

Workforce Investment Act

# **Local Workforce Investment Area Plan**

**Cumberlands**

Local Workforce Investment Area Name

**Effective July 1, 2007 - June 30, 2009**

Years Three and Four of the Five-Year Plan, July 1, 2005 thru June 30, 2010

**Lake Cumberland Area Development District, Inc.**

Name of Fiscal Agent for Local Workforce Investment Area

**P.O. Box 1570, Russell Springs, Kentucky 42642**

Address of Fiscal Agent

# **SIGNATURE PAGE**

Local Workforce Investment Area Plan For:

**Cumberlands**

**LWIA Name**

This Local Workforce Investment Area Plan has been approved and is being jointly submitted by the appropriate chief elected official(s) (CEO) and the Local Workforce Investment Board (LWIB). (In addition to their signatures, please type or print the names and titles of these individuals.)

## **CEO(s)**

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Signature (Chief Elected Official)

Date

Lawrence Kuhl

Laurel County Judge Executive

Printed/Typed Name

Title

## **LWIB**

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Signature (Chair, Workforce Investment Board)

Date

Wendell Emerson

Chairman

Printed/Typed Name

Title

# **CUMBERLANDS WORKFORCE INVESTMENT AREA WORKFORCE PLAN**

## **I. Local Vision**

The Cumberland Workforce Investment Board (Cumberland WIB), has a long tradition of highly collaborative efforts to meet the workforce needs of job seekers and employers. It is the intent of the CWIB to take full advantage of the Workforce Investment Act (WIA) to support, complement and enhance the existing workforce development system to better meet the needs of its citizens.

The strategies, goals, and objectives used in the Area are continuously reviewed to reflect the environment in this economic area. The Cumberland Workforce Investment Board has measures, goals and objectives and has built a regional partnership with shared responsibilities to create a coordinated workforce development system. This system, in concert with State priorities will; guide Local financial resources in a manner that promotes a high quality, globally competitive workforce; foster high skill/wage jobs for all populations; provide economic leadership for the Area; and offer a better standard of living for our citizens.

The CWIB will continue to work to improve the quality of the Area workforce readiness delivery system as it intersects with labor market supply and demand. This will include a thorough analysis of the effectiveness of employment training, education and social services organizations, programs and policies. This approach will continue to be the catalyst in encouraging collaboration between the private sector and critical entities necessary to the regions long-term economic success.

The Cumberland Workforce Investment System emphasizes “demand side” strategies which focuses on identifying and meeting employer needs in the workforce, such as changing unemployment rates, concerns about educational development and low worker productivity. This requires getting involved with partners in the private sector, the economic development community, and other agencies.

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### II. Local Workforce Investment Priorities

**Identify the workforce investment needs of businesses, job seekers, and workers in your local workforce investment area and the process you utilized in making this determination.**

#### ANALYSIS OF THE CURRENT SITUATION

The Cumberland Workforce Investment Area (CWIA) assessment of the needs of employers, job seekers and workers, and the current workforce system utilized the following methods in developing its strategy:

- An assessment of the present and past history of workforce development in the Cumberland Workforce Area and the level of service we wish to achieve.
- Regional and local labor markets and influences of state and national economic factors and trends were analyzed by using a blend of local, state and national data and interviews with employers.
- The needs and expectations of employers, job seekers, and elected officials were assessed.
- Gaps were identified between the needs identified in step three above, and the workforce development system, as it presently exist and changes that could be made to enhance delivery and services.
- Action items were developed by the Cumberland WIB and stated in its strategic plan that set the area vision, goals, specific strategies, and immediate performance objectives.
- Developed service strategies, identified resources, and drafted the strategic plan using data gathered from the activities above.

#### Summary of Gaps Identified

Commonly stated gaps in local workforce development efforts are summarized in three categories of affecting employers, workers and job seekers, and workforce delivery partners.

#### **Gaps and deficiencies in local workforce development efforts affecting *employers* include:**

Local supply of *qualified* entry level applicants to meet demand.

Basic communications difficulties (written and oral) inhibit employee selection and advancement.

Entry-level job applicants are transient in that they lack loyalty to employers and continuity in career development from job-to-job.

Workers lack respect for employers, employment in general, and themselves. Without work ethics, problem solving skills, teamwork abilities, listening skills, written and oral communications skills, workers cannot compete in the workforce.

Availability of skilled labor remains a very challenging issue for manufacturers. The most critical area of shortage exists among entry-level front-line (“skilled”) workers. The Cumberland WIA is working to put an emphasis on trade school which produces certified electricians, carpenters, plumbers, plant operators, equipment maintenance technicians, and crafts persons with construction skills.

Economic development must work with workforce development efforts, to provide the skilled workers and the supply of these workers.

Childcare assistance and transportation are critical and economically disadvantaged individuals leave or avoid welfare and successfully enter into the workforce.

The job referral system has not ensured that only qualified applicants were referred to interviews with employers.

Job seekers are not punctual for employment interviews and do not attend with a positive attitude, dressed appropriately, and being drug-free.

In general, there has been a lack of knowledge regarding workforce development opportunities.

Labor market information is available statewide and at a local level. Coordination of these services is critical in the delivery of workers with occupational skills to employers with job openings.

Historically, the services offered have missed or omitted some valuable factions in the workforce community, specifically criminal justice agencies. For example, the at-risk youth who are on the periphery of criminal activity have not been served adequately.

**Gaps and deficiencies in local workforce development efforts affecting *workers/jobseekers* include:**

The availability and affordable transportation complicates the delivery of residents to training, services, and employment opportunities.

The availability and affordable, high quality, child care is a barrier to employment, especially when considered with the transportation issues of a rural environment.

The needs of disadvantaged and disabled individuals for workforce development services must continue to be a priority.

The fastest growing occupations require higher basic, job specific, and soft skills than static occupations. Competitive jobseekers and incumbent workers will need access to integrated comprehensive training services.

In summation, workers must possess communication skills, critical thinking skills, group interaction skills, personal development skills, time management skills, team and technology system skills, leadership skills and employability skills, in addition to basic educational skills. With today's continued emphasis on technology, they must also understand technological innovations and related issues affecting their personal and professional lives. In order to assist employers in meeting their workforce needs, the CWIA will utilize the ACT WorkKeys. These assessments are scored on a set of established skill scales to provide an accurate, systematic way to measure workers' abilities and training needs.

**Gaps and deficiencies in workforce development affecting *workforce delivery partners* include:**

Continue to refine and integrate the access to multiple programs at the same time in the workforce system.

Computer accessible referrals between partners. Having more partners involved in the Kentucky MIS EKOS System.

The involvement of Faith Based community organizations in the development of plans and programs must continue to be strengthened.

Continue to use job fairs as an effective approach to linking job seekers and employers. The CWIB will continue to host, coordinate, regional job fairs to provide job seekers and employers the opportunity to communicate in a positive environment.

### **III. Local Governance Structure**

#### **A. Local Workforce Investment Board (LWIB)**

The Cumberland Workforce Investment Board (CWIB) was established to provide workforce investment activities through statewide and local workforce investment systems. These activities are aimed at increasing the employment, retention, and earnings of participants, increasing the employment, retention, and earnings of participants, increasing occupational skill attainment by participants, improving the quality of the workforce, reducing welfare dependency, and enhancing the productivity and competitiveness of the United States and its states. The CWIB is comprised of 44 members nominated by a local Chamber of Commerce, Industrial Authority or other entity with signed approval from the Chief Local Elected Official from the county that the member will represent, twelve (12) of the forty-four (44) members represent WIA One-Stop partners and are appointed by the appropriate agency. The membership is comprised of a majority of business representatives, labor, education and community based organizations. A double quorum is in place to hold meetings. One, a quorum of the board and two, a majority of those present must represent the business sector. Each member serves a three year term with equal parts to be re-certified each year.

The CWIB sets policy for the Workforce Investment System within the area. This includes oversight of the one-stop system, youth activities and employment and training activities. All activities associated with this oversight such as selecting one-stop operators, selecting youth providers, budgets, negotiating local performance measures, and others as established by law.

The local elected officials have entered into an interlocal agreement with the CWIB. This sets aside provisions for election of a Chief Local Elected Official (CLEO) and states provisions in handling job training programs and funds.

#### **B. Structure/Process for local agencies and local Board to collaborate and communicate with each other and with the local workforce investment system.**

The Cumberland Workforce Investment recognizes the importance for communication and collaboration between each partner and non-traditional partners. One-Stop partners are represented on the Cumberland Workforce Investment Board (CWIB). Each member that sits on the board can communicate to others within their agencies the policies, strategies and goals that are established by the CWIB.

A consortium for the One-Stop Career Centers operation is in place. The partners in this consortium meet bi-monthly to discuss needs and strategies to enhance the One-Stop Career Centers.

Opportunities arise that bring workforce areas together to work on a common endeavor. The Cumberland Workforce Investment Area has a history of working with other bordering workforce areas to have Regional Job Fairs for both Adults and Youth. During layoffs or plant closings where affected employees may live in different workforce areas. We will work with those areas to assure services are delivered. The CWIA will continue to look for areas to expand its work through the

regional approach. Over the past two years the CWIA has submitted proposal for the USDOL WIRED Initiative and one submission of a Community-Based Grant for community colleges. Through this proposal a large area, that included many traditional and non-traditional partners, was targeted to be served. Four workforce areas agreed to be partners, while other workforce areas would have received benefits from the strategies set forth in these proposals. The CWIA is committed to continue working to find avenues to make these strategies a reality. These strategies will not become reality without a combined effort of all partners that are included in these proposals.

#### **IV. Local Economic and Labor Market Analysis**

##### **A. Identify the current and projected employment opportunities in your area and the job skills necessary to obtain such opportunities.**

###### *Lake Cumberland Area Occupational Outlook to 2010 - Highlights*

Between 2000 and 2010, the total annual job openings in the Lake Cumberland Area are expected to be about 8,579 a gain of 11.3%. Growth in employment will make available 858 job openings annually. Approximately 1,787 job openings will result from separations from the labor force due to retirement or those who transfer to other jobs. Approximately 32 % of job openings will result from growth and the remaining 68 % will result from separations from the labor force.

The greatest number of job openings will be the Sales and Related Occupations (311), followed by the Office and Administrative Support Occupation (299) and the Food and Preparation and Serving Related Occupations (284). Particular occupations with the largest percentage of change from 2000 to 2010 in the Lake Cumberland Area are Cost Estimators (61%), Personal Care and Home Care Aides (57%), Network and Computer Systems Administrators (56%) and Medical Assistants (56%). Others with expected large growth rates are in the Computer and Mathematical Occupations (46%), Legal Occupations (30%) and the Healthcare Support Occupations (28%)

###### **Employment Analysis**

Over the last few years the Cumberland Area has experienced major shifts in its economic base beginning with the decline in the textile industry. The region's economy is expected to continue moderate growth through the year 2010. The current State resources indicate an estimated growth of about 4,300 new job openings to the year 2010.

Due to this major shift from the textile industry, the economic development entities in our counties have been very aggressive in the recruitment of new industry. During the past year we have seen the gains of new employers and the expectation that others will locate in our area in the near future. The CWIA has positioned itself to be a partner in the recruitment of these employers.

The expected gain in new employers will call for a concerted effort of all partners to help fill the new job openings with skilled and employable workers.

###### **Job Skills Necessary**

Research indicates that the fastest growing occupations require higher basic, job specific, and soft skills than static occupations. Competitive jobseekers and incumbent workers will need skills in the following areas:

- