will send you and your agency a written response. Additional appeal rights should be addressed to NC Division of Workforce Solutions, 313 Chapanoke Road, 4316 Mail Service Center, Raleigh, NC 27699-4316, Attention: Mose Dorsey.

**Note:** The complaint processing procedures shall provide for alternative dispute resolution (ADR). The complainant shall have the choice of pursuing the customary investigation process or using the ADR process. If the parties do not reach an agreement under ADR at the sub-recipient or state level, a complaint may be filed with the Director of the Center for Civil Rights to US Department of Labor, 200 Constitution Avenue NW, Room N-4123, Washington, DC, 20210.

**Note:** Complaints on the basis of handicap follow the procedure explained above, but have different time requirements. If you have a complaint on the basis of handicap, contact the agency's EO Officer, who will give you the information you need. Complaints on the basis of any other forms of discrimination are to be filed directly to: Naomi M. Barry-Perez, Director, Center for Civil Rights, US Department of Labor, 200 Constitution Ave., Room N-4123, Washington, DC 20210.

High Country Local Area expects its WIOA service providers to update their organizational Equal Opportunity policies as changes occur within their organization that impacts their EO policy and procedures. Local Area staff monitors this information as part of our annual WIOA monitoring process to insure that updates are made as necessary. High Country Council of Governments updates its EO policy and procedures as needed. In turn, the Local Area is dependent upon the Division of Workforce Solutions to keep the Local Area apprised of changes at the state and federal levels that impact our EO policy and procedures, so we can make the necessary changes to keep these documents up to date.

### **EO Language Included in WIOA Title I Adult, Dislocated Worker, and Youth Service Provider Contracts:**

- 3.8. Personnel: Equal Employment Opportunity.
- 3.8.1. The Contractor assures that its personnel policy will apply to all persons employed or funded in whole or in part under this Contract, and that merit-based personnel policies are followed.
- 3.8.2. The Contractor agrees not to discriminate on any basis prescribed in the Act or prohibited under state law. The Contractor shall designate a person other than its chief executive as its equal employment opportunity officer, who shall be responsible for the Contractor's nondiscrimination policy and for developing a procedure of investigation of and hearings on equal employment opportunity grievances.

### **EO Language Included in WIOA Incumbent Worker Contracts:**

- 5.9 Non-discrimination. (Company Name) will not discriminate against any employee employed in the performance of this Agreement, or against any applicant for employment because of race, color, religion, sex, marital status, national origin, age, disability, political affiliation, or belief.

### **EO Language Included in WIOA On-the Job Training Contracts:**

- 2.8. Equal Employment Opportunity and Affirmative Action.  
Subcontractor shall take affirmative action and shall not discriminate against any employee, eligible applicant, or training participant, because of sex, race, color, religion, national origin, disability, or political affiliation. Affirmative action shall include, but not be limited to, upgrading employment, demotion and transfer, recruitment and advertisements, layoffs and termination, rates of pay, and selection for training.

**Addendum to WIOA Contracts:** The following language has been added to all WIOA Service Provider Contracts, Incumbent Worker Contracts, and On-the-Job Training Contracts.

*As a condition to the award of financial assistance from the Department of Labor under Title I of WIOA, the grant applicant/subcontractor assures that it will comply fully with the nondiscrimination and equal opportunity provisions of the following laws:*

*Section 188 of the Workforce Innovation and Opportunity Act of 1998 (WIOA), 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 WIOA Title I-financially assisted program or activity;*

*Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the basis 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 grant applicant also assures that it will comply with 29 CFR Part 37 and all other regulations implementing the laws listed above.*



## High Country NCWorks Career Center System

(Reflects Local Area Structure as of July 1, 2015)

**Note: Current Career Center Operators are based on WIA Section 662.400, and the new Operators will be determined by competitive procurement as required by WIOA in the fall 2015.**

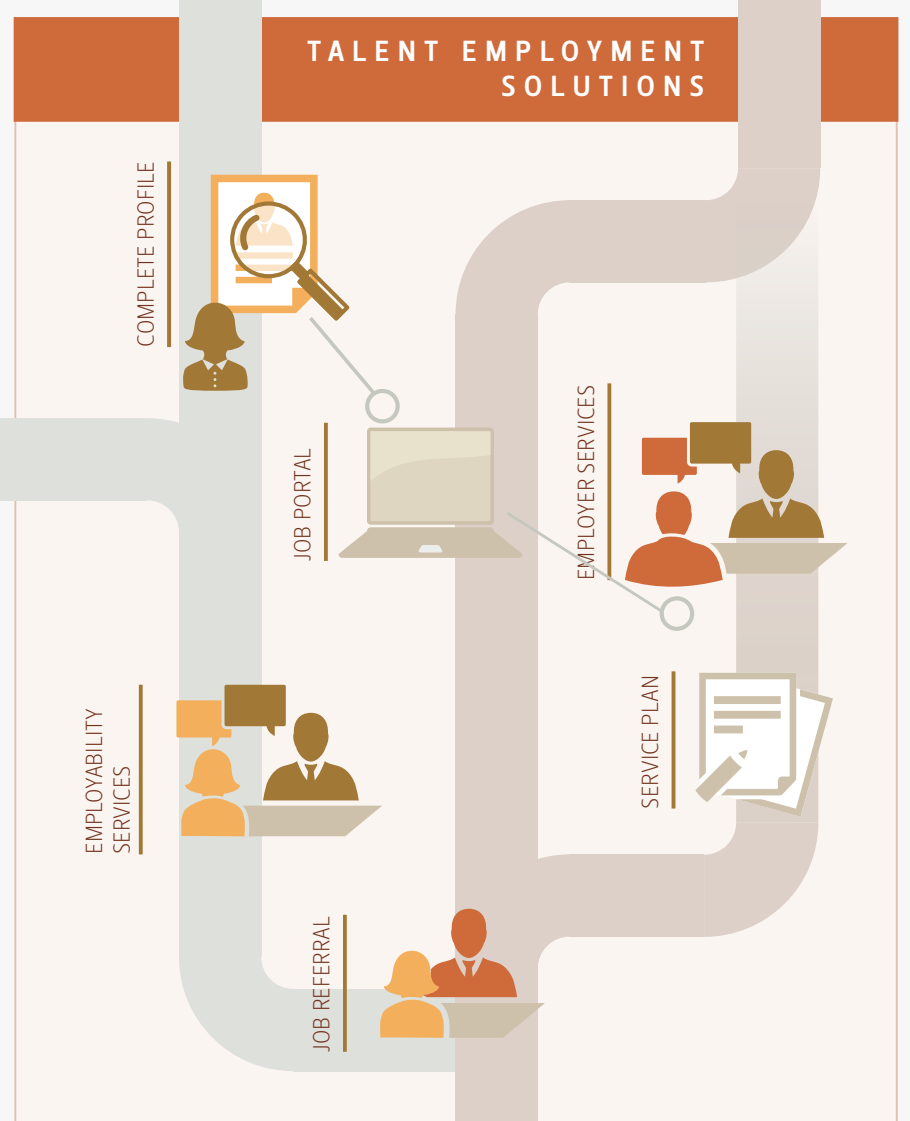
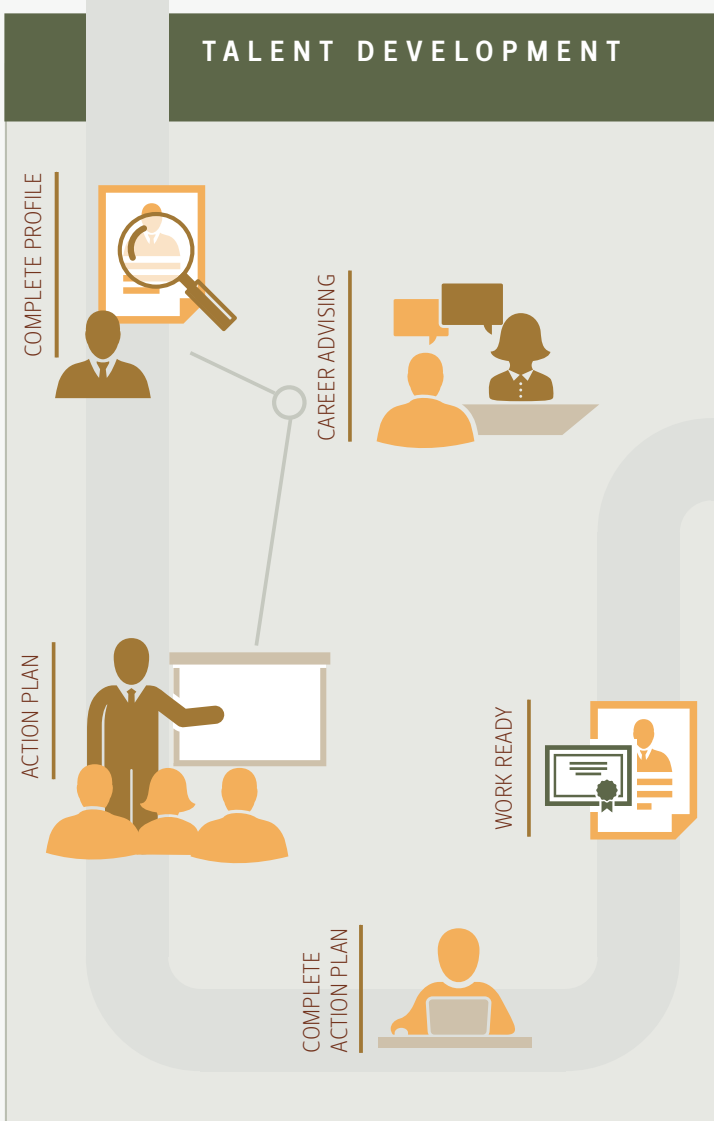
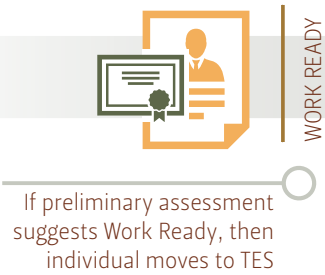
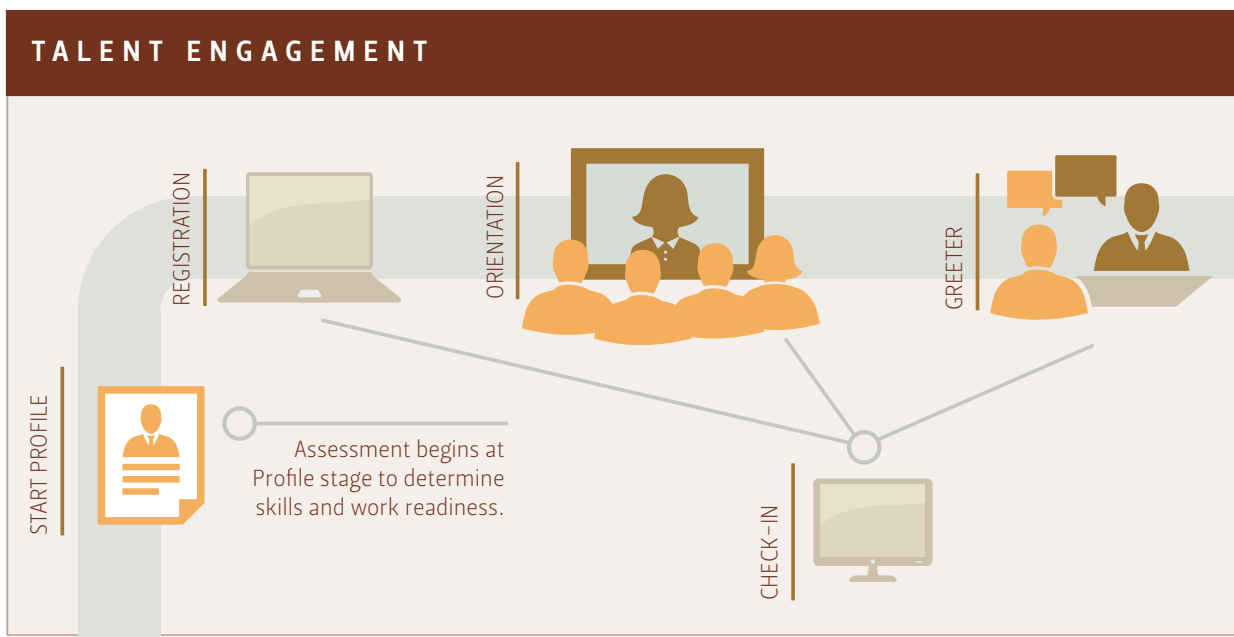
A. One-Stop Location(s) (Address and Hours)	B. Tier 1 or Tier 2	C. On-site Partners	D. Career Center Operator and Method of Selection	E. Provider(s) of WIOA Career Services and Method of Selection	F. Provider(s) and Type of On-site Youth Services	G. Additional Partners
Alleghany NCWorks Career Center 115 Atwood Street Sparta, NC 28675  Hours: Tuesday & Thursday 8-5 (closed 12-1)	Tier 2	Division of Workforce Solutions, Wilkes Community College	<b>Operator:</b> Division of Workforce Solutions, Vocational Rehabilitation, Wilkes Community College  <b>Method:</b> Consortium	<b>Provider:</b> Wilkes Community College  <b>Method:</b> Competitive Bid	<b>Provider:</b> Wilkes Community College  <b>Type:</b> Most Youth Services (see Youth Program Elements chart)	Blue Ridge BDC, DSS, Vocational Rehabilitation, Wilkes Community College
Ashe NCWorks Career Center 626 Ashe Central School Road, Unit 6 Jefferson, NC 28640  Hours: Monday, Wednesday, Friday 9-4 (closed 12-1)	Tier 2	Division of Workforce Solutions, Wilkes Community College, Winston-Salem Urban League	<b>Operator:</b> Division of Workforce Solutions, Vocational Rehabilitation, Wilkes Community College  <b>Method:</b> Consortium	<b>Provider:</b> Wilkes Community College  <b>Method:</b> Competitive Bid	<b>Provider:</b> Wilkes Community College  <b>Type:</b> Most Youth Services (see Youth Program Elements chart)	DSS, Vocational Rehabilitation, Wilkes Community College
Avery NCWorks Career Center 428 Pineola Street Newland, NC 28657  Hours: Monday-Thursday 8:30-5 (closed 12-1); Friday 8:30-12	Tier 2	Division of Workforce Solutions, Mayland Community College	<b>Operator:</b> Division of Workforce Solutions	<b>Provider:</b> Mayland Community College  <b>Method:</b> Competitive Bid	<b>Provider:</b> Mayland Community College  <b>Type:</b> Most Youth Services (see Youth Program Elements chart)	DSS, Mayland Community College, Vocational Rehabilitation, Winston-Salem Urban League, AMY Regional Library

<p>Mitchell NCWorks Career Center 200 Mayland Drive Spruce Pine, NC 28777</p> <p>Hours: Monday &amp; Wednesday 8-5 (closed 12-1)</p>	Tier 2	Division of Workforce Solutions, Mayland Community College	<p><b>Operator:</b> Division of Workforce Solutions</p>	<p><b>Provider:</b> Mayland Community College</p> <p><b>Method:</b> Competitive Bid</p>	<p><b>Provider:</b> Mayland Community College</p> <p><b>Type:</b> Most Youth Services (see Youth Program Elements chart)</p>	DSS, Mayland Community College, Vocational Rehabilitation, AMY Regional Library
<p>Watauga NCWorks Career Center 130 Poplar Grove Road Connector Boone, NC 28607</p> <p>Hours: Monday-Thursday 8-5; Friday 8-12</p>	Tier 1	Caldwell Community College & Technical Institute, Cognitive Connection, Division of Workforce Solutions, Winston-Salem Urban League	<p><b>Operator:</b> Division of Workforce Solutions</p>	<p><b>Provider:</b> Cognitive Connections</p> <p><b>Method:</b> Competitive Bid</p>	<p><b>Provider:</b> Cognitive Connections</p> <p><b>Type:</b> Most Youth Services (see Youth Program Elements chart)</p>	Caldwell Community College & Technical Institute, DSS, Vocational Rehabilitation, Watauga County Economic Development
<p>Wilkes NCWorks Career Center 103 Call Street Extension Wilkesboro, NC 28697</p> <p>Hours: Monday-Friday 8-5</p>	Tier 1	Division of Workforce Solutions, Northwestern Regional Housing Authority, Wilkes Community College, Winston-Salem Urban League	<p><b>Operator:</b> Division of Workforce Solutions, Vocational Rehabilitation, Wilkes Community College</p> <p><b>Method:</b> Consortium</p>	<p><b>Provider:</b> Wilkes Community College</p> <p><b>Method:</b> Competitive Bid</p>	<p><b>Provider:</b> Wilkes Community College</p> <p><b>Type:</b> Most Youth Services (see Youth Program Elements chart)</p>	DSS, Goodwill Industries, Vocational Rehabilitation, Wilkes Community College
<p>Yancey NCWorks Career Center 1040 East US Highway 19E, Suite L Burnsville, NC 28714</p> <p>Hours: Monday-Thursday 8:30-5 (closed 12-1)</p>	Tier 2	Division of Workforce Solutions, Mayland Community College, Vocational Rehabilitation	<p><b>Operator:</b> Division of Workforce Solutions</p>	<p><b>Provider:</b> Mayland Community College</p> <p><b>Method:</b> Competitive Bid</p>	<p><b>Provider:</b> Mayland Community College</p> <p><b>Type:</b> Most Youth Services (see Youth Program Elements chart)</p>	DSS, Mayland Community College, WAMY Community Action, AMY Regional Library

# Functional Areas and Process for Workforce Development System in North Carolina

Job Seeker

Employer



#### PRODUCT BOX

- Case management or service coordination
- Specialized assessments/testing/in-depth interviewing and evaluation
- Development of an individualized employment plan
- Counseling or career planning (individual or group)
- Basic job readiness, short-term pre-vocational skills which may include: communication skills, interviewing skills, punctuality, personal maintenance skills, English as a Second Language (ESL), remediation and workplace literacy
- Literacy activities related to basic workforce readiness
- Adult basic education, GED preparation
- Job search assistance
- Work experience (paid or unpaid)
- Internships
- Referrals to training
- Adult education and literacy activities in combination with other training services and/or job skills
- Customized training
- Entrepreneurial training
- Job readiness training (specific occupation skills)
- Occupational skills training
- On-the-job training
- Programs that combine workplace training with related instruction
- Skill upgrading and retraining



Employed

# Positions and Roles at One-Stop Workforce Center

The positions and roles included in this document outline those that are critical and those that are additional depending on varying degrees of locations and their needs. Some of the responsibilities outlined in the positions may flow back into a critical positions or the Center Manager to make sure continuity and superior service are being delivered. The document outlines the critical need of any One-Stop Workforce Center in North Carolina, and makes additional recommendations on positions that will be needed depending on each areas needs.

**Workforce Center Manager** – will oversee the activities of the entire center and all functional areas. The Center Manager will be responsible for overseeing the daily operation of the center, ensuring compliance of center policies and procedures, hiring center staff when appropriate, ensuring communal areas are functioning properly (i.e. computer labs, training rooms, conference rooms, etc.), managing the center’s operating budget, submitting reports as needed. This role may have the responsibility of other roles in this document depending on size, budget and volume of Center.

The positions and roles below outline the critical needs and minimum positions needed for any One-Stop Workforce Center located in North Carolina.

**NOTE: Roles can be combined into one position for smaller locations.**

Depending on size of area, budget and volume of each Workforce Area, the following positions may be added as needed.

## Roles / Positions in TALENT ENGAGEMENT

Talent Engagement will have a minimum of **2** roles/positions

**Customer Service Representative** – will be responsible for welcoming customers to the career center, monitoring the check-in kiosks, directing customers, conducting orientation sessions, facilitating the registration process, monitoring waiting times for services, and assisting customers with questions.

**Call Center Operator** – is responsible for handling all incoming calls to the Workforce Center. They will be responsible for providing technical assistance to job seekers accessing services virtually, job seekers seeking general information, employers trying to access services, and other calls and issues that come into the center’s main contact number. This position can be located outside the One-Stop Center and shared within a partnership agreement.

Additional Positions to consider adding when needed

**Senior Customer Service Representative [Team Leader]** – responsible for overseeing the operation of the Talent Engagement Area, including: coordinating staff coverage, ensuring compliance of policies and procedures, coordinating staff training, and overseeing the implementation of quality assurance and improvements efforts.

**Resource Specialist Customer Service Representative** – will provide information and advice on additional services, such as: child care, healthcare, transportation, housing, food stamps, etc. as well as assist the Senior Customer Service Representative.

## Roles / Positions in TALENT DEVELOPMENT

Talent Development will have a minimum of **2** roles/positions

**Talent Development Advisor** – will assist customers with their basic job search activities. Duties include: working in both computer labs to assist customers with job search, assist customers with their individual employment plans, refer customers to additional resources, assist with Talent Development activities as needed, and coordinate with Talent Employment Solutions to keep abreast of latest employment trends to ensure businesses get qualified candidates.

**Talent Development Consultant** – will be responsible for assisting customers with their job search activities, career counseling, and referring customers for training and additional resources, program-specific eligibility determination, enrollment, and case management, keeping abreast of latest employment trends, and working closely with Talent Employment Solutions staff.

Additional Positions to consider adding when needed

**Talent Development Supervisor** – responsible for the oversight of all Talent Development activities. Duties include: day-to-day operation of the Talent Development function, completing and submitting reports, ensuring customers' needs are met, handling customer complaints, conducting team meetings, handling all fiscal matters for this department, staff scheduling, staff training, staff orientation, overseeing workshops and program-specific programs. Must coordinate with Talent Engagement and Talent Employment Solutions to stay up-to-date with workforce trends.

**Talent Development Consultant [Team Leader]** – directly oversees program-specific programs. Duties may include developing budgets, following fiscal policies, and ensuring funds are spent, overseeing program-specific program, certifying cases, ensuring performance measures are met, participating in Rapid Response activities, overseeing program staffing, coordinating and conducting program-specific orientations.

**Assessment Specialist** – responsible for conducting all testing and assessments. Duties include: scheduling assessments, distributing results, ensuring testing environment is conducive for testing, ensuring materials needed are available.

**Instruction Coordinator** – responsible for all on-site and on-line workshops, classes and training. Duties include: scheduling workshops, developing curriculum, ensuring workshops are posted on management system, ensuring materials are prepared and available, marketing of workshops, conducting staff training for all function areas, coordinating and conducting networking groups. Must be certified training instructor or facilitator.

**Program Assistant** – provides general administration support to the Talent Development function. Duties include: office management, staff support, including assessments, reports, correspondence, workshops, intake, reception, and coordinating team meetings. This position may also assist customers in both computer labs.

