

The process flow for combined state and local Rapid Response activities will be conducted as follows:

- Initial contact from the employer, either direct or indirect contact, to either WorkForce West Virginia or the local WDB (first party notified will immediately notify the other party).
- State and local representatives discuss coordination of services for the employer and employees.
- Establish state roles and local roles, to include roles of neighboring WDBs and WDBs located in adjoining states (who will be the lead agency).
- Contact employer for additional information regarding the layoff, plant closure, etc.
- Determine if plant closing, layoff, or downsizing is due to international competition.
- Set up initial meeting date with the employer and union (if applicable).
- Develop appropriate materials and presentation on programs and services.
- Contact the Rapid Response Team members and brief them on upcoming events with employer and employees.
- Rapid Response Team meets with company officials and union officials (if applicable).
- Prepare and distribute initial employee meeting agenda to include discussion about the employee survey.
- Identify employee's skills, wages and needs.
- Present services offered at the local WorkForce West Virginia Career Center (One-Stops)
- Determine the need for an Adjustment Committee (does the company and union want an Adjustment Committee?).
- Conduct Adjustment Committee training.
- Conduct meeting(s) with employees to inform them about available services.
 - ✓ One-Stop partner services.
 - ✓ Market community programs.
 - ✓ Conduct employee needs survey.
 - ✓ Identify Unemployment Insurance requirements.
 - ✓ Inform about job search methods.
 - ✓ Inform about training opportunities.

- ✓ Identify services that maximize reemployment opportunities.
- Analyze other needed services through surveys and distribute results.
- Assist employees find jobs.
- Provide WIOA Career and Training Services.
- Provide WIOA Case Management Services.
- Provide WIOA Supportive Service needs.
- Assist individual obtain unsubsidized self-sustaining employment.
- Provide follow-up activities.

Funding of local Rapid Response activities will come from local Dislocated Worker funds. Once local Dislocated Worker funds are depleted the WDB may request additional Dislocated Worker funds from WorkForce West Virginia.

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

Description and assessments of the type and availability including activities for disabled and non-disabled are administered prior to enrollment and annually to measure progress. The Region VII WDB services out-of-school youth between ages 16-24 and in-school youth between the ages of 14-21.

Activities and services provided are as follows:

- Career training – classroom with instruction, attainment of education credentials.
- Employment training – work experiences, on-the-job training, occupational skills training, and job search.

In addition, the fourteen WIOA Youth Program elements are incorporated as services in program design and provided (when applicable) to youth program participants. These elements include:

- Tutoring, study skills training
- Alternative secondary school services, or dropout recovery services
- Paid and Unpaid work experience
- Occupational skill training

- Education offered concurrently with and in the same context as workforce preparation activities and training
- Leadership development opportunities
- Supportive Services
- Adult Mentoring
- Follow-up services
- Comprehensive guidance and counseling
- Financial Literacy
- Entrepreneurial skills training
- Services that provide labor market and employment information
- Activities that help youth prepare for and transition to post-secondary education and training

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

The Region VII WDB works closely with local community and technical colleges as well as other private institutions to provide training opportunities to meet the demands of employers in the region. There are quarterly training provider meetings at both One-Stop Career Centers in the region to discuss curriculum. Our focus is on programs and certificates identified as in-demand by industry. Our quarterly Implementation Team meetings keep One-Stop partners abreast of all activities in the local area as well as identify areas of need. Sector-Strategy meetings held in conjunction with our CTC partners create an additional platform to not only address areas of need, but prevent duplication of services. In addition to regular WDB meetings, staff also attends various regional partner meetings. Meetings with agencies within the region are used to address areas of need, concern, further strengthen existing partnerships while also preventing duplication of services. At a front-line level, it is not uncommon for One-Stop staff to contact local partners in regards to a “shared” customer in efforts to provide wrap-around services, while eliminating the possibility of duplicating said services. The Region VII WDB is fortunate to have local partners committed to the development of the regional workforce and economy.

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

The Region VII WDB acknowledges that a lack of transportation continues to be a barrier to employment within our local area. While public transit exists, it is not readily available to all of our customers. Reliable public transit in our population centers exists and in many instances provides bus routes to the major area employers as well as our comprehensive One-Stop Centers. However, due to much of the region being of a rural nature, public transit from home-to-work is not always possible, nor financially feasible. In effort to fill this area of need, the Region VII WDB has developed a Supportive Service Policy. The policy allows for WIOA customers to log

time/attendance sheets and be reimbursed at a flat rate per day for the costs of travel, child care, and other related costs to training and searching for work. Please see **Attachment I** which is the Region VII WDB's Supportive Services Policy.

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

The Region VII WDB budget is reviewed and approved by both the Local Board and the Local Elected Officials Board at their respective annual meetings. Any revisions that take place throughout the program year are also subject to approval by both boards. Please see Section 4 – Adult, Youth, and Dislocated Worker Functions, Question 1 and **Attachment G**, the Region VII WDB Priority of Service Policy for additional information.

G. A description of how the Local Board will utilize Local Dislocated Worker Funding.

The Region VII WDB budget is reviewed and approved by both the Local Board and the Local Elected Officials Board at their respective annual meetings. Any revisions that take place throughout the program year are also subject to approval by both boards. The State has identified four “high-growth” industry sectors in the state; advanced manufacturing, healthcare, information technology, and energy. The Region VII WDB is financially committed to supporting all training endeavors that lead to industry recognized credentials in occupations identified as “in-demand” by the U.S. Department of Labor. Please see Section 4 – Adult, Youth, and Dislocated Worker Functions, Question 1 and **Attachment G**, the Region VII WDB Priority of Service Policy for additional information.

H. A description of how the Local Board will define “self-sufficiency” for employed Adult and employed Dislocated Worker participants.

The Region VII Workforce Development Board will utilize 125% of Federal Poverty Guidelines and 70% of the Lower-Living Standard Income Level (LLSIL) when determining income based eligibility for WIOA Adult or WIOA Youth services. A low-income individual is one who qualifies under various criteria, including an individual who received income for a six-month period that does not exceed the 125% of federal poverty level guidelines. The policy covers all needs related payments, supportive service payments, stipends, training funds, or any other monies designated on behalf of eligible low-income WIOA Adult or WIOA Youth customers. The region's designations are accepted by the Department of Labor and WorkForce West Virginia based consistency with the Workforce Innovation and Opportunity Act and WIOA regulations. As policy, the 125% of federal poverty guidelines will be the standard when determining WIOA Adult and WIOA Youth income eligibility in Region VII, except for families of three or more in Berkeley or Jefferson County. In this instance, the 70% of the LLSIL will be used for determining WIOA eligibility.

Please see **Attachment J**, the Region VII WDB's Low-Income Eligibility for WIOA Services Policy for additional information.

I. A description of the Local Board's definition of "unlikely to return to previous industry or occupation" when required for eligibility for Dislocated Worker services.

Unfortunately, coal mining and manufacturing are two examples of declining/changing industries in the national, regional, and local economies. In this instance, a WIOA customer who has demonstrated an active and thorough job search effort may be considered as "unlikely to return to previous industry or occupation." Case management staff will assess customer's transferrable skills to determine if re-employment opportunities may exist outside of their previous industry or occupation. If not, our One-Stop case management team may determine training for an in-demand occupation is necessary for the customer to obtain self-sufficient re-employment. The aforementioned case management process must be fully documented in the Individual Employment Plan (IEP). The Region VII WDB acknowledges that there may be other industries adversely affected by changes in technology and/or various economic conditions. For instance, in West Virginia, the coal industry has been adversely affected by a combination of environmental and economic factors. At this point, it seems unlikely to return as a major economic contributor in the region. However, manufacturing has not ceased, but changed. As our region emerged from the Great Recession, we have found manufacturing has given way to advanced manufacturing. Traditional laborers are now required to possess certifications or at the very least the skill-sets to operate sophisticated machinery. We have also seen the consolidation of departments as well as management functions. This has led to a variety of mid-management, supervisors, and line-workers unable to find re-employment through traditional methods. When this occurs, a need for training may be identified by our case management team. In order for our WIOA customers to be competitive in the job market, our One-Stop staff will exhaust all avenues of re-employment including training for a new career.

J. A description of how the Local Board will interpret and document eligibility criteria for "requires additional assistance to complete an educational program or to secure or hold employment" as set forth in the State's Guidance and WIOA Sections 129(a)(1)(B)(iii)(VII) and (a)(1)(C)(iv)(VII).

Currently, the Region VII WDB has a Youth Who Needs Additional Assistance Policy, **Attachment K**, which defines the criteria a WIOA eligible youth in Region VII must meet in order to qualify for "additional assistance." Under the WIOA law, as defined in section 681.200 (c)(8), either the State or the local level may establish definitions and eligibility documentation requirements for the "requires additional assistance to complete an educational program, or to secure and hold employment." In cases where the State Board establishes State policy on this criterion, the State Board must include the definition in the State Plan. In cases where the State Board does not establish a policy, the Local Board must establish a policy in their local plan if using this criterion. The Workforce Innovation and Opportunity Act of 2014 provides for employment and training programs for Out-of-School Youth ages 16-24 that are not attending school and meet at least one mandated barrier to training or employment. For a youth to qualify for services using the criterion "is an individual who requires additional assistance to complete an education program, or to secure and hold employment, one of the following must be met:

- Youth in a situation of domestic violence
- Youth with a history of substance abuse
- Youth that lacks occupational goals/skills
- Youth that has a poor work/no work history
- Youth that has been actively seeking employment for at least 2 months, but remains unemployed
- Youth that is gang involved or at-risk of gang involvement
- Migrant Youth
- Youth residing in a household where at least one family member living at the same residence has received public assistance in the last six month

The Region VII WDB has an established Supportive Services Policy, **Attachment I**. The Supportive Services Policy is meant to help alleviate the incidental and miscellaneous cost associated with completing training or finding employment. First priority is given to WIOA eligible Adults and then WIOA eligible Dislocated Workers who have exhausted their UI benefits. All supportive service requests are initiated by WIOA Case Managers and are subject to approval by the One-Stop Director and ultimately the regional office. All requests and subsequent payments are sufficiently documented per our regional policy and fully comply with the State's Guidance and WIOA Sections 129(a)(1)(B)(iii)(VII) and (a)(1)(C)(iv)(VII).

K. A description of the documentation required to demonstrate a “need for training.”

Before a “need for training” can be documented by WIOA staff, eligibility must first be determined and verified by our WIOA Career Coaches. Once eligibility criteria have been determined, Region VII Workforce Development Board believes in an individualized approach to case management services. Region VII WDB believes this practice best serves the intent of the Act. Perhaps this is best demonstrated through the formation of the Individual Employment Plan (IEP). The IEP serves as a roadmap for the client on their journey to re-employment and self-sufficiency. Just as each client's individual circumstances are different so is their IEP. Some clients may find through the formation of their IEP that formal training is not what they need. In many instances, identifying transferable skills and On-the-Job Training opportunities may best serve the client's needs. If our WIOA staff in conjunction with the client can demonstrate an IEP that includes training as part of their plan for re-employment and self-sufficiency, the Region VII WDB will provide the funding assistance per our regional Individual Training Account (ITA) Policy. If a WIOA eligible individual has a certification or degree in any recognized demand occupation, staff must document “why” a “need for training” exists. The “need” could be derived from various possibilities, such as: a former truck driver with a DUI, a former health care worker with a drug conviction, a former teacher with sexual offense, or any worker whose skill-sets are determined to be out-dated. The latter can best be

demonstrated in the field of Information Technology where the knowledge and skills obtained through degrees and certifications change quite rapidly. If no apparent hindrance applies to a WIOA eligible individual with advanced training, they must demonstrate a concerted work-search effort. If they are unable to find re-employment within six-months with their existing training/certifications/degree, the Region VII WDB would entertain training said individual for a different regionally recognized demand occupation. It is important to note that Region VII WDB understands the rapid nature in which employer demands change. Therefore, in the best interest of our clients, we maintain the flexibility to serve the training needs of our individual clients and recognize the training demands of employers can change rapidly and without notice. It is important to note the Region VII WDB and our WIOA ITA services are not a vehicle for career change merely for the sake of change, i.e. a teacher that is tired of teaching and decides to become a nurse. The Region VII Workforce Development Board is committed in their role to provide a highly skilled and competitive workforce. Formalized training certifications and degrees are tools utilized by the Region VII WDB to accomplish this goal.

L. A description of how the Local Board will provide the fourteen required program elements for the WIOA Youth program design.

After eligibility determination by the WIOA Youth Case Manager (located at the WorkForce West Virginia Career Center), the WIOA Youth Case Manager will then refer the young person to the Year-round Youth Services Provider. The Youth Services Provider (YSP) will then interview the customer to determine if he or she would benefit from the youth services offered. If the YSP feels that the services offered would benefit the young client, they will register the customer into the MACC computer system. If the services provided are not appropriate for the customer, the YSP will make referrals to other appropriate services in the community. For the Youth accepted into the program, the YSP will then conduct an objective assessment of each youth participant that meets the requirements of WIOA and includes a review of the academic and occupational skill levels, as well as the service needs of each youth;

The Youth Services Provider will develop service strategies for each youth participant that meets the requirements of WIOA including identifying a career goal in consideration of the participant's needs;

The YSP will conduct a pre-test within 60 days of enrollment into the program, using a standardized testing instrument (as defined by the Department of Labor as suitable for Common Measures criteria) to identify participant math and reading levels. Basic skill instruction, if the need is identified (anything below 9th grade level), will be provided to assist the youth in increasing basic skill levels. Increased basic skill levels will be documented comparing the basic skills pre-test score with the results of the required post-test using the same standardized testing instrument used during the pre-test;

Preparation for post-secondary educational opportunities, linkage between academic and occupational learning, preparation for employment, and effective connections to intermediary organizations that include strong links to be job market employers, and regional demand occupations;

The Youth Services Provider will be responsible for arranging and/or providing service for youth based on the results of individualized objective assessments and individual service strategy. If a youth is determined to be in need of any of the fourteen (14) program elements, those elements shall be made available to the individual served. The YSP will document activities, attendance, and progress of individuals participating in each element. This information will be entered into the Mid-Atlantic Career Consortium (MACC) system by the Youth Case Managers as they occur, to be used for reporting and performance purposes. This will be reported to the appropriate WDB staff for monitoring purposes. Case Managers will maintain a hard copy case management log on each client served, which includes linkages, referrals to other services, services provided, and plan for further activity or follow-up;

The Youth Services Provider will identify how services will be offered to youth that were provided WIOA youth services under a prior contract. All services will be recorded in the MACC system, and will be maintained on a daily basis. The YSP will continue offering WIOA services as outlined on the youth Individual Service Strategy (ISS) and provide follow-up services as required by the Act. The YSP will conduct face-to-face contact with all youth receiving WIOA youth services, excluding follow-up services. The YSP will have monthly contact with all WIOA youth participants, except those youth receiving only follow-up services.

The Youth Services Provider will give enrollment priority to those WIOA participants receiving youth services under a prior WDB youth services contract. The YSP will also provide follow-up services to those youths that have exited the WIOA youth services elements but still fall into the “follow-up” window for twelve months.

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

Youth case managers and appropriate WDB staff is committed to providing quality work-based training activities to the youth in the region. The Youth Case Managers will coordinate with the Region VII WDB Business Analyst to link youth to paid work experiences as well as job shadowing of employers in the area. After assessing the youth’s career interests, the case manager will refer to them to an appropriate employer in the area. There is an agreement in place with the youth services provider that 20% of the youth funds for work-based training activities must come from the contract between the Region VII WDB and the youth services provider, United Way of the Eastern Panhandle. Funds spent on work-based training activities will be tracked by the appropriate WDB staff.

N. A description of the Local Board's plan to service 75% or more out-of-school youth and identify specific steps that have been taken to meet this new goal.

Under WIA, Region VII Workforce Development Board had a self-imposed 70% out-of-school to 30% in-school youth provision. So, meeting the WIOA standard of serving 75% out-of-school youth only called for a minor adjustment in the recruitment and subsequent enrollment of eligible WIOA youth. The 75% WIOA mandate to serve Out-of-School Youth will be explicitly stated in the Region VII WDB Youth Service Provider contract/statement of work. See **Attachment CC**, Contract and Memorandum of Understanding between Region VII Workforce Development Board and United Way of the Eastern Panhandle, page 1.

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

The fourteen WIOA Youth Program elements are incorporated as services in program design and provided (when applicable) to youth program participants by the Youth Services provider. These elements include:

- Tutoring, study skills training
- Alternative secondary school services, or dropout recovery services
- Paid and Unpaid work experience
- Occupational skill training
- Education offered concurrently with and in the same context as workforce preparation activities and training
- Leadership development opportunities
- Supportive Services
- Adult Mentoring
- Follow-up services
- Comprehensive guidance and counseling
- Financial Literacy
- Entrepreneurial skills training
- Services that provide labor market and employment information
- Activities that help youth prepare for and transition to post-secondary education and training

For additional information, please refer to **Attachment CC**, Contract and Memorandum of Understanding between Region VII Workforce Development Board and United Way of the Eastern Panhandle.

P. A description of how the Local Board will provide basic and individualized career services to customers. The description should explain how individualized career services will be coordinated across programs/partners in the American Job Centers, including Vocational Rehabilitation, TANF, and Adult Education and Literacy

activities. This description should specify how the Local Area will coordinate with these programs to prevent duplication and improve services to customers.

Job seekers and employers in Region VII will have unlimited access to career services. Career services can be obtained through the WorkForce West Virginia Career Centers and their partners, and access points by use of any computer with Internet access. Career services will be coordinated through the One-Stops and will involve more intensive evaluation, testing, assessment, case management services, and development of the Individual Employment Plan (IEP). Career Coaches/Case Managers will put emphasis on identifying any and all possible barriers to employment and refer the individual to agencies that can assist the individual to overcome known barriers. Career Coaches will utilize to the fullest, services of Adult Education (AE), DHHR's SPOKES Program, Division of Rehabilitation Services, and other services that are known to enhance an individual's employability skills. In no instance, should any individual be referred to a training program or employer unless all barriers preventing success have been overcome at the Case Management level. In the event career services do not result in employment for the individual, additional assessment and case management services will be provided. At this point, the individual may be qualified for either On-The-Job Training or occupational training in a demand occupation specific to the regional labor market. Training under the ITA will be used only after customized training and/or OJT are used or determined not appropriate for the participant. On-the-Job Training will have priority over contracted occupational training. Individuals eligible for the Individual Training Account (ITA) will be provided training by a Training Provider approved by the Board and WorkForce West Virginia. The Training Provider must offer training in a regional demand occupation.

As previously mentioned in Section 4, Question 4, quarterly Implementation Team meetings keep One-Stop partners abreast of all activities in the local area as well as identify areas of need. Sector-Strategy meetings held in conjunction with our CTC partners create an additional platform to not only address areas of need, but prevent duplication of services. In addition to regular WDB meetings, staff also attends various regional partner meetings. Meetings with agencies within the region are used to address areas of need, concern, further strengthen existing partnerships while also preventing duplication of services. At a front-line level, it is not uncommon for One-Stop staff to contact local partners in regards to a "shared" customer in efforts to provide wrap-around services, while eliminating the possibility of duplicating said services. The Region VII WDB is fortunate to have local partners committed to the development of the regional workforce and economy.

Q. Describe the Local Board's follow-up services policy. This should include follow-up requirements, frequency of contact, and required documentation.

Section 3-9: Follow-Up, pages 37-38 of the Region VII Workforce Development Board Manual stipulates that WIOA Career Coaches and Youth Case Managers are required to follow-up with WIOA Adult, Dislocated Worker, and Youth clients once a month via face-to-face interaction,

telephone conversation, or by mail. The method of contact and description of the interaction is required to be inputted into the state database, MACC. Please see **Attachment S** which will be the Region VII Workforce Development Board Manual.

Section 5: Wagner-Peyser Functions

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

The Wagner-Peyser entity has representation on our Local Board, with the Manager of the South Branch location serving as a board member. Strengthening linkages between the One-Stop delivery system and unemployment insurance WorkForce West Virginia maximizes all available resources and tools to ensure that all job seekers will have full access to jobs and filing of UI claims. Wagner-Peyser staffs, along with WIOA staff, provide a variety of high quality career services in a customer-centered approach environment to include, but not limited to: job search navigation, job readiness assessment, vocational counseling, labor market information, and workforce development duties associated with the employability development of its customers. Services are delivered in one of three methods including (1) self-service, (2) facilitated self-help services, and (3) staff assisted service delivery approaches. Depending on the needs of the labor market, other services, such as job seeker assessment of skill levels, abilities, and aptitudes, career guidance, job search workshops, and referral to training may be available when deemed appropriate. Workforce West Virginia and Region VII Workforce Development Board are co-located in both the Martinsburg and South Branch One-Stop Career Centers.

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

At the South Branch One-Stop Career Center, WIOA staff participates in the weekly UI orientation sessions held by Wagner-Peyser staff. At the Martinsburg One-Stop Career Center, Wagner-Peyser staff refers interested parties to weekly WIOA orientation sessions. Also, at any point, referrals can be easily made by Wagner-Peyser staff to WIOA staff based on the co-location of the respective offices. Staff from each organization routinely works together on such projects as jobs fairs and rapid response activities as well as engage in a number of meetings and/or trainings together. This level of joint cooperation facilitates familiarization of services and ultimately provides better customer service. The Region VII WDB acknowledges that while some cross-training amongst Wagner-Peyser and WIOA staff exists, further efforts in this area are needed and will undoubtedly

be fostered in the future through the WorkForce West Virginia office.

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

Services, activities, and programs delivered the One-Stop Career Centers will be provided in accordance with the ideas and requirements of WIOA and guidance provided by the U.S. Department of Labor. The Region VII WDB will provide intensive case management to all migrant and seasonal farm workers as well as place them into a wide array of jobs depending on their goals and training. The WIOA Career Coaches will provide customers with labor market information and choices related to education and training options. Also, the WDB will refer these workers to Adult Education and English as a Second Language programs based on needs.

Section 6: Title II – Adult Education and Family Literacy Functions

A. A description of how the Local Board will coordinate workforce development activities in the Local Area integrating the provision of adult education and literacy activities under Title II of WIOA, but not limited to, the implementation of the career pathways model.

Adult Education (AE) is an active partner in the local and regional workforce system. Eastern Panhandle Instruction Cooperative (EPIC) Program Director, John Holmes, is a member of the Region VII Workforce Development Board. AE co-enrolls and cross refers students to employment service programs, provides TASC test prep and testing services, and provides integrated instruction for career pathway programs. AE has programming and partnerships that create multiples points of entry for students along several career pathways and is committed to working closely with the local board to embed this work further across the local area.

B. A description of how the Local Board will coordinate efforts with Title II providers to align basic skills and English language assessments. The description should include:

- An outline of the agreed upon steps that will be taken to align basic education skills and English language assessments within the local area, including, but not limited to, any Memoranda of Understanding entered into by the workforce development and adult learning partners;
- An identification of how assessment scores will be shared among WIOA Title I areas and Title II providers {Consideration must be given to the Federal Education Rights and Privacy Act (FERPA)};
- An identification of who will conduct which of the approved assessments (including for

Trade Participants) and when such assessments will be conducted, consistent with this policy.

- An outline of how the local area will coordinate testing between workforce development and adult education providers.
- An outline of how the local area will ensure that test administrators are to be trained in accordance with this policy and applicable testing guidelines as set forth by the applicable test publisher.

WIOA presents an extraordinary opportunity to improve the quality of life for individuals with low skills. Literacy and numeracy are fundamental skills necessary for workforce success, as well as for personal and social well-being. Services provided under WIOA are intended to lead to further education, training opportunities, and work, and are to be based on best practices derived from the most rigorous research available. The diversity of individuals who possess low skills requires a broad approach to skills development.

As one of six core programs under WIOA, Adult Education (AE) programs plays an integral role in the workforce development system by providing access to educational services for adult learners through the one-stop delivery system. AE seeks to increase opportunity in the educational and workforce development of adults as workers, parents, and citizens. While playing a critical role in adult attainment of a secondary school diploma, the program also aims to assist in the transition to postsecondary education and training through the use of career pathways.

The local one-stop delivery system in conjunction with local AE programs will provide the following critical services and activities to support adult learners with the goal of improving access to education and training opportunities, as well as to employment:

- Assist adults to become literate and obtain the knowledge and skills for employment and economic self-sufficiency;
- Support the educational and skill achievement of parents and family members to participate in the educational development of their children and improve economic opportunities for families;
- Assist immigrants and English learners in improving their English and math proficiency and understanding of the rights and responsibilities of citizenship; and
- Assist incarcerated individuals in strengthening their knowledge and skills to promote successful re-entry into society.

Assist adults to become literate and obtain knowledge and skills for employment and economic self-sufficiency. Workers and job seekers have access to basic skills instruction relevant to employment through the one-stop delivery system. Education is provided in the context of

industry-specific needs that involve employers and is integrated with occupational skills training to achieve the best outcomes for participants. Programs use career pathways, integrated education and training, and workforce preparation activities as hallmarks of excellent work-relevant instruction.

Support the educational and skill achievement of parents and family members to participate in the educational development of their children and improve economic opportunities for families. Family literacy programs provide parents and family members with foundational skills that boost their knowledge and confidence to support the educational development of, and to become educational advocates for their children. Parents and family members are able to improve their skills to achieve readiness for postsecondary education or training, job advancement, and economic self-sufficiency. Programs are designed to make sustainable improvements in the economic prospects for a family and to better enable the family to support their children's learning needs.

Assist immigrants and English learners in improving their English and math proficiency and understanding of the rights and responsibilities of citizenship. English learners have access to services to help them achieve competence in reading, writing, speaking, and understanding English. These competencies allow them to obtain secondary school credentials and succeed in further education and training. Immigrants acquire an understanding of what it means to be a citizen and to participate in civic responsibilities. Programs are designed to provide high-quality math instruction, evidence-based English language instruction and civics education that is responsive to, and respectful of, the diversity of immigrants and English learners.

Assist incarcerated individuals in strengthening their knowledge and skills to promote successful re-entry into society. Individuals who are incarcerated have access to educational services that prepare them for employment, economic self-sufficiency, family roles, and responsible citizenship upon their release. Incarcerated individuals can access adult education and literacy activities that support post-release transition to higher levels of education and training, as well as meaningful employment. Programs are designed to support incarcerated and formerly incarcerated individuals' access to life-expanding career pathways opportunities that include approaches such as dual enrollment, peer tutoring, and transitions to re-entry services designed to facilitate post-release success and reduce recidivism.

Adult education leaders should take immediate action to move forward in achieving this vision for excellence in service to adults who can benefit from improving their literacy and English proficiency skills.

Realizing the vision requires acting upon the following principles:

- I. **Leaders develop a vision for how adult education aligns with core programs and one-stop partners.** The local area has established strong partnerships with core programs and other necessary community partners to successfully serve adult learners. Region VII WDB embraces partnerships of the core programs to develop a unified strategic vision and goals for preparing an educated and skilled workforce through our one-stop delivery system. Adult Education, as a core program, is a key component in the implementation of the Plan, including the development of career pathways to provide access to high-demand, regionally significant employment and training services for individuals in Adult Education programs.
- II. **Move toward aligning adult education content standards with the state's K-12 standards.** Local adult education programs identify curriculum frameworks for the standards that take into account the academic requirements for non-remedial credit courses in postsecondary institutions. Adult education leaders and practitioners consider the content of occupational and industry standards that are widely used in the state and ensure that teachers are trained and supported to implement standards-based education. State-adopted academic content standards provide a focus for coherent improvement in all components affecting teaching and learning, including curriculum, instruction, professional development, program leadership, student assessment, and program monitoring and accountability.
- III. **Commit to improving teaching and learning in every local adult education program.** Support adult educators in learning and applying practices that are based on the most rigorous or scientifically valid research available. Teacher training promotes an understanding of adults as learners and focuses on the teaching of reading, writing, mathematics, and English language acquisition to adults. The Region VII WDB coordinates efforts with Adult Education to align basic skills and English language assessments. The Local Board mandates test administrators are to be trained in accordance with local, state, and federal standards. Professional learning opportunities are available for teachers of all experience levels. Effective teachers are recognized and used to train and mentor novice instructors.
- IV. **Adult educators leverage technology to improve teaching and learning.** Many local and regional jobs require digital literacy. The Region VII WDB encourages and supports the integration of digital literacy skills into all adult education and literacy activities. Further, recognizing the work and family demands of adult learners, Region VII WDB supports Adult Education's effort to expand high-quality distance education offerings. Adult educators enrich teaching and learning in traditional classroom, distance education, and hybrid learning environments by identifying, using or adapting, and assessing with appropriate and high-quality open education resources. Professional development explicitly addresses the teaching and assessment of digital literacy skills integrated appropriately into

instruction in all content domains. Region VII is committed to working with local adult education programs to ensure that local program staff can assist all learners in maximizing access to technology and the Internet.

- V. **Adult educators work to create stronger linkages with employers in partnership with other core programs.** Region VII WDB encourages and supports ongoing engagement with employers and workforce development system partners in the design, delivery, and evaluation of career pathways educational programs, integrated education and training, and workforce preparation activities that are responsive to regional and local labor market demands. Career pathways, integrated education and training, and workforce preparation activities reflect the skill needs of high-demand jobs within the local and regional economy. Employers work in partnership with other core programs and eligible providers to deliver adult education and literacy activities. Employers not only serve in advisory capacities but also provide externships (teacher learning experiences) and make commitments to hiring program graduates. Employers clearly and consistently articulate the value-added of adult education services.
- VI. **Identify models and promising practices and a process to disseminate them for wider use among local providers.** Region VII WDB supports and promotes evidence-based instruction to assist youth and adults with low literacy skills in participating more fully in society and successfully transitioning to further education and training. Teaching and learning methods include, but are not limited to, instruction incorporating the essential components of reading instruction and instruction that addresses the needs of adult learners, including those with disabilities. The Region VII WDB in conjunction with state and federal agencies may provide technical assistance to eligible providers through development and dissemination of high-quality, evidence-based professional development, assessments, and instructional training for use in the classroom; use of technology to improve system efficiencies and performance, including advancements in digital literacy skills; and the monitoring and evaluation of programs and activities.
- VII. **Evaluate programs and activities to ensure continuous improvement and expand the available evidence base.** States conduct ongoing evaluations of the core programs using the more rigorous analytical and statistical methods that are reasonably feasible to promote efficiency and effectiveness of the workforce development system. The results are used to achieve a high-performing system that reflects optimal outcomes for its participants. Evaluations fully engage partner programs; leverage federal, state, and local resources; and include customer feedback. Evaluations are transparent, and results are accessible to the public.

VIII. **Work to increase accountability of the workforce development system.** Region VII WDB will use the performance indicators established in WIOA to assess the effectiveness of our workforce system. Integrated data systems promote the availability of high-quality data on participant outcomes and support research and evaluation activities. Data about specific subpopulations of participants, such as individuals with barriers to employment, are disaggregated to determine the extent to which the workforce development system is effectively providing opportunity to vulnerable populations,

C. A description of how the Local Board will ensure that the individual appointed to represent Title II services on the Board will coordinate with all Title II Grant Administrators in the Local Area in a uniform, regular and consistent manner.

See response to Section 6, Question 1. Also, see **Attachment T**, MOU between Adult Education and the Region VII Workforce Development Board.

D. A description of how adult education services will be provided in the American Job Center system within the Local Area.

The Region VII Workforce Development Board one-stop delivery system is committed to a seamless provision of adult education services to clients in the local area. Referrals of individuals to adult education sites occur on a daily basis as does referrals from adult education sites to the One-Stop Career Centers. Also, when needed, the Region VII WDB and the comprehensive One-Stop Career Centers may provide space when the need for adult education services exceeds their current classroom setting. WIOA staff is well versed in the TABE assessment and all WIOA staff is certified to administer said assessment. The One-Stop Career Centers will accept TABE assessments from our adult education counterparts; likewise, AE may utilize TABE assessments administered by One-Stop staff. Adult education is a core partner with the Region VII WDB and our One-Stop Career Centers. Our mutual clients derive value-added services, such as, comprehensive case management, career exploration, basic literacy/numeracy skills enhancements, English as a Second Language (ESL), career pathways, On-the-Job Training, and advanced post-secondary training. In combination, these resources with the appropriate staff guidance create a roadmap to self-sufficiency and career success.

Section 7: Vocational Rehabilitation Functions

A. A description of the cooperative agreements (as defined in section 107(d)(11) between the Local Board or other entities described in section 101(a)(11)(B) of the Rehabilitation Act of 1973 (29 U.S.C. 721(a)(11)(B)) and the local office of a designated State agency or designated State unit administering programs carried out under title I

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

Division of Rehabilitation Services (DRS) collaborates to enhance services to individuals with disabilities, individuals with barriers to employment, and individuals living in poverty. Each One-Stop Career Center provides an orientation to services available to assist job-seekers in making an informed decision on choice of service provider. Direct service staff participates in cross-training to ensure they understand the services offered by the various partners, and the eligibility criteria for each program.

DRS staff is available for consultation without the need for the person to apply for services. Typical topics include how and when to disclose a disability, effective use of assistive technology, and benefits planning. The Region VII WDB consults with DRS and other partners as initiatives such as incumbent worker training programs, customized training programs, career pathways initiatives, youth services, and other business services are developed. Also, DRS participates in local job fairs and other community events such as Rapid Responses. Additional information describing the “cooperative agreement” between the Region VII WDB and DRS can be found in our joint MOU, **Attachment T**. This MOU is reviewed annually and is in full compliance with WIOA Section 107(d) (11) as well as the Rehabilitation Act of 1973 (29 U.S.C. 721(a) (11) (B)).

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

In Chapter 1, Sections 1 and 2 of the Region VII Workforce Development Board Manual, under the Workforce Innovation and Opportunity Act (WIOA), the categories of core and intensive services under the Workforce Investment Act (WIA) have been consolidated into a single category of career services. Upon entering the One-Stop, an individual is given a Partner Agency Referral Form in order to determine their primary needs for services. The intake worker/case manager interviewing the participant must assist the customer in completing the Partner Agency Referral Form. All responses to questions on the referral form must be answered honestly by the customer. The referral form must reflect information as of the date the form is completed and must be signed and dated by the both the customer and case manager. The WIOA addresses an important distinction between registration and participation – two separate actions in the process. Individuals who are primarily seeking information are not treated as participants and their self-service or information search

requires no registration. When an individual seeks more than minimal assistance from staff in taking the next step towards self-sufficient employment, the person must be registered and eligibility must be determined. Registration is defined as the point at which information that is used in performance begins to be collected. Registration is the process for collecting information to support a determination of eligibility. This information may be collected through methods that include electronic data transfer, personal interview, or an individual's application. Participation is the point at which the individual has been determined eligible for program services and has received or is receiving a WIOA service, such as career services other than self-service or informational service and is the point at which an individual is to be included in performance calculations for the primary indicators of performance. Participation occurs after the registration process of collecting information to support an eligibility determination and begins when the individual receives a staff-assisted WIOA service, which does not include self-service or informational activities.

When accommodations are necessary for clients entering the One-Stop, our staff will make every effort to provide the additional help needed. However, if individuals choose not to disclose a disability to One-Stop staff that remains the right and choice of the individual. More detailed information pertaining to delivery of services through the American Job Centers in Region VII can be found in our partner MOU with DRS, **Attachment T**.

Section 8: Jobs for Veterans State Grant Functions

A. A description of how the Local Board will provide priority of service to veterans and their eligible spouses.

Veterans of Region VII are a priority for service and are being served through state and local veterans programs, including the Disabled Veterans Outreach Program (DVOP) and the Way Station, operating out of Frederick, MD. The Veterans Administration (VA) in Martinsburg, West Virginia provides a myriad of services to veterans and their spouses. This resource allows us to significantly impact and better the lives of our veteran clients. The VA has employment, housing, and medical programs as well as other services such as counseling that significantly impact our veterans' lives for the better. Walk in participants who are veterans are served at each One Stop location under the Region VII Priority of Service Policy, **Attachment G**. The Disabled Veterans Outreach Program Specialist has an office in the Martinsburg and South Branch One Stops and serves the entire eight-county region.

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

There is currently no Local Veterans Employment Representative (LVER) in Region VII. However, WorkForce West Virginia Wagner-Peyser staff is an integral part of the One-Stop Career Center

Business Service Team and Implementation Team. As mentioned in various areas of this document, members of the Business Service Team and Implementation Team are critical to the front-line services and referrals provided by our Career Centers. This input allows seamless and efficient services to be provided to all individuals including veterans. The Business Services Team provides employers with information on the benefits of hiring veterans.

Section 9: Fiscal, Performance, and Other Functions

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

The Region VII Local Elected Officials and Workforce Development Board issued a Request for Proposal (RFP) for fiscal and administrative agent in January 2014 and more recently January 2017. The Region VII Workforce Development Board and the Local Elected officials unanimously selected Eastern WV Community Action Agency as the WDB fiscal/administrative agent. **Attachment E** is an organizational chart for the WDB. **Attachment C** is the Statement of Work between the Region VII WDB and Eastern West Virginia Community Action Agency.

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

The One-Stop Operator Contract describes the funding level of \$600,000.00 for the career centers, see **Attachment U**. If funding levels change, the One-Stop Director must submit a revised one-stop budget for review and approval by the One-Stop Management Consortium. Once approved, the budget will be reviewed by Executive Committee, the Region VII WDB, and ultimately, the Local Elected Officials of Region VII. The Region VII WDB is confident that current One-Stop Career Center services can continue to be provided for the aforementioned amount. Fortunately, the Region VII WDB has successfully obtained grant funding beyond WIOA annual allocations. The “braiding” of additional monies granted to the Region VII WDB successfully leverages additional granted resources. Also, it insulates the Region VII WDB and our One-Stop Career Centers from minor fluctuations in WIOA allocations. However, significant reductions in annual WIOA allocations would undoubtedly have an impact in our ability to continue to provide the seamless and efficient client services that we are now able to offer.

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

The Region VII Workforce Development Board has a competitive process that follows rules safeguarding fair and objective decision-making when awarding sub-grants and contracts. These rules must comply with appropriate federal, state, and local requirements. The Region VII WDB

complies with 2 CFR Part 200. In January of 2017, WorkForce West Virginia adopted policy 04-17 regarding competitive bid processes. Although, the Region VII WDB has utilized the practices outlined in policy 04-17 for many years, the Board adopted its own policy based largely on the State policy 04-17. See **Attachment HH**, Procurement and Selection of Request-for-Proposals.

In summary, the process is as follows: to the extent possible, services providers for Region VII are selected through a competitive procurement process in accordance with 2 CFR Part 200. Noncompetitive sole source and emergency procurements may be authorized in accordance with 2 CFR 200. For each competitive procurement, the method used (Request for Proposals) is maintained on file. The rationale for all non-competitive procurements is documented according to applicable regulations, cost thresholds, type of service being procured and/or emergency procurement situations.

The evaluation criteria are kept on file for each procurement effort, including the individual evaluation forms completed for each proposal submitted. In addition, copies of correspondence sent to service providers in regards to the procurement are kept as documentation of the Region VII WDB's actions concerning the selection or non-selection of providers. The cost/price analysis and proposed cost of service as the basis for negotiation and final price for the proposed service of the contract price. Any miscellaneous correspondence regarding the proposed costs will be maintained in the appropriate file.

The primary consideration in the selection of service providers is the effectiveness of the agency or organization in delivering comparable or related services. This consideration is based on the following criteria: merits and quality of the technical proposal; demonstrated effectiveness and performance; ability to meet performance standards within reasonable cost parameters; and fiscal accountability and management capabilities. Contract awards are made to the most responsive respondents; those with proposals that are most advantageous to the Region VII WDB after considering price, technical factors, and other applicable criteria.

The Region VII WDB conducts a comprehensive review of all the responses to each solicitation. Responses are evaluated first to ensure all information required is complete and the responses satisfactorily address each and all requirements. Responses that are incomplete or do not satisfactorily address each and every requirement may be disqualified. The evaluation process is designed to assess the respondent's ability to meet the Region VII WDB's requirements and to identify those respondents most likely to satisfy them.

The evaluation process is conducted in a thorough and impartial manner at a publicly noticed selection Region VII WDB Executive Committee meeting. All respondents to a particular solicitation are encouraged to attend a Bidder's Conference held before the meeting. While price is an important factor in selecting a respondent for an award, other factors in the competitive process may be considered and may take precedence over price. Those factors include, but are not limited to: quality of service offered, operating characteristics, technical innovations, administrative capability, previous experience in providing the same or similar services and the ability to achieve the deliverables as specified in the solicitation.

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

PY 20 – PY 21 Performance

WIOA Performance Measures	West Virginia	
	Final Negotiated Goals	
	PY 20	PY 21
WIOA Adults		
Employment (Second Quarter after Exit)	69.3%	69.3%
Employment (Fourth Quarter after Exit)	69.6%	69.6%
Median Earnings	\$ 6,251.00	\$ 6,251.00
Credential Attainment Rate	78.0%	78.0%
Measurable Skill Gains	28.0%	33.0%
WIOA Dislocated Workers		
Employment (Second Quarter after Exit)	81.2%	81.2%
Employment (Fourth Quarter after Exit)	83.2%	83.2%
Median Earnings	\$ 9,719.00	\$ 9,719.00
Credential Attainment Rate	83.0%	83.0%
Measurable Skill Gains	27.5%	35.0%
WIOA Youth		
Employment (Second Quarter after Exit)	63.3%	63.3%
Employment (Fourth Quarter after Exit)	69.7%	69.7%
Median Earnings	\$ 3,182.00	\$ 3,182.00
Credential Attainment Rate	73.3%	73.3%
Measurable Skill Gains	34.4%	34.4%
Labor Exchange (LEX)*		
Employment (Second Quarter after Exit)	61.0%	61.0%

Employment (Fourth Quarter after Exit)	62.5%	64.0%
Median Earnings	\$ 5,093.00	\$ 5,093.00
Effectiveness in Serving Employers		

E. A description of the actions the Local Board will take toward becoming or remaining a high-performing board. This should include a description of the process used by the Local Board to review and evaluate performance of the local American Job Center(s) and the One-Stop Operator.

The Region VII Workforce Development takes many steps to remain as a high-performing board. Region VII WDB staff reviews the annual performance report as well as quarterly MACC performance reports to locate the areas of performance that need to be improved and/or maintained to exceed the negotiated levels of performance. The Region VII WDB and our fiscal agent, Eastern West Virginia Community Action Agency are audited by an independent auditor as well as WorkForce West Virginia's Management Analysis Division on an annual basis to ensure compliance with all WIOA programmatic and fiscal requirements. Region VII WDB monitors training providers, One-Stop Careers Centers, and its sub-recipient, United Way of the Eastern Panhandle, on a bi-annual basis. These monitorings are to ensure that all WIOA fiscal and programmatic requirements are being met. The Region VII WDB also holds various meetings such as Business Services/Implementation Team, Sector Strategy, and Training Provider meetings to discuss the needs of the various organizations and businesses in the region. Staff participates in Economic Development, SHRM, and Chamber of Commerce meetings throughout the region. Finally, the Region VII WDB holds its staff to high standard and expects staff to participate in various professional development activities. Finally, staff is given annual performance evaluations by their direct supervisors to determine areas of improvement or note areas of success. The Region VII WDB remains committed to an active process of organizational self-improvement. The items listed above are the current tools utilized to achieve a "high-performing Board."

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

The Workforce Innovation and Opportunity Act of 2014, Sections 122 and 134(d)(4)(g)(1) and 20 CFR 680.300-680.340 provides for the establishment of an Individual Training Account (ITA) on behalf of an eligible participant to finance approved Training services. The Act establishes the ITA as one of the primary methods for WIOA-eligible participants to access needed training services. The local Workforce Development Board will identify and approve regionally-eligible training providers and programs who have submitted an initial or renewal application via the Mid-Atlantic Career Consortium (MACC) computer system and been granted State approval. The Region VII WDB will distribute information concerning approved training providers and programs to the WIOA Career Coaches at both One-Stops on a quarterly basis. Eligible participants will have full access to this information and will select a training program and provider in a manner consistent with the principle of informed customer choice. The Region VII WDB has authorized a maximum of \$6,000.00 for a period of training up to twelve months in duration. Please see **Attachment L**, the

Region VII Workforce Development Board Individual Training Account (ITA) Policy for additional information.

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

In accordance with WIOA Section 134(c)(3)(G), contracts for training services (such as customized training, work experience, or On-the-Job-Training programs) may be used lieu of or in conjunction with Individual Training Accounts. The client with the assistance of the WIOA Career Coach will determine the best route to self-sufficiency/re-employment and document this in the Individualized Employment Plan (IEP). WIOA customers engage in an active case management process that is customized to meet their unique needs and life situations. Documenting transferable skills and career interests are just as important as assessing basic skills or other potential barriers to employment; such as, transportation needs, child care, housing, etc. WIOA customers are provided with a litany of resources documented in the IEP that serve as their road map to success. Clients are provided with a Training Provider list which includes all approved regional demand-occupation trainings with regional providers in the local area. This list is updated several times a year, but no less than quarterly. Clients are also provided with a Training Provider Report Card. This tool allows WIOA customers to view the performance of approved training programs within our region, based on the self-reported performance metrics input into the MACC system. This allows prospective ITA clients to view critical performance information such as program completion and placement in employment. If our WIOA customer is more interested in returning to the workforce immediately an OJT program may be their best avenue to re-employment. Our WIOA Career Coaches are equipped with weekly reports indicating active regional employers engaged in an OJT contract with the Region VII WDB. On-the-Job-Training programs have been proven to have a higher rate of placement and retention than traditional ITAs. Therefore, the Region VII WDB remains committed to grow our OJT program throughout the local area. Again, in accordance with WIOA Section 134(c)(3)(G), these training services can be used separately or in conjunction as documented in the customer's IEP.

H. A description of the process used by the Local Board, consistent with subsection (d), to provide an opportunity for public comment, including comment by representatives of businesses and comment by representatives of labor organizations, and input into the development of the Local Plan, prior to submission of the plan.

In accordance with the Workforce Innovation and Opportunity Act, Section 108(d), the Region VII Workforce Development Board shall make copies of the proposed local plan available to the public through electronic means, the Region VII WDB website: www.wvregion7workforce.org, 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 comments that represent disagreement with the plan. The Region VII WDB local plan was put out for public comment on

April 29, 2022 and the comment period ended on May 29, 2022.

The local area plan was developed through a series of interactions with core partners and other relevant partner. Industry-standard data sources and practices were used to analyze the current and also projected regional characteristics and trends. The draft plan was distributed to EWVCAA's office and both comprehensive One-Stop Career Centers for review. The plan was also uploaded to the Region VII WDB's website and notification via the website was distributed to all potentially interested parties including local businesses, labor organizations, educational systems, et al.

No comments were received during the public comment period.

I. A description of how the American Job Centers are utilizing the MACC as the integrated, technology-enabled intake and case management information systems for programs carried out under WIOA and programs carried out by American Job Center partners.

Many residents lack the resources to bring the Internet into their homes and rely on the technology available through the workforce system. Computers are provided for residents at One-Stop Career Center locations to access all workforce systems as well as general Internet research. Select trainings and workshops are available online; however, the in-home Internet access in certain areas may not be sufficient to allow for acceptable access.

The Region VII Workforce Development Board will continue to utilize the Mid-Atlantic Career Consortium (MACC) statewide brand for workforce services in order to promote uniformity and increase access to services. Currently, the Region VII WDB and WorkForce West Virginia, in conjunction, use the MACC as the integrated, technology-enabled database system that delivers seamless services as well as case management information.

J. A description of the Local Board's procedures for conducting oversight and monitoring of its WIOA activities and those of its sub-grantee and contractors. The monitoring plan shall address the monitoring scope and frequency and shall include the following:

- **The roles and responsibility of staff in facilitating this procedure**
- **A requirement that all sub-grantee agreements and contracts be monitored at least annually**
- **Procedures for determining that expenditures have been made against the cost categories and within the cost limitations specified in the Act and WIOA regulations**
 - ✓ *The staff of the Region VII Workforce Development Board (WDB), as the appropriate administrative entity for the WDB and Local Elected Officials, will conduct comprehensive on-site reviews of all WIOA-funded sub-recipients no less than twice annually during each program year. Visits in local areas may include, but are not limited to, on-site reviews of training providers, comprehensive One-Stop Career Centers, and satellite centers, sub-recipients of*

WDB funds, and other locations or entities as deemed necessary and appropriate by the WDB. Resolution of any compliance issues shall be in accordance with the provision of the Act, its regulations, and other applicable local and state laws or regulations.

- ✓ *Additional reviews will be conducted by the WDB as deemed necessary and appropriate. These additional reviews may include, but are not limited to, additional comprehensive on-site reviews, special on-site reviews to address specific issues or concerns, and paperwork reviews (“desk audits”) of appropriate reports, documents, or other written or recorded materials.*
- ✓ *For purpose of conducting its comprehensive on-site reviews, the WDB will utilize the attached monitoring tools (included in **Attachment M**). The attached instruments may be modified as needed by the WDB at any time, and may be used in whole or in part for the purpose of monitoring any WDB sub-recipient (including training providers). WIOA-funded agencies are encouraged to utilize the tools contained herein to conduct self-analysis.*
- **Procedures for determining compliance with other provisions of the Act and regulations and other applicable laws and regulations, including the method of monitoring to be used for sub-grantees and contractors**
 - ✓ *The Region VII WDB administrative and fiscal agent shall be monitored annually by an independent auditor.*
 - ✓ *The Region VII WDB is monitored annually by WorkForce West Virginia.*
- **Provisions for the recording of findings made by the recipients’ monitor(s), the forwarding of such findings to the sub-grantee or contractor for response and the recording of all corrective actions**
- **Provisions of technical assistance as necessary and appropriate**
- **Specific local policies developed by the Local Board for oversight of the American Job Center system, youth activities, and employment and training activities under Title I of WIOA**
 - ✓ *The Region VII Workforce Development Board Monitoring Policy encompasses monitoring and oversight for the American Job Center system, youth activities, and employment and training activities under Title I of WIOA.*
 - ✓ *The Region VII Workforce Development Board Monitoring Policy is established from guidance contained in WIOA Section 183. The policy requires monitoring and oversight of our own activities and those activities of our sub-recipients.*
 - ✓ *Sub-recipients include but are not limited to; Youth activities and Employment and Training activities.*

The Region VII Workforce Development Board has a comprehensive Monitoring Policy. The policy is established from guidance contained in WIOA Section 183. The Region VII WDB policy explicitly answers all of the aforementioned questions. Please see **Attachment M**, the Region VII WDB Monitoring Policy.

K. A description of the Local Board’s policy and procedures regarding the handling of personally identifiable and confidential information.

Embedded within numerous Region VII WDB policies are the procedures utilized by staff to ensure the confidentiality of personally identifiable information. These steps include but are not limited to: password protected computers, each staff member has their own MACC password that is changed every thirty (30) days, files kept in locked filing cabinets in a locked room, staff is to keep personal information off of their desktops when not at their desks, only pertinent staff will have access to client's personally identifiable information and excess copies of such information are to be shredded by staff. The Region VII WDB EO Officer, Ms. Stacy Swick, conducts periodic staff development for regional WDB as well as WIOA One-Stop Career Center staff. The Region VII Workforce Development Board remains committed to the strict adherence of all state and federal guidelines, 29 CFR 37.37, in regards to client confidentiality and the appropriate handling of their personally identifiable information.

L. A description of the Local Boards procedures for handling grievances and complaints from participants and other interested parties affected by the local American Job Center system, including partners and services providers. Provide a separate description for the:

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

The above questions are answered in the attached Region VII Workforce Development Board Grievance Policy and the Equal Opportunity Discrimination Complaint Policy and Procedures. Please see **Attachments N and O**.

From the Region VII WorkForce Development Grievance Policy, it reads: "This document establishes the policy of West Virginia on the development, maintenance and implementation of programmatic grievance and complaint procedures. This policy and related procedures covers complaints alleging noncriminal violations of the requirements of Workforce Innovation and Opportunity Act (WIOA) in the operation of local WIOA programs and activities, and transmits policy governing WIOA Title I related grievance and complaint procedures at the local and State level."

“Title 20 Code of Federal Regulations (CFR) Subpart F Section 683.600 requires that Local Workforce Development Boards (LWDB) and sub-recipients of WIOA Title I grant funds comply with the grievance and complaint provisions of the WIOA. This policy applies to programmatic grievances and complaints pursuant to WIOA Section 181(c) and does not address the procedures for processing complaints alleging discrimination under WIOA Section 188 and/or Title 29 Code of Federal Regulations (CFR) Part 37. Information and complaints involving allegations of fraud, abuse, or other criminal activity must be reported directly to U.S. Department of Labor’s (DOL) Office of Inspector General.”

M. A description of the Local Board’s policy and procedures with regard to aid, benefits, services, training, and employment; include a statement of assurance that you will provide reasonable accommodation to qualified individuals with disabilities unless providing the accommodation would cause undue hardship.

The overall mission of the Region VII Workforce Development Board is to provide a framework in which the workforce of West Virginia can attain necessary skills required for the 21st century. This effort should serve both individual and business/industry needs within Region VII.

The primary objectives of the Region VII Workforce Development Board are to utilize a system of One-Stop Career Centers and integrate all elements of the public sector that contribute to this mission. This action will be delivered through a coordinated system of case management, management information systems, and Business Services teams. Deliverables will be directly linked to skills training in demand occupations. These actions include mentoring, work readiness, and job development/placement.

This integrated system will be developed by the public and private sector. The individual job seekers will serve as the supply side for employers. Employment opportunities are created from the current demands of business and industry. Technology and innovation will serve as the catalyst that drives employers’ needs for a skilled workforce. The system will produce the demographics of skill needs, skill sets, and skills training essential to employment needs. The aforementioned information will be made available to job seekers, businesses, training providers, and partner agencies. One-Stop customers enter with a goal of procuring employment or improving their work skills. Some are in need of establishing an assessment of current capabilities as well as potential skill sets. The One-Stops will provide case managers who will, by using services available throughout the integrated system, direct appropriate individuals to demand industries and occupations. Customers will be referred to the appropriate agency or organization and will find success through credentialing followed by job placement with a self-sufficient wage and benefits.

By utilizing the most appropriate career path, time and resources will be saved for the individual job seekers and the system. Skilled workers will be supplied for emerging demand occupations in business and industry. Employers will reduce initial training costs since initial hires will reach full performance at a faster rate. Incumbent workers will also keep up with technology advances, allowing them to keep their present job or advance in the workplace, thus cutting turnover costs,

and as current workers advance, more entry level positions will become available. In addition, information will be accessible to link students with internships, Earn and Learn programs, and other subsidized employment opportunities. This effort will assist in training our next generation(s). Please see the Region VII WDB website: <http://www.wvregion7workforce.org>, our Facebook page at https://www.facebook.com/search/265515320133603/local_search?surface=tyah, and the Region VII WDB Twitter account at <https://twitter.com/RegionVIIWDB>. Details of the Region VII Workforce Development Board's strategies and policies for aid, benefits, services, training, and employment to our clients can be found in the following attachments: ITA Policy, **Attachment L**, OJT Policy, **Attachment P**, Supportive Services Policy, **Attachment I**, Transitional Jobs Policy, **Attachment R**, Youth Services Policy, **Attachment Q**, and Incumbent Worker Policy, **Attachment H**.

The Region VII Workforce Development Board is an equal opportunity program/employer. Auxiliary aids and services are available upon request to individuals with disabilities. The Region VII WDB staff and our partners attend regular trainings on how to better serve individuals with disabilities. Several assistive devices exist within the One-Stop. The devices assist staff in meeting our customers' needs. In the event a customer discloses a disability, the seamless delivery of our services relies on assistive devices and technology, as well as competent and well-trained staff. The Region VII Workforce Development Board will provide reasonable accommodation to qualified individuals with disabilities unless providing the accommodation would cause undue hardship.

N. A description of how the Local Board will ensure compliance with the Americans with Disabilities Act. The description should include how the Local Board will provide reasonable accommodations regarding materials, technology, and physical and programmatic accessibility of facilities. The description should also include how the Local Board will provide staff training and support for addressing the needs of individuals with disabilities.

The major resources and support services for individuals with disabilities are administered through the Division of Rehabilitation Services (DRS). The Region VII Workforce Development Board will coordinate services and resources with core programs and other partners to provide services to individuals with disabilities and other populations under the Act. Streamlined customer access is available for all populations with special services for disabled individuals. The Region VII WDB utilizes a Voluntary Self-Identification of Disability form for individuals to disclose a disability. A referral system is also in place to ensure customers receive rehabilitation assessments and services.

In addition to website services, computers, copy machines, and phones, there are additional services that will be handled in-house or by referral. Clients will be referred to DRS when in need of ADA compliant computers, Interpretive system for hearing impaired, and sign language communication assistance. Currently, both comprehensive One-Stop Career Centers are ADA compliant.

The Grievance Procedure is posted in both comprehensive One-Stop Career Centers in the region. The Equal Opportunity Officer will ensure that staff and partners receive ongoing professional development and are advised of changes in law and policy. The EEO tag line is included on all outreach and recruitment materials and advertisements.

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

The Region VII Workforce Development Board is committed to serving individuals with disabilities. We incorporate a variety of assistive technology and devices to ensure all clients receive a seamless delivery of employment services. Each One-Stop is ADA compliant, as well as equipped with a computer work station that allows: physical accessibility, services for the deaf and hard of hearing, telecommunication/TTY devices, sign language interpreter services (by appointment), services for the blind and vision impaired, and enlarged print. All of the aforementioned assistive technology/devices are available upon request. In addition, the Region VII WDB prominently displays the Telecommunications Device for the Deaf (TDD) WV Relay 7-1-1 throughout the One-Stop and on all printed materials such as brochures, flyers, business cards, etc.

Region VII WDB staff and our One-Stop partners are well-versed in serving customers with disabilities. We rely on a combination of state-led and self-led trainings. There are several websites and organizations the Region VII WDB has found helpful in maintaining staff awareness and education on serving individuals with disabilities. They include the following websites. Microsoft Accessibility Resource Centers (www.microsoft.com/enable/centers) are available in the United States. These centers provide expert consultation on assistive technology and accessibility features built into Microsoft Products. The Alliance for Technology Access (www.ataccess.org) and the Association of Assistive Technology Act Programs (www.ataporg.org/) are other U.S. networks dedicated to providing information and technology support services to people with disabilities. The Rehabilitation Engineering and Assistive Technology Society of North America, known as RESNA (www.resna.org), offers certification programs for assistive technology practitioners. RESNA is another source for identifying assistive technology experts who can assist organizations in North America. In addition, online training and web seminars are available for learning specific types of assistive technology products. Primary sources for online training include: Accessibility for Businesses and Organizations (www.microsoft.com/enable/business/), the Assistive Technology Industry Association (www.atia.org), and the HP Guide to Selecting Assistive Technology (www.hp.com/hpinfo/abouthp/accessibility/atproduct.html).

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

In the One-Stop Career Center locations when no one speaks the needed language, staff has access to automated translation websites. Resources are available at the reception desk at both One-Stop Career Centers to assist staff with addressing language barriers resulting from increasingly diverse populations seeking our services. Language manuals are also available to WIOA and One-Stop Career Center staff.

Q. A description of the Local Board's procurement system, including a statement of

assurance that the procedures conform to the standards in DOL regulations set forth in 2 CFR 200.

The following are the Region VII Workforce Development Board's procurement procedures:

1. The Region VII WDB shall avoid purchasing items that are not necessary or duplicative for the performance of the activities required by a federal award. (2 CFR Part 200.318(d))
2. Where appropriate, an analysis shall be made of lease and purchase alternatives to determine which would be the most economical and practical procurement for the federal government (2 CFR Part 200.318(d)). This analysis should only be made when both lease and purchase alternatives are available to the program.
3. Purchasers are encouraged to enter into state and local inter-governmental or inter-entity agreements where appropriate for procurement of use of common or shared goods and services (2 CFR Part 200.318 (e)).
4. Purchasers are encouraged to use Federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs (2 CFR Part 200.318 (f)).
5. Documentation of the cost and price analysis associated with each procurement decision in excess of the simplified acquisition threshold (\$150,000) shall be retained in the procurement files pertaining to each federal award (2 CFR Part 200.323).
6. All pre-qualified lists of persons, firms or products which are used in acquiring goods and services must be current and include enough qualified sources to ensure maximum open and full competition (2 CFR Part 200.319 (d)).
7. The Region VII WDB will maintain records sufficient to detail the history of procurement, including: (2 CFR Part 200.318 (i))
 - a) Rationale for the method of procurement
 - b) Selection of contract type
 - c) Contractor selection or rejection
 - d) The basis for the contract price
8. The Region VII WDB shall make all procurement files available for inspection upon request by a federal awarding agency.
9. The Region VII WDB shall not utilize the cost-plus-a-percentage-of-costs method of contracting (2 CFR Part 200.323 (d)).
10. 2 CFR 200.318 states that non-federal entities will reflect applicable state laws and regulations "which... conform to applicable federal law." All purchases must also follow West Virginia Code Section 5A-3-1 et seq., and the Code of State Rules Section 148-1-1 et. seq. The Purchasing Division Procedure Handbook can be found at:
<http://www.state.wv.us/admin/purchase/Handbook/default.html>

All staff members with the authority to approve purchases will receive a copy of and be familiar with 2 CFR Part 200.400-475, Cost Principles. For additional information, see **Attachment V**, Eastern West Virginia Community Action Agency, Inc. Accounting & Financial Policies and Procedures Manual. Eastern West Virginia Community Action Agency, Inc. is the current and fiscal and administrative agent for the Region VII Workforce Development Board.

R. A description of any documentation to demonstrate that the acquisition, management, and disposition of property adhere to the Property Management Procedures taken from DOL regulations 2 CFR 200.

Please see page 87 of **Attachment V**, Eastern West Virginia Community Action Agency Inc. Accounting & Financial Policies and Procedures Manual for a description of the procedures for the acquisition, managements, and disposition of property.

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

The Region VII Workforce Development Board has all board members and Local Elected Officials board members sign a Conflict of Interest Statement, see **Attachment W**. In accordance with West Virginia State Code 6B-2-5, the Region VII WDB also has a detailed Conflict of Interest Policy outlined within Region VII WDB By-laws. The policy states:

A member of the local board or committee must neither case a vote on, nor participate in any decision-making capacity on the provision of services by such member or by an organization that such member directly represents, nor or any matter that would provide any direct benefit to such member or the immediate family of such member. Immediate family means a spouse residing in the individual's household and any dependent child or children and dependent parent or parents.

A board or committee member who participates in decisions relating to specific terms of a contract, the determination of performance standards in a contract, or the development of Request for Proposals or other processes leading to a contract, is prohibited from receiving any direct financial benefit from any resulting contract.

Any board or committee member with a potential conflict of interest must disclose that fact to the Local Workforce Development Board as soon as the potential conflict is discovered. If the potential conflict of interest is discovered during a board or committee meeting, the member must declare such potential conflict and excuse themselves from the remainder of the discussion and vote on that item. A board or committee member shall not engage in any business transaction or private for profit arrangement which accrues from that member's position on the board.

If the board believes that a conflict of interest provision has been violated, it can recommend to WorkForce West Virginia and the chief elected official of the workforce area that the member who has violated a provision be removed as a member of the board.

The chief elected official can remove a member of the board for a violation of conflict of interest code with or without a recommendation from the board.

T. A description of the Local Board or fiscal agent's accounting procedures, including the procedures used in preparing reports to the State. In addition to the requirement that all financial transactions be conducted in compliance with Generally Accepted

Accounting Principles (GAAP) the fiscal management system must include the following in the accounting procedures. This description must address how the fiscal system:

- **Tracks funding types, funding amounts, obligations, expenditures, and assets**
 - The fiscal agent uses the Abila MIP accounting system. This system allows for multiple tracking of activity. The WDB's activity is segregated by a unique fund code. Also, all grants, projects, and programs have a separate and unique code. The fiscal agent is a 501 (c) 3 and all accounting procedures are in compliance with GAAP and 2 CFR 200.
- **Permits the tracking of program income, stand-in costs, and leveraged funds**
 - All program income, stand-in costs, and leveraged funds will be coded to the appropriate general ledger code and coded to the specific grant program that receives the benefit. See **Attachment V**, Eastern West Virginia Community Action Agency Inc. Accounting & Financial Policies and Procedures Manual.
- **Is adequate to prepare financial reports required by the State**
 - The fiscal agent is staffed by the Certified Public Accountant (CPA) with over 25 years of experience. The fiscal agent manages multiples grants and programs for various agencies and has the accounting system in place to provide any reports needed. See **Attachment V**, Eastern West Virginia Community Action Agency Inc. Accounting & Financial Policies and Procedures Manual. The attached accounting manual is intended to provide an overview of the accounting policies and procedures for Eastern West Virginia Community Action Agency Inc., and fiscal agent for the Region VII Workforce Development Board. EWVCAA is incorporated in the state of West Virginia. The agency is exempt from federal income taxes under IRC Section 501(c)(3) as a nonprofit corporation. Attachment V documents the financial operations of EWVCAA and Region VII WDB. Its primary purpose is to formalize accounting policies and selected procedures for all staff that have a role in accounting processes and to document internal controls. If a particular grant or award has provisions that are more restrictive than those in the EWVCAA Accounting & Financial Policies and Procedures Manual, the more restrictive provisions will be followed only for that grant or award. The contents of **Attachment V** were approved as official policy of the EWVCAA by the Board of Directors, Executive Director, and Chief Financial Officer. The Region VII WDB adheres to the accounting and financial policies and procedures of EWVCAA per the contract/statement of work that establishes EWVCAA as the fiscal agent for the Region VII WDB.

U. An identification of key staff who will be working with WIOA funds.

Mr. Thomas J. Van Meter, an Eastern WV Community Action employee, will serve as the WDB's Executive Director and report directly to the Region VII WDB. Mr. Matthew H. Martin, an Eastern WV Community Action employee, will serve the Board as the Assistant Executive Director for Region VII. Ms. Stacy Swick, an Eastern WV Community Action employee, will serve the Board as the Compliance Director and EO Officer for Region VII. Eastern WV Community Action will not govern nor attempt to govern the day-to-day operations of the Region VII Workforce Development Board. Eastern WV Community Action Agency is not a WIOA approved Training Provider. Eastern WV Community Action Agency's Administrative Assurances are applicable to any officer, employee, agent, or staff of the WDB.

V. A description of how the Local Board's (or fiscal agent's) financial system will permit tracking of funds to a level adequate to establish that funds have not been used in violation of WIOA standards or DOL regulations.

The fiscal agent, Eastern West Virginia Community Action Agency, Inc., relies on WorkForce West Virginia for guidance on issues related to the Workforce Innovation and Opportunity Act (WIOA) guidelines and Department of Labor (DOL) regulations. The Region VII Workforce Development Board has attended many WIOA education seminars as the Act has been implemented. The Region VII WDB qualifies all eligible participants to the appropriate program and notifies the fiscal agent via invoice coding the proper program to charge. The fiscal agent has all of the data segregated so the proper grant will be charged when the invoice is entered.

W. Provide a brief description of the following:

- **Fiscal reporting system** – Abila MIP fund accounting system
- **Obligation control system** – Abila MIP fund accounting system
- **ITA payment system** – Abila MIP fund accounting system. Specifically, all Region VII WDB Training Provider MOUs contain an ITA payment methodology in Section 5, Part L(i-x) of the respective Training Provider MOU. The training provider understands that WIOA funding is not an entitlement. Submit for one-half of the semester/term/payment at the beginning of the semester/term/mid-point. The training provider may bill at the end of the term. Submit for second one-half payment of semester/term at the semester/term midway point. The training provider may bill at the end of the term. Invoices must contain the following information – participant's full name, social security number, program, name, semester/term begin and end date, amount billed, and period covered. Accompanying the invoice must be a copy of the student's progress report. Region VII WDB will provide a signed copy of the participant's Release of Information form. If the participant drops out of the training program between disbursement periods, the balance will be prorated, unless the student or the school has negotiated other terms with the WDB Director in advance of separation. Programs costs charged by the training provider will be based on prices provided by the applicant in the training provider application. Any price variation from the prices that are contained in the training provider application will require written justification from the training provider. If the

training provider provides tuition or fee rates less than the application tuition to any WDB sponsored customer, the lower rate will apply. The amounts payable to the vendor as tuition and/or fees for each WDB sponsored participant enrolled by the Training Provider, as well as the specific program into which each WDB sponsored customer is to be enrolled, shall be specified on the ITA. Tuition estimates for future terms are acceptable. Training costs are approved up to a maximum of \$6,000. The WDB will not pay for any remedial or pre-requisite classes. The training providers shall submit a separate bill/invoice for each WDB participant enrolled in accordance with the payment schedule previously outlines in this procedure.

Once an invoice is received, it is first reviewed by the Compliance Director. It is then sent to the Region VII WDB Executive Director for a final approval. If everything is in order, the invoice is sent to our fiscal agent (EWVCAA) for payment.

- **Chart of account system** – Abila MIP fund accounting system. Specifically, the charts of account is the framework for the general ledger system and the basis for the accounting system. The chart of accounts consists of account titles and account numbers assigned to the titles. General ledger accounts are used to accumulate transactions and the impact of these transactions on each asset, liability, net asset, revenue, expense, and gain and loss account. The chart of accounts is comprised of six types of accounts: 1. Assets. 2. Liabilities. 3. Net Assets. 4. Revenues. 5. Expenses. 6. Gain and Losses. In addition to a general ledger code, there are the following: program code – 2 digits, project code – 4 digits, and grant code- 3 digits. All employees involved with account coding or budgetary responsibilities will be issued a current chart of accounts, or the section of the chart of accounts applicable to their program. As the chart of accounts is revised, an updated copy of the chart of accounts shall be promptly distributed to these individuals. The Chief Financial Officer monitors and controls the chart of accounts, including all account maintenance, such as additions and deletions. Any additions or deletions of accounts must be approved by the Chief Executive Officer, who ensures that the chart of accounts is consistent with the organizational structure and meets the needs of each division and department.
- **Accounts payable system** – The following are general policies for accounts payable:
 - Assets or expenses and the related liability are recorded by an individual who is not responsible for ordering and receiving.
 - The amounts recorded are based on the contractor invoice for the related goods or services.
 - The contractor invoice should be supported by an approved purchase order where required by organization policy and should be reviewed and approved by a Program Manager prior to being processed for payment.
 - Invoices and related general ledger account distribution codes are reviewed prior to posting to the subsidiary system.

The primary objective for accounts payable and cash disbursements is to ensure that:

- Disbursements are properly authorized.

- Invoices are processed in a timely manner.
- Contractor credit terms and operating cash are managed for maximum benefits.

All valid accounts payable transactions, properly supported with the required documentation, shall be recorded as accounts payable in a timely manner. Accounts payable are processed on an as needed basis. Information is entered into the system from approved invoices with appropriate documentation attached. Only original invoices will be processed for payment unless duplicated copies have been verified as unpaid by researching the contractor records. Invoices received via email will be printed, and forwarded to the appropriate program manager or director for approval. Any additional copies of the emailed invoice will be deleted. Finally, no payments will be made from contractor statements.

- **Staff payroll system** – Abila MIP fund accounting system. See pages 67-71 of **Attachment V**, Eastern West Virginia Community Action Agency, Inc. Accounting & Financial Policies and Procedure Manual, for information on the Region VII Workforce Development Board's staff payroll system.
- **Participant payroll system** – Abila MIP fund accounting system. Time sheets are submitted to the appropriate Region VII WDB staff for approval. The time sheet is then sent to the Region VII WDB Executive Director for a final approval. If everything is in order, the time sheet is sent to our fiscal agent (EWVCAA) for payment. In the case of a youth time sheet, it is approved by the Assistant Executive Director then sent to the youth services provider (United Way of the Eastern Panhandle) for processing.
- **Participant stipend payment system** - Abila MIP fund accounting system. Stipends are submitted to the appropriate Region VII WDB staff for approval. The stipend is then sent to the Region VII WDB Executive Director for a final approval. If everything is in order, the stipend is sent to our fiscal agent (EWVCAA) for payment. In the case of a youth stipend, it is approved by the Assistant Executive Director then sent to the youth services provider (United Way of the Eastern Panhandle) for processing.

X. A description of the Local Board's (or fiscal agent's) cash management system, providing assurance that no excess cash will be kept on hand, and that procedures are in place to monitor cash.

All grants are on a reimbursement basis. Funds are not requested from WorkForce West Virginia until the expenditure has been incurred thus no excess cash will be kept on hand.

Y. A description of the Local Board's cost allocation procedures including:

- **Identification of different cost pools**
- **Procedures for distribution of staff costs between cost categories (Administrative**

cost, program cost, and indirect cost)

- **Procedures used for distribution of funds from each cost pool**
- **Description of funds included in each cost pool**
- **Description of cost allocation plans for American Job Centers.**

2 CFR 200 “Uniform Grant Guidance” establishes the principles for determining costs of grants, contracts, and other agreements with the Federal Government. Region VII Workforce Development Board’s Cost Allocation Plan is based on the Direct Allocation method described in 2 CFR 200. The Direct Allocation Method treats all costs as direct costs except general administration and general expenses.

Region VII WDB is currently operating under a fiscal management agreement with Eastern West Virginia Community Action Agency, Inc. In that agreement Region VII WDB’s payroll and accounts payable are included in EWVCAA’s accounting system under separate fund, program, project, and grant codes to allow for proper segregation of expenses.

American Job Centers are currently operating under a fiscal management agreement with Eastern West Virginia Community Action Agency, Inc. In that agreement the American Job Center’s payroll and accounts payable are included in EWVCAA’s accounting system under separate fund, program, project, and grant codes to allow for proper segregation of expenses.

General and Administrative costs will be segregated in a category as WDB Admin. This admin will be allocated to the grants based on direct labor hours. Region VII WDB occasionally receives grant monies that have no admin included in them. These grants are normally agreements with Workforce WV and some other entity to expand the workforce readiness opportunities for clients. In these case WDB admin will not include labor hours from these grants and agreements.

Direct Costs are those that can be identified specifically with a particular final cost objective. Shared costs are those that have been incurred for common or joint objectives and cannot be readily identified with a particular final cost objective.

Only costs that are allowable, in accordance with the cost principles, will be allocated to benefitting programs by Region VII Workforce Development Board.

General Approach

The general approach of Region VII WDB in allocating costs to particular grants and contracts is as follows:

1. All allowable direct costs are charged directly to programs, grants, activity, etc.
2. Allowable direct costs that can be identified to more than one program are prorated individually as direct costs using a base most appropriate to the particular cost being prorated.

3. All other allowable shared costs (costs that benefit all programs and cannot be identified to a specific program) are allocated to programs, grants, etc. using a base that results in an equitable distribution.

Allocation of Costs

The following information summarizes the procedures that will be used by Region VII WDB beginning January 1, 2017.

- 1) Compensation for Personal Services – Documented with timesheets showing time distribution for all employees and allocated based on time spent on each program or grant. Salaries and wages are charged directly to the program for which work has been done. Program Costs that benefit more than one program will be allocated to those programs based on the ratio of each program's client numbers to the total of client numbers for the previous quarter. (See Attached timesheet)
 - a) Fringe benefits (FICA, SUTA, Disability Insurance, Health Insurance, Workers Compensation, and Retirement) are allocated in the same manner as salaries and wages.
 - b) Annual Leave, holiday, and Sick Leave are allocated based on total labor hours charged on the timesheet.
- 2) Travel Costs – Allocated based on purpose of travel. All travel costs (local and out of town) are charged directly to the program for which the travel was incurred. Travel costs that benefit more than one program will be allocated to those programs based on the ratio of each program's labor hours to the total of such labor hours.
- 3) Professional Services Costs (such as consultants, accounting and auditing services)- Allocated to the program benefitting from the service. All professional service costs are charged to directly to the program for which the service was incurred. Costs that benefit more than one program will be allocated to those programs based on the ratio of each program's labor hours to the total of such labor hours.
- 4) Office Expense and Supplies (including office supplies and postage) – Allocated based on usage. Expenses used for a specific program will be charged directly to that program. Postage expenses are charged directly to programs to the extent possible. Costs that benefit more than one program will be allocated to those programs based on the ratio of each program's labor hours to the total of such labor hours.
- 5) Equipment – Region VII WDB depreciates equipment when the initial acquisition cost exceeds \$5,000. Items below \$5,000 are reflected in the supplies category and expensed in the current year. Equipment purchases are made in accordance with Workforce WV policies and procedures and state of West Virginia procurement rules. Depreciation costs are all charged to the appropriate program.
- 6) Printing (including supplies, maintenance and repair) – Expenses are charged directly to programs that benefit from the service. Expenses that benefit more than one program are

allocated based on the ratio of the labor hours to total labor hours. Costs that benefit more than one program will be allocated to those programs based on the ratio of each program's labor hours to the total of such labor hours.

- 7) Insurance- Insurance needed for a particular program is charged directly to the program requiring the coverage. Other insurance coverage that benefits all programs is allocated based on the ratio of each program's labor hours to total labor hours.
- 8) Telephone/Communications – Long distance and local calls are charged to programs if readily identifiable. Other telephone or communications expenses that benefit more than one program will be allocated to those programs based on the ratio of each program's labor hours to the total of such labor hours.
- 9) Facilities costs for locations that house a single program are charged directly to the program, grant or agreement for the activity being carried on at that location. Facilities costs for locations benefitting more than one program are allocated to each program based on the ratio of direct labor hours to the total direct labor hours. Facility Costs include rent, utilities, telephone, etc.
- 10) Training/Conferences/Seminars – Allocated to the program benefiting from the training, conference or seminars. Costs that benefit more than one program will be allocated to those programs based on the ratio of each program's labor hours to total of labor hours.
- 11) Other Costs (including dues, licenses, fees, etc.) – Other joint costs that benefit more than one program will be allocated on labor hours.
- 12) Unallowable Costs – Costs that are unallowable in accordance with 2 CFR 200, including alcoholic beverages, bad debts, advertising (other than help wanted ads), contributions, entertainment, fines and penalties. Lobbying and fundraising costs are unallowable.

Z. A description of the Local Board's (or fiscal agent's) procedure for collecting debts involving WIOA funds.

Financial records kept by Eastern West Virginia Community Action Agency, Inc. on behalf of the Region VII Workforce Development Board are kept on an accrual basis. EWVCAA utilizes the Abila MIP fund accounting system. In **Attachment V**, Eastern West Virginia Community Action Agency, Inc., Accounting & Financial Policies and Procedures Manual, page 48 reads as:

ACCOUNTS RECEIVABLE MANAGEMENT

Monitoring and Reconciliations

On a monthly basis, the Accounting Department will reconcile a detailed accounts receivable report (showing aged, outstanding invoices by customer) to the general ledger. The Chief Financial Officer will review the reconciliation and ensure that all differences are immediately investigated and resolved.

Credits and Other Adjustments to Account Receivable

From time to time, credits against accounts receivable from transactions other than payments and bad debts will occur. Examples of other credits include returned products and adjustments for billing errors. An employee who is independent of the cash receipts function will process credits and adjustments to Account Receivable, and all credits shall be authorized by the Chief Financial Officer.

Accounts Receivable Write-Off Authorization Procedures

All available means of collecting accounts receivable will be exhausted before write-off procedures are initiated. Write-offs are initiated by the department associated with the amount to be written off, in conjunction with the Accounting Department. If an account receivable is deemed uncollectible, the following approvals are required before the write-off is processed:

<u>Amount</u>	<u>Authorized in writing by</u>
Less than \$1,500	Chief Financial Officer
\$1,500 or more	Executive Director

Once a write-off has been processed, appropriate individuals in the originating department will be advised to ensure that further credit is not granted and the master list of bad accounts is updated. Customers listed as poor credit risks will be extended future credit only if the back debt is paid and the customer is no longer deemed a collection problem.

If write-off procedures have been initiated, the following account treatment applies:

1. Current year invoices that are written off will either be charged against an appropriate revenue or revenue adjustment account, or against the original account credited.
2. Invoices written off that are dated prior to the current year will be written off against net assets.

In addition, the Region VII Workforce Development Board and the fiscal/administrative agent, Eastern West Virginia Community Action Agency, Inc., would exercise all legal measures to collect any debt. However, the chance of incurring a debt is extremely rare since vendors are only paid after a service has been rendered.

REGIONAL PLAN GUIDANCE

Section 1: Regional Analysis

- A. Existing and emerging in-demand industry sectors and occupations, and their employment needs.

A review of **Attachment X**, West Virginia’s Occupational Projections: 2016-2026 lists the following as the top ten “growth fields” based on the number of annual openings:

• Combined Food Preparation and Serving Workers	3,984
• Cashiers	3,758
• Retail Salesperson	3,700
• Office Clerks, General	2,806
• Personal Care Aides	2,545
• Waiters and Waitresses	2,347
• Laborers and Freight, Stock, Material Movers	1,696
• Customer Service Representatives	1,672
• Registered Nurses	1,486
• Janitors and Cleaners	1,350

Also, please see **Attachment Y**, the Region VII Workforce Development Board’s In-Demand Occupation List.

B. Demographic characteristics of the current workforce, including the educational and literacy levels, with emphasis on youth, adults in transition, and individuals with disabilities. Describe how the local area’s demographics are changing and the planning implications for the anticipated workforce of the future.

Please see the response to Section 1, Question 3. The Region VII local area is also recognized by the Governor as a local region, as referred to in the Act in Chapter 2 – Local Provisions Section 106(a)(2)(A).

C. Knowledge and skills needed to meet the employment needs of the employers in the region, including employment needs in in-demand industry sectors and occupations.

Please see the response to Section 1, Question 2. The Region VII local area is also recognized by the Governor as a local region, as referred to in the Act in Chapter 2 – Local Provisions Section 106(a)(2)(A).

D. Analysis of the workforce in the region, including current labor force employment/unemployment data, labor market trends, and the educational and skills levels of the workforce in the region, including individuals with barriers to employment.

Please see the response to Section 1, Question 3. The Region VII local area is also recognized by the Governor as a local region, as referred to in the Act in Chapter 2 – Local Provisions Section

106(a)(2)(A).

- E. Analysis of the workforce development activities (including education and training) in the region, including an analysis of the strengths and weaknesses of such services, and the capacity to provide such services, to address the identified education and skill needs of the workforce and the employment needs of employers in the region.**

Please see the response to Section 1, Question 4. The Region VII local area is also recognized by the Governor as a local region, as referred to in the Act in Chapter 2 – Local Provisions Section 106(a)(2)(A).

Section 2: Regional Sector Strategies

- A. Identify which in-demand industry sector(s) or occupation(s) the Local Boards in the region is/are serving and why.**

The Region VII Workforce Development Board identifies the following industry sectors and related occupation as critical areas of need for the on-going development and strengthening of the local area and regional economy: Advanced Manufacturing, Energy, Healthcare, and Information Technology. The aforementioned industry sectors are not only growing in the local area and region but also state-wide. WorkForce West Virginia, the West Virginia Community and Technical College System, and the local Workforce Development Boards continue to work together in order to identify employer needs as well as skills gaps in the workforce. An analysis of labor market information in conjunction with effective sector strategy partnerships, gives WIOA stakeholders the ability to develop career pathways through higher education, on-the-job training, or apprenticeships. The chosen training avenue is driven by the employer. The Region VII WDB remains committed to meeting the needs of a growing and changing regional economy through workforce development and education.

- B. Describe the current status of regional collaboration in support of the sector/occupation, and identify anticipated next steps and timelines for at least the first two years of plan implementation.**

Through our Sector Strategy Partnership (SSP) meetings, the Region VII WDB has successfully identified a need to restructure advanced manufacturing training in the region. Blue Ridge Community and Technical College has an Industrial Maintenance and Mechatronics A.A.S. program. These programs are designed to be two-years in length and successful completers earn an Associate's Degree. Recent SSP meetings have resulted in an open-ended career pathway to these degrees. Blue Ridge CTC has developed a three-part series for each degree that allows and individual opportunities for three separate entry points. Completion of each section results in a

stand-alone industry recognized credential and certification, such as, Water Treatment Purification, OSHA 30, Programmable Logic, Forklift Certification, etc. The flexibility of the career pathways mentioned above allow participants to obtain the skills employers need. It also enables students to set short-term and intermediate goals via certifications, and ultimately leading to skills upgrades and in many cases a two-year degree.

Section 3: Regional Service Strategies

A. Identify and describe which populations and/or service strategies and/or services will be developed on a regional basis.

All Adult and Dislocated Workers will be provided WIOA Career and Training Services through the comprehensive WorkForce West Virginia Career Centers located in Martinsburg and Moorefield. Career Services may be obtained at any WorkForce West Virginia Career Center, or by use of the Internet. Training Services may be provided to WIOA eligible job seekers that do not have skills necessary to secure immediate employment and will be coordinated by a WorkForce West Virginia Career Center WIOA Career Coach. Training Services will be constantly monitored by the WDB to ensure both quality and success by the approved provider. The Region VII WDB reserves the right to remove a Training Provider or a Training Providers program from our approved regional list if there is a problem related to performance or quality.

Services will be provided to current workers, emerging workers, incumbent workers or dislocated workers, the disabled, veterans, low-income, including former and/or older workers re-entering the workforce. Eligibility for services will be in accordance with the WDB Priority of Service Policy and the WDB's Self-Sufficiency Income Level Policy.

Description and assessments of the type and availability including activities for disabled and non-disabled are administered prior to enrollment and annually to measure progress. The Region VII WDB services out-of-school youth between ages 16-24 and existing in-school youth.

Activities and services provided are as follows:

- Career training – classroom with instruction, attainment of education credentials.
- Employment training – work experiences, on-the-job training, occupational skills training, and job search.

In addition, the fourteen WIOA Youth Program elements are incorporated as services in program design and provided (when applicable) to youth program participants. These elements include:

- Tutoring, study skills training
- Alternative secondary school services, or dropout recovery services

- Paid and Unpaid work experience
- Occupational skill training
- Education offered concurrently with and in the same context as workforce preparation activities and training
- Leadership development opportunities
- Supportive Services
- Adult Mentoring
- Follow-up services
- Comprehensive guidance and counseling
- Financial Literacy
- Entrepreneurial skills training
- Services that provide labor market and employment information
- Activities that help youth prepare for and transition to post-secondary education and training

Section 4: Coordination with Regional Economic Development Organizations

- A. Identify regional economic development services and providers in the region and describe how the Local Board(s) will coordinate services with these services and providers.**

The Small Business Development Center (SBDC) is co-located at the comprehensive One-Stop Career Center location in Martinsburg. This allows the Region VII One-Stop Career Center to provide SBDC with appropriate referrals and for our mutual customers to receive direct and immediate benefit in regards to business plans, taxes, and incorporation and other issues important to the development of a business. Microenterprise and entrepreneurial training takes place through regular workshops as well as individual meetings and appointments facilitated by SBDC staff. We will continue to support entrepreneurial development efforts throughout the region including the development and expansion of related training in support of entrepreneurial development. The Region VII WDB coordinates regional economic development with our local Economic Development Administration (EDA) partners. Our EDA partners attend our Sector Strategy Partnership meetings. Also, the Region VII WDB has two county EDA Executive Directors that serve on our board. The Regional Manager for the WVDO actively participates in many of our Sector Strategy Partnership meetings. Effective planning and coordination with SBDC, EDA, and WVDO allows the Region VII WDB to serve employers in a comprehensive and responsive way.

Section 5: Coordination of Transportation and/or Other Support Services

- A. Describe whether transportation or other support services need to be coordinated across the region based on the regional analysis, and if so which services and how.**

The Region VII WDB acknowledges that a lack of transportation continues to be a barrier to employment within our local area and region. While public transit exists, it is not readily available to all of our customers. Reliable public transit in our population centers exists and in many

instances provides bus routes to the major employers as well as our comprehensive One-Stop Centers. However, due to much of the region being of a rural nature, public transit from home-to-work is not always possible, nor financially feasible. In effort to fill this area of need, the Region VII WDB has developed a Supportive Service Policy. The policy allows for WIOA customers to log time/attendance sheets and be reimbursed at a flat rate per day for the costs of travel, child care, and other related costs to training and searching for work. Please **Attachment I** which is the Region VII WDB's Supportive Services Policy.

Section 6: Regional Cost Arrangements, As Appropriate

- A. Describe cost arrangements in the region for costs associated with items 1 through 5 above, which may include the pooling of administrative costs.**

There are currently no plans in place for coordination of administrative costs or for pooling of funds for administrative costs. Regional Partners will be exploring ways to effectively and efficiently coordinate cost.

Section 7: Regional Performance Negotiation

- A. Single area regions may describe the process used to negotiate performance. Describe how a region consisting of multiple workforce areas will collaboratively negotiate and reach agreement with the Governor on local levels of performance and report on performance accountability measures.**

This is not applicable to Region VII since our local area is our region.

**Statement of Approval
Local Workforce Development Plan**

The signatures below certify that the attached Local Workforce Development Plan (including Administrative Assurances) have been reviewed and approved by the Chief Local Elected Official and the Workforce Development Board.

Local Workforce Area Region VII Workforce Development Board

Board Contact Person T.J. Van Meter, Executive Director Phone No. 304-530-5258

Fiscal Agent Eastern WV Community Action Agency Phone No. 304-538-7711


Chief Local Elected Official

Scotty Miley – Chief Local Elected Official

Workforce Development Board Chair

Layne Diehl – Workforce Development Board

 06/29/2022
Signature Date

 6/22/2022
Signature Date