## Roles / Positions in TALENT EMPLOYMENT SOLUTIONS

Talent Development will have a minimum of **3** roles/positions

**Employer Consultant–Outside** – this role is focused as a “hunter” of employers currently hiring. The role will educate employers currently hiring of financial and non–financial resources, including how to use the job posting and matching technology. This role will communicate with and leverage Inside Employer Consultants who will follow–up with the employer and connect them with qualified candidates. The role will also input and maintain employer contacts and ongoing communication, including feedback from employers back into the workforce system.

**Employer Consultant–Inside** – will research and update information on employers that have registered with the One–Stop for job referrals and postings. Key duties include: contacting employers to ensure information is accurate; work with Job Seeker Consultants to pre–screen and refer qualified candidates to employers to fill job openings; serve as an information resource for businesses per workforce solutions; follow–up to ensure employer needs are met; support all activities of the TES function such as job fairs, recruitment initiatives, etc.

**Job Seeker Consultant** – will ensure “work–ready” job seekers have registered in the job–matching application and that their resumes are good quality. Responsible for contacting job seekers regarding openings that correlates with their experience, skills, education, training and follow–up with job seekers per their search status.

Additional Positions to consider adding when needed

**Talent Employment Solutions Supervisor** – will be responsible for the oversight of Talent Employment Solutions activities, coordinating staffing schedules, training and supervising the work of Talent Employment Solutions staff, ensures compliance of policies and procedures, handles all fiscal matters for the department, conducts team meetings, handles customer complaints, completes and submits reports as needed. Works closely with Talent Engagement and Talent Development staff, coordinates business days, networking activities, supports job fairs, recruitment initiatives and other activities related to support business customers and connect job seekers to employment opportunities

**On–the–Job Training Specialist** – will be responsible for developing training plans using industry appropriate software that focuses on closing the skill gap for each customer and ensuring contract compliance and adherence to OJT policy.

**Program Assistant** – The Program Assistant will be responsible for general administrative duties to support the Talent Employment Solutions function and Talent Employment Solutions Supervisor. Other duties include: assisting in the coordination and marketing of events and activities that support employers and job seekers needs.

## Program Year 2015 WIOA Adult/Dislocated Worker Services Providers

<b>WIOA Adult/Dislocated Worker Activity Provider</b> (Organization Name, Address and Telephone Number)	<b>Contact Person</b> (Name, Title and E-mail Address)	<b>County/Counties Served</b>	<b>Type of Organization</b> (State Agency, For-profit, Non-profit, other-specify)	<b>Type of Contract</b> (Cost Reimbursement, Fixed Price, Performance Based, Hybrid, other-specify)
Clay, Wilson & Associates dba: The Cognitive Connection  1109 2 <sup>nd</sup> Ave. SW Hickory, NC 28602  (828) 327-6026	Jim Clay, WIOA Program Administrator  Jim.ClayJr.@thecogcon.com	Watauga	For-Profit	Reimbursement
Mayland Community College  PO Box 827 Spruce Pine, NC 28777  (828) 682-6618	Pam Wilson, WIOA Director  pam.wilson@nccommerce.com	Avery, Mitchell, and Yancey	Community College	Reimbursement
Wilkes Community College  PO Box 120 Wilkesboro, NC 28697  (336) 838-5164	Kim Bell, WIOA Director  kim.bell@wilkescc.edu	Alleghany, Ashe, and Wilkes	Community College	Reimbursement

## WIOA Youth Program Elements

In order to support the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and career readiness for participants, the WIOA Youth shall provide elements consisting of the following.

Please denote whether the required WIOA Program Element will be WIOA funded by the Local Area, provided by referral, or both.

	<b>Program Elements</b>	<b>WIOA Funded</b> (Specify Provider)	<b>Referral by Agreement</b> (Specify Provider)
1.	Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential	WIOA Providers: Mayland CC, Wilkes CC, Clay Wilson	Caldwell CC, Mayland CC SOAR and learning labs, Wilkes CC, Blue Ridge Academy, High Country Academy, Agricultural Extension Agency, VR
2.	Alternative secondary school services, or dropout recovery services, as appropriate	Referral	Caldwell CC, Mayland CC Adult Education and Early College, Wilkes CC, Blue Ridge Academy
3.	Paid and unpaid work experiences that have as a component academic and occupational education, which may include (i) summer employment opportunities and other employment opportunities available throughout the school year; (ii) pre-apprenticeship programs; (iii) internships and job shadowing; and (iv) on-the-job training opportunities	WIOA Providers: Mayland CC, Wilkes CC, Clay Wilson	NC Dept of Commerce Apprenticeship
4.	Occupational skill training, which shall include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area involved	WIOA Providers: Mayland CC, Wilkes CC, Clay Wilson	Local training institutions such as WCC, MCC, CCC&TI, ETSU, SCC, etc.
5.	Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster	WIOA Providers: Mayland CC, Wilkes CC, Clay Wilson	Local training institutions and partners, HRD, Continuing Ed, curriculum, CRC, Public Schools CTE Pathways
6.	Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate	WIOA Providers: Mayland CC, Wilkes CC, Clay Wilson	Partnerships with local events and organizations, Chambers of Commerce, etc.
7.	Supportive services	WIOA Providers if not available by referral to	Referrals to DSS, Smart Start, Faith Based, VR, Civic Organizations,



		partners	BROC, WAMY
8.	Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months	WIOA Providers: Mayland CC, Wilkes CC, Clay Wilson	MY Mountain Friends, Communities in Schools
9.	Follow-up services for not less than 12 months after the completion of participation, as appropriate	WIOA Providers: Mayland CC, Wilkes CC, Clay Wilson	NA
10.	Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate	WIOA Providers: Mayland CC, Wilkes CC, Clay Wilson	New River Behavioral Health, Mental Health Services
11.	Financial literacy education	WIOA Providers: Mayland CC, Wilkes CC, Clay Wilson	Local banking institutions, FDIC Money Smart
12.	Entrepreneurial skills training	WIOA Providers: Mayland CC, Wilkes CC, Clay Wilson	ASU Center for Entrepreneurship, Small Business Centers, Employers
13.	Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services	WIOA Providers: Mayland CC, Wilkes CC, Clay Wilson	NCWorks, Local Libraries, Employers
14.	Activities that help youth prepare for and transition to postsecondary education and training	WIOA Providers: Mayland CC, Wilkes CC, Clay Wilson	Local training providers College Readiness Programs, GEAR Up, Local Public Schools

## Program Year 2015 WIOA Youth Services Providers

<b>WIOA Youth Activity Provider</b> (Name, Address and Telephone Number)	<b>Contact Person</b> (Name, Title and E-mail Address)	<b>County/Counties Served</b>	<b>Type of Organization</b> (State Agency, For-profit, Non-profit, other-specify)	<b>Type of Contract</b> (Cost Reimbursement, Fixed Price, Performance Based, Hybrid, other-specify)
Clay, Wilson & Associates dba: The Cognitive Connection  1109 2 <sup>nd</sup> Ave. SW Hickory, NC 28602  (828) 327-6026	Jim Clay, WIOA Program Administrator  Jim.ClayJr.@thecogcon.com	Watauga	For-Profit	Reimbursement
Mayland Community College  PO Box 827 Spruce Pine, NC 28777  (828) 682-6618	Pam Wilson, WIOA Director  pam.wilson@nccommerce.com	Avery, Mitchell, and Yancey	Community College	Reimbursement
Wilkes Community College  PO Box 120 Wilkesboro, NC 28697  (336) 838-5164	Kim Bell, WIOA Director  kim.bell@wilkescc.edu	Alleghany, Ashe, and Wilkes	Community College	Reimbursement

## Supportive Services Policy

Supportive services for adults, dislocated workers, and youth are defined at WIOA Sec. 3. Definitions (59) and Sec. 134(d)(2). Supportive services payments are allowed when necessary to enable an individual to participate in activities authorized under WIOA Title I that are not otherwise available from other sources and when the participant is unable to pay for the necessary expense themselves. Case managers must substantiate and document the need for the supportive services for the enrolled participant. Expenses incurred prior to enrollment are not allowable supportive services without prior authorization from WDB staff.

Career Centers should have an up to date listing of available resources for customers and staff to refer to that is inclusive of all known resources.

In most cases, supportive service payments are to be paid directly to the vendor providing the service, with staff having all the necessary documentation to support the costs. The reimbursement of mileage for transportation costs are typically paid directly to the participant or to an individual that has provided transportation for the participant in order for them to participate in WIOA Title I activities.

The types of supportive services allowed include:

- Transportation
- Childcare and dependent care
- Emergency Assistance to include: housing; utility bills (electric, water, heating); repairs or tires for a participant's car; car insurance; appropriate work attire (does not include uniforms required for training which is considered other training costs); eye glasses.

Emergency assistance is often a one-time emergency expense paid to allow a person to continue participating in Title I activities that cannot be paid by the participant without WIOA assistance.

Supportive services payments may be made available on behalf of adults and dislocated workers who are in follow-up services (follow up begins on the 1<sup>st</sup> day of employment). Adults and dislocated workers are not eligible for supportive service after program exit. Needs related payments **are not** allowed for adults and dislocated workers in the High Country region.

Supportive services may be offered to youth during enrollment and after exit while in their 12 months of follow-up if it supports their success.

Yearly and Lifetime Limit: Supportive services for emergency aid have an annual limit per participant of up to \$250 per year with a lifetime limit of \$750. Currently there is not a funding limit on transportation and childcare assistance. However, based on local budgets this may become necessary during the year.

In extreme circumstances, when the participant has used the yearly or lifetime limit or has an emergency need that exceeds the limit, the service provider can submit a request by email to WDB staff for approval. Approval must be requested and received prior to making the expenditure. It is incumbent upon the service provider to ensure that the customer understands that if approved, this is a one-time expenditure. The request should include the following information: participant name; program; amount of request and what is for and why it is needed; along with previous emergency aid received.

Documentation: Service providers are to maintain a stringent attitude towards documentation of all supportive services provided. Supportive services are to be documented in the client tracking system each time a supportive service is provided with notes documenting when it occurs with an explanation of the need, amount, effort to locate other resources and description of service provided. Copies of all invoices and travel/attendance logs should be maintained in participant files. A Supportive Service activity should also be opened during the timeframe that is covered.

Transportation: Assistance with transportation is allowable if it is necessary for a participant to continue their participation in WIOA services such as training, workshops, work experience, etc. Assistance can be provided to an individual using the mileage reimbursement rate or by using a paid vendor such as the local transportation authority where the service provider is billed at an agreed upon rate. An invoice/attendance form is to be used to support these costs that are signed by the participant, the school instructor or worksite supervisor, and the individual providing transportation (if different from the participant) that verifies the person was in attendance on the days reported along with the daily miles driven. NOTE: If an individual is providing transportation for multiple participants, duplicate reimbursement is not allowed.

Mileage reimbursement will be paid using the following daily rates:

0-10 miles/day	\$ 2.50
11-25 miles/day	\$ 5.00
26-40 miles/day	\$ 7.50
41-75 miles/day	\$10.00
76+miles/day	\$12.50

Childcare and Dependent Care: Assistance with childcare and dependent care is allowable when necessary for a participant to continue their participation in WIOA services such as training, workshops, work experience, etc. or during the initial obtainment of employment. Service providers must first refer the participant to the local Department of Social Services for assistance. Payments can be made directly to a daycare or to an individual providing childcare services at the agreed upon average local rate. If childcare assistance is available from DSS and a parent fee is required, this is an allowed supportive service cost.

**High Country Workforce Development Board**  
**ON-THE-JOB TRAINING POLICY**  
Effective July 1, 2015 (Revised May 28, 2015)

## **What is On-the-Job Training?**

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On-the-Job Training (OJT) is a work-based training opportunity for adults, dislocated workers, and youth customers who are eighteen years of age or older that leads to full-time employment. OJT is only offered if a WIOA participant is eligible for *training services* provided through the Workforce Innovation and Opportunity Act (WIOA). OJT contracts encourage employers to provide occupational training that results in hiring unemployed, underemployed or dislocated persons. OJT contracts:

- Provide training for the WIOA participant in exchange for a reimbursement of up to 50 percent of the wage rate to compensate for the employer's extraordinary costs for training a worker who has an identified skills gap.

**NOTE: Effective July 1, 2015, the sliding scale that allowed reimbursement up to 90% is no longer allowed.** The maximum reimbursement rate effective is up to 50%, unless the governor and the board approves a higher rate up to 75%. WIOA specifies factors that must be considered when determining whether or not to increase the reimbursement rate to 75%. Once guidance is received about the use of these factors, High Country will follow the new requirements for increasing the reimbursement rate.

- Are contracted for a limited period of time for a participant to become proficient in the occupation for which the training is being provided.
- Are developed with employers in the public, private or non-profit sector. **NOTE: WIA Job Driven National Emergency Grant (NEG) does not allow public sector OJT. Also note that with this NEG, OJTs may not be developed with the following types of employers: gambling establishments, swimming pools, aquariums, zoon, and golf courses.**
- Require that participants uphold the standards of the Hatch Act. A participant cannot participate in any activity that is considered a political activity during working hours. This includes the following: soliciting, transporting voters, distributing campaign materials, working on or developing campaign materials, etc.
- Will not employ participants to carry out the construction, operation or maintenance of any part of a facility that is used or will be used for sectarian instruction or as a place for religious worship, nor will be participant be required to participate in religious activities.
- Must be conducted at the employer's place of business or a related location. An

employer may not subcontract the OJT to another organization.

No individual (neither new hire nor incumbent) may enter an OJT position if a member of his/her family is engaged in an administrative capacity with the OJT employer, including a person with selection, hiring, placement or supervision responsibilities for the OJT trainee.

The OJT employer will maintain and make available for review all time and attendance, payroll, and other records to support amounts reimbursed under OJT contracts. Records must be maintained and available for review for a period of five years from the completion date of the contract.

## **WIOA Service Provider OJT Coordination**

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In the High Country workforce development region, WIOA service providers employ both Business Services Representatives (BSR) and career counselors (also identified as career development facilitators or case managers.) Both have a role to play in OJT services.

Generally, the BSR conducts employer outreach/marketing and recruitment of OJT participants, negotiates the OJT contract (including development of training plan in conjunction with employer), and maintains employer contact for the duration of the OJT contract (including collection of invoices, time sheets, and monthly employee performance evaluations), and ensures that an employer file is maintained at the work site and is available for review.

The career counselor determines participant eligibility, maintains a relationship with the participant throughout and beyond the contract period, and maintains participant records. As appropriate, the career counselor may assist the participant with supportive services (refer to Supportive Service Policy) during the OJT until the first paycheck is received.

The BSR and career counselor collaborate on the selection of a suitable candidate for a specific OJT, coordinate contact with employer and participant throughout the contract period; and confer with one another to determine appropriate course of action when either identifies a potential problem. In addition the WIOA supervisor conducts at least one formal on-site OJT monitoring review.

Each WIOA service provider is to maintain a written plan, for the specific delineation of duties to ensure proper coordination and non-duplication of services. Service providers are responsible for appropriate outreach and recruitment of OJT participants as well as employer marketing strategies that best meets the needs of their service area.

## **What makes an individual suitable for OJT?**

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OJT is primarily intended to serve unemployed individuals as a way to obtain full-time, skilled employment.

However, an OJT contract can be an extraordinary tool for employed adults who meet WIOA eligibility criteria for intensive services and for dislocated workers who are

currently underemployed based on the information in this section.

To receive training services and participate in an OJT contract, **all individuals must:**

- a) Have met the eligibility requirements for intensive services and must have received an assessment. In addition, an Individual Employment Plan must have been developed.
- b) Have been determined to be in need of training services with consideration given to: the skill requirements of the occupation, the academic and occupational skill level of the participant, prior work experience, and the participant's Individual Employment Plan. The results of objective assessment, as documented on the individual's Individual Employment Plan, must capture the past work history of the applicant; assess the test results; capture additional information from the applicant about past work experience, hobbies, and volunteer experience; and identify skill strengths and weaknesses of the applicant. The objective assessment must include documentation as to the new skills to be acquired during training and how skill gap deficiencies will be overcome with the training.
- c) Select a field of training that is directly linked to employment in the local labor market area where the individual is willing to locate.
- d) Be unable to receive/obtain grant assistance from other sources to pay training cost.
- e) Be a WIOA-enrolled individual after having been determined eligible for WIOA services with priority given to low income individuals, recipients of public assistance, veterans and eligible spouses, and dislocated workers.
- f) In addition, in cases where an individual is referred as a potential candidate for OJT by an employer (reverse referral), that individual may be considered for OJT with that employer only after the individual has met eligibility requirements for intensive services, and has received an assessment, and for whom an Individual Employment Plan has been developed which indicates OJT is appropriate.

**Employed Adults:** If adult participant is already employed, eligibility for OJT is limited to

- a) those customers whose current employment does not meet the self-sufficiency standard adopted by the High Country Workforce Development Board. (The Board's Self-Sufficiency Policy for Adults defines self-sufficiency as a wage that equals at least 200% of the lower living standard income level and where access to family health insurance benefits is available through the employer); **and**
- b) WIOA regulations, are met (basic on-the job training); **and**
- c) The OJT relates to the introduction of new technologies, new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes identified by the Workforce Development Board.

**Dislocated Workers who are underemployed:** Dislocated workers who have obtained employment but are below self-sufficiency are eligible for OJT. The High Country Workforce Development Board's defines self-sufficiency for Dislocated Workers as 90% of the participant's compensation level at the time of dislocation and the availability of family health insurance. Dislocated workers who have accepted employment which does not meet these standards is eligible for an OJT contract when b) and c) above are also met.

## **Choosing the Right Employer**

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An OJT contract has certain criteria that an employer must meet in order to be eligible to receive WIOA funds to reimburse extraordinary training costs. If an employer has “exhibited a pattern of failing to provide prior OJT participants with continued long-term employment, wages, benefits, and working conditions, a contract cannot be developed.” (663.700) The High Country Workforce Development Board has established the following policy for complying with this provision:

- 1) A pre-award checklist will be used which requires the review of retention patterns of employers who have had two or more previous OJT contracts under WIOA. Where a pattern of failure to hire without just cause is apparent, an OJT contract cannot be developed.
- 2) OJT contracts will specify that successful OJT participants will be offered long-term employment with wages, benefits and working conditions equal to those provided to regular employees with similar experience and responsibility. The pre-award checklist also requires review of past compliance with this requirement. No OJT contract will be developed with an employer who has previously exhibited a pattern of failing to meet this requirement.

The Workforce Development Board also provides guidance regarding OJT pre-award review of relocating new and expanding industries:

- WIOA service providers will not solicit a company or use funds to entice a company to relocate to or expand in the service area.
- For a business that is relocating to the area, the employer must certify that no person was displaced as a result of the relocation of the current business within the 120 days immediately preceding contract agreement date.

## **OJT Employer Performance Expectations**

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The goal of on-the-job training is that the employer retains the OJT trainee as a regular employee following the successful completion of training. If an employer has had previous OJT contracts, the service provider staff are expected to access the employer’s past performance in training employees under OJT. The WIOA service provider will not develop an OJT contract with an employer who has repeatedly failed to meet performance standards. The employer must exhibit a history of long-term employment of trainees as regular employees with wages and similar working conditioned at the same level. Completion and retention rates of at least 75% are expected. Retention is defined as continued employment of at least three months following the completion of the OJT contract.

## **Conditions governing OJT payments to employers**

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Conditions governing the OJT payments to employers:

- a) OJT payment is deemed to be compensation for the extraordinary training costs and lower productivity of the OJT participant.



- b) Typically employers may be reimbursed *up to* 50% of the wage rate of an OJT participant for these extraordinary training costs and their associated additional supervision requirements. However, the governor and the Workforce Development Board may approve a higher reimbursement rate up to a maximum of 75%. If this change is approved by the governor and the Board, High Country Workforce Development Board will communicate the change to local NCWorks Centers and the WIOA service providers either through an issuance or a revised local OJT policy.
- c) Employers are not required to document such extraordinary costs.

## **Determining the length of the Contract: Employer Agreement**

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The *Specific Vocational Preparation* or SVP data found in the O\*NET Online database for that particular occupation will be used and will be adjusted to determine the length of training necessary to acquire the needed skills for each OJT participant. The SVP, published by the U.S. Department of Labor, provides guidance in calculating training time based on the type of occupation. The higher the SVP code, the higher skilled or more complex the occupation; therefore, a longer training time would be expected. Under WIOA legislation, OJT contracts can be developed for occupations with SVP levels from 3 to 8. Other occupations are excluded because the training is considered to be either too simple or too complex.

The following chart reflects the OJT time allowed for each Specific Vocational Preparation (SVP) Level:

<u>SVP Level</u>	<u>Hours of Training Permitted</u>
3	Over 1 month up to and including 3 months. (Three months equal 520 work hours)
4	Over 3 months up to and including 6 months. (Six months equal 1,040 work hours)
5	Over 6 months up to and including 1 year (One year equals 2,080 work hours)

**NOTE: WIOA OJT training period cannot exceed 6 months/1,040 hours.**

**OJT contracts may not be written for a job below a SVP Level 3, a job above SVP 8, for fewer than 240 hours nor for more than 1,040 hours. For the Job Driven NEG, the training period may not exceed six (6) calendar months.**

In every case, training hours are defined as time worked. Work time is to be recorded in terms of hours.

The following example illustrates the computation of **maximum** OJT costs:

Credit Clerk: DOT Code 205.367.022, SVP level - 4 has negotiated training time of 800 hours.

Starting wage rate - \$10.00

One-half starting wage rate per training.  $\$10.00 \times 800 \text{ hours} = \$8,000.00$

Divided by 2 = \$4,000.00

The SVP Chart shows that an SVP level of four has a maximum training time of 1040 hours. In this example, the employment representative accrued a savings of \$1,200.00 by negotiating the OJT contract for fewer than the maximum hours permitted. The employer got reasonable training time by negotiation, and the accrued savings can be used to help fund an OJT slot for another participant.

When determining the period of time needed for a WIOA OJT participant to acquire the necessary skills for the identified job tasks, consideration is to be given to recognized reference data including, but not limited to, the O\*NET Online database "Dictionary of Occupational Titles." In addition, a participant's, Individual Employment Plan, education, skills (determined through assessment(s), prior work experience, and relevant hobbies are all to be taken into consideration.

**NOTE:** Employer negotiations must include a reasonable amount of time for orientation, coaching, and counseling activities by WIOA staff since these activities are frequently critical to the success achieved by many participants. These sessions may be most reasonably conducted at the participant's worksite, but are to be managed in such a way that maximizes confidentiality, that does not call undue attention to the participant's WIOA status, and does not distract from productivity. Conducting these sessions during a scheduled break or immediately preceding or following scheduled work hours are viable options.

### **Providing upgrading and retraining through OJT**

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Training a participant in the same occupation for virtually or nearly the same work from which the participant had been laid off or separated from is not allowable when the participant already has the skills required for the job. In order to conduct skill upgrading and retraining, conditions for eligibility and participation must be met and there must be a demonstrable difference between the job and skill requirements of the upgraded job for which the participant is being trained and those of current or prior employment. The WIOA service provider will refer to the SVP and assessment results to determine prior skills of the participant.

### **What occupations are eligible for OJT contracts?**

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OJT may only be offered in those occupations which provide opportunities not otherwise available, lead to economic self-sufficiency and provide stable employment. Occupations that are eligible for WIOA funding include:

- a) Occupations which offer a reasonable expectation of continued employment in the occupation for which training is offered.
- b) Occupations which are sufficiently skilled to require a training period of at least

- two hundred and forty (240) hours duration.
- c) Occupations that meet prevailing standards with respect to wage, hours and conditions of employment.
  - d) Occupations on a promotional line that do not infringe in any way upon the promotional opportunities of currently employed individuals.

For all customers, training must be in an occupation which provides new skills distinct from those already possessed by the customer. The Board encourages placement of OJT's in areas that have been identified as "high growth" employment sectors.

## **Occupations that are not eligible for OJT contracts**

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Occupations for which training **will not be approved** include, but are not limited to:

- a) Occupations that have not traditionally required specific occupational training as a requirement for employment.
- b) Occupations dependent on commission as the primary source of income. (This does not exclude those jobs which have a guaranteed base wage of at least the federal minimum wage in addition to commission pay and such guaranteed wage will continue after the training period.)
- c) Intermittent seasonal occupations.
- d) Occupations requiring less than 240 training hours or more than 1,040 reimbursable training hours.
- e) Part-time occupations. (For definition purposes, full-time employment is the 40-hour week, except where fewer hours are normal to the occupation, but in NO case less than thirty-two (32) hours per week).
- f) Occupations that are currently, or will be, included under an employee-leasing contract whereby job openings for a particular occupation at a business facility are filled by staff of the leasing contractor.
- g) Occupations where adequate supervision and/or monitoring are not available.

## **Length of Training**

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Refer to page 5, Determining the Length of the OJT Contract

## **Participant Wages**

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In no event will wages paid to WIOA OJT participants be less than the highest of the following:

- the federal minimum wage
- the State or local minimum wage
- prevailing wage rates provided to individuals in similar positions
- minimum entrance wage rate for inexperienced workers in the same occupation
- the wage rate required by applicable collective bargaining agreements
- prevailing rate established by the Davis-Bacon Act.

**In addition, the High Country Workforce Development Board's minimum wage requirement is \$10.00 per hour for OJT participants unless approved by High Country Workforce Development Board staff on a case by case basis.**

When an OJT participant works overtime, reimbursements are made to the employer at the regular hourly rate. The additional half-time rate cannot be reimbursed. The amount of the reimbursement is the total number of hours worked times the reimbursement rate. For example, if a participant works 40 hours per week at \$10.00 per hour, the reimbursement is \$200.00 (40 x \$10.00 divided by 2). If that participant works 60 hours in one week, the total reimbursement payment is still based on \$10.00/hr for 60 hours rather than \$10.00/hr for 40 hours plus \$15.00/hr for the additional 20 hours. The additional 20 hours of overtime work is calculated into the total number of training hours to be reimbursed.

### **OJT Contract/Employer Agreement Modifications**

A change or modification can be made to the OJT contract/employer agreement during the training period if necessary. A modification is necessary to increase the OJT contract amount, to change the contract closing date, or to increase the number of training slots. The WIOA service provider and the OJT employer must mutually agree upon the modification. Authorized signatures of both parties must be on the modification.

### **Skills Gap Analysis/Training Plan Development**

An individualized OJT Training Plan must be developed for the acquisition of skills that the trainee does not already possess. This plan will contain occupationally specific skills that the employer requires for competency in the OJT occupation. An analysis of the trainee's prior work history and the job skills already possessed must be compared to the job skills/job description the employer requires in the OJT occupation. The resulting gap in skills will be the basis for the development of the Training Plan. The Specific Vocational Preparation(SVP) data found in the O\*NET Online database for that particular occupation will be used and adjusted to determine the length of training necessary to acquire the needed skills. Each skill description needs to be concise, yet comprehensive, and the individual tasks must be measurable and observable. The specific types and sources of information used to identify the scope of the skills gap must be included in the participant's case file.

In the High Country Workforce Development Board service area, WIOA service providers have a choice of three assessment tools to conduct a skills gap analysis and provide adequate documentation of the process used to develop the Training Plan. These include:

- (1) "Prove It!" an internet-based assessment tool used to determine an individual's level of skills in a particular occupation and to document skill deficiencies;
- (2) [www.myskillsmyfuture.org](http://www.myskillsmyfuture.org) which has been developed by the US Department of Labor, and
- (3) O'Net.

The training plan is used to assign an estimated length of time it will take to acquire the skill for each task. The total number of hours for each individual skill will total the negotiated length of the contract/employer agreement. The standard training hours and actual training hours per

task may vary depending on the current skill level of the participant. The training plan will also identify the individual who will provide the training. The training plan is normally completed with the assistance of a representative of the company and is always reviewed with both the employer and participant before the contract is signed. The participant is to be given a copy of the training plan. The WIOA service provider is responsible for maintaining close contact with the trainee, the employer, and the person(s) assigned to train the participant to ensure that proper skills are being obtained as outlined in the training plan. Such contact is to occur at least monthly and must be documented in participant case notes. It is the mutual responsibility of the WIOA service provider's business services representative and the participant's career counselor to maintain close coordination to identify any potential areas of concern regarding progress toward skill development and/or individual counseling/coaching services needed.

The OJT contract (also known as the Employer Agreement) is completed following negotiation of contract terms. The agreements must contain the name, address, IRS number and phone number of the employer and must also include reimbursement amount, start date and termination date of the contract. The job description and training plan for each individual participant are to be attached to the contract/employer agreement (copies in both the employer and customer file).

It is incumbent upon the WIOA service provider to be aware of any problems that arise during the training period and to assume primary responsibility for working with both the employer and the participant to resolve these issues. Problem-solving dialogue needs to include the WIOA Business Services Representative and/or career counselor and may include the WIOA supervisor. It is the WIOA service provider's responsibility to cultivate and maintain positive working relationships with both employer and participant and to ensure that both are following through on their responsibilities and doing their best to carry out the objectives of the plan.

The trainee's progress under an OJT contract/employer agreement will be officially monitored at least once during the training period by the service provider's WIOA supervisor or designee who has not been involved in the development or implementation of the OJT.

## **How to Complete OJT Invoices**

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OJT invoices are used to document the number of hours and rate of reimbursement to the employer. OJT employers are expected to complete the timesheet and trainee evaluations on a monthly basis. The participant's immediate supervisor is expected to complete and sign the timesheet and the evaluation. Copies of OJT invoices, timesheets and evaluations are to be maintained in both the employer file and the OJT participant's customer file.

The calendar on the timesheet is completed based on the dates the participant trained during the month. For example, if the participant trained 8 hours on Friday, March 5, a 5 is placed in the corner of the block on the first row of the calendar under that date. A large 8 is also placed in the square. These numbers show that the participant trained 8 hours on March 5. This procedure is followed for the entire month. WIOA funds are not to be used to pay employers for benefits such as sick leave, annual leave or holiday pay since no training is taking place at this time.

The immediate supervisor completes the evaluation based on the participant's work performance during the month. Any rating of a 4 or 5 must include a written explanation. Each monthly evaluation is to be discussed with the participant in order to communicate concerns and receive feedback. Only after the timesheet has been reviewed and the evaluation discussed, do the supervisor and employee sign the evaluation document.

The participant's career counselor is also expected to review each monthly employee evaluation and to discuss inadequate progress toward goals with the participant. Similar discussions are expected to be conducted with the participant's supervisor by designated service provider staff.

The WIOA service provider completes invoices following receipt of all required employer documentation, as designated in the employer agreement.

Each WIOA service provider will have a system for ensuring the receipt of OJT invoices from employers in a timely manner for processing by the service provider's finance office.

Reasonableness of Cost: The Act provides that each contract "specify the types and duration of on-the-job training and other services to be provided in sufficient detail to allow for a fair analysis of the reasonableness of proposed costs..." WIOA regulations prohibit the imposition of a requirement on employers to document extraordinary costs. Such a record-keeping burden would unnecessarily make OJT a less desirable training option. WIOA regulations require no more record keeping of an employer that is already required of the employer for other purposes, (e.g., an employer would have to maintain payroll records to demonstrate that a participant worked the number of hours that were billed, but payroll records are already required to be kept for a variety of other federal and state purposes).

## **Official Monitoring Reviews**

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The monitoring system for OJT will at a minimum include the following: compliance with the training plan, participant's eligibility checklist, comparison of time and attendance with invoices, comparison of contracted wage rate vs. wages paid, and actual start date of compared to contract/employer agreement start date. Other areas of monitoring may include EO issues, safety procedures, participant interview, and/or supervision.

A monitoring review is to be conducted whenever there are indications of problem areas, i.e., layoffs or rumors of layoffs, decrease in hours of reported training time, complaints from participant (either formal or verbal complaints), complaints from the employer (either formal or verbal), rumors of an employer filing bankruptcy, etc.

All monitoring reviews must be documented. Written monitoring documentation will become a part of the contract/employer agreement file. The report is to include: all areas of non-compliance with the contractual agreement, review of the eligibility of participant(s) enrolled under the contract, any corrective actions necessary, and the findings of any ineligible participants.

## Individual Training Account (ITA) Policy

The High Country Workforce Development Board requires the use of ITA's for adults and dislocated workers who receive training services funded by WIOA to include the costs of tuition, books, and/or training fees with the following limitations:

- The Workforce Development Board's primary intent is to pay for up to two years of training through the ITA process. The WDB acknowledges that some two year degree programs may take longer than two years to complete. Training to become a Registered Nurse is an example. Longer-term training programs (four year degree) are allowed on a case by case basis to be reviewed by the Service Provider to ensure the programs meet the criteria established in the Occupational Demand Areas for our Local Area and that funds are available outside of WIOA to supplement the ITA maximum amount allowed to complete the training.
- The targeted curriculum program must be for an occupation that has been determined to be in demand and the successful completion of the training program results in a degree, diploma, certification and/or license. Service Providers are to assist customers in making informed consumer choices of eligible training providers by use of NCWorks.
- The maximum amount to be spent on an ITA is \$4300 per customer per year. In addition, the maximum lifetime amount to be spent on an ITA is \$8600 per customer. The actual ITA expenditure will not exceed the cost of the training program (tuition, books, and fees). WIOA funding is to be used to pay the cost of training only after other financial training resources are applied (such as Pell/TAA/scholarships/grants) or cannot be obtained.
- Other costs associated with training completion (such as supplies, testing fees, immunizations) are to be charged as other training costs and are non-ITA expenses. Continuing Education classes and non-curriculum classes are also treated as non-ITA training expenses.
- Training costs will not be paid until after the Pell Grant application has been completed each year and notification has been received regarding the award of the grant, unless approval is granted from the Local Area. If the Pell Grant awarded is less than the cost of the training, the ITA will only cover the difference between the cost of the training and the Pell Grant amount. If the customer is clearly not eligible for a Pell Grant, a voucher will be issued on a per semester basis. The Pell Grant application is to be completed electronically.
- ITA's are issued for training on a semester by semester basis. Customers are made aware that funding changes from year to year may affect WIOA's ability to fund training for the entire training time.
- The WIOA service provider will be responsible for issuing the training voucher. Payment will be made directly to the training provider.
- The Financial Award Analysis form is to be completed by the financial aid office of the training provider and submitted to the service provider with information related to training costs and available funding sources for each year of training.
- In the event that the intensive service provider is the same agency as the training service provider, measures will be taken to ensure that the ITA is based on customer choice.
- The service provider is expected to maintain a tracking log of (1) all ITA expenses; (2) field of study and progress toward completing the training program; and (3) achievement of a credential, as defined by WIOA. Both the High Country Local Area and the NC Division of Workforce Solutions monitor this tracking system.
- Individuals who are not eligible for Pell assistance due to default on other federal student loans are not eligible for WIOA tuition assistance. Individuals who are placed on Pell probation due to grades may receive assistance as determined on a case by case basis by the service provider under consultation with WDB staff.

## **Youth Incentive Policy**

Incentives provide a means to recognize and reward an active youth's success while participating in Workforce Investment Opportunity Act youth services. Youth funds may be used to provide incentives for recognition and achievement to eligible youth provided it is made a part of the participant's individualized assessment and service strategy. In general, non-cash incentives should be used. However, incentives can be in the form of cash payments to youth when it is deemed appropriate. Documentation for each youth must include what achievement or recognition is being awarded, the type of incentive awarded, along with supplemental data to support the achievement (copy of grades, work-site evaluation, attendance record, etc.) along with an Incentive activity keyed into NCWorks.

Incentives may be provided to those youth enrolled or in active follow-up. Achievements completed prior to enrollment do not qualify for incentives.

The following examples merit the award of incentives:

- Academic achievement (Honor Roll/Dean's list; B or better average; special achievement)
- Participation in specific WIOA activities, including activities leading to attainment of leadership and citizenship skills such as workshops, trainings, volunteer work, etc.
- Frequent contact and attendance with case manager (at least on a monthly basis for consecutive months)
- Referrals/recruitment of others that result in WIOA enrollment
- Increase in Educational Functioning Level
- Attainment of secondary school diploma or equivalent
- Successful completion of work experience
- Successful consecutive months of job retention
- Successful completion of approved HRD workshops or other skill development courses
- Obtaining a Certificate/Credential or License

The following are examples of incentives:

- Gift cards/certificates (restaurants, video/music stores, retail stores, book store)
- Movie passes
- Clothing for interview, work-site, or special event
- Banquets for participants
- Plaques/Certificates
- Class pictures
- School supplies
- Summer work experience for year round participation
- Field Trips
- Cash (in the form of a check made out to the participant)



Service providers must submit a plan for how incentives will be used if they are offered outside of the region wide incentives policy and should consider how the program budget will be impacted. Incentives may be provided to all qualifying youth and/or by random drawing from those that participate in the selected activity. Sign-in sheets should be kept for all activities. Participant case notes should reflect the award of incentives.

## **Region Wide Incentives**

Service providers are encouraged to offer youth the following incentives as funding allows:

- ✓ Maintaining grades at a B or better average each semester: \$25
- ✓ Literacy and/or Numeracy scores increase one Educational Functional Level (EFL) within the designated year: \$25
- ✓ Completion of High School Diploma or Education Equivalency: \$100
- ✓ Completion of training and are awarded a certificate/credential/degree/diploma, etc.: \$100  
Youth that complete training that require state exams, must take and pass the exam prior to receiving the incentive (such as Nurse Aid).
- ✓ Completion of Key Train pre-assessments (for Reading, Math, and Locating Information): \$25
- ✓ Completion of the Career Readiness Certification: \$100

B Average: \$25  
EFL Increase: \$25  
Diploma/GED: \$100  
Credential: \$100  
Key Train Pre-assessments: \$25  
Career Readiness Certification: \$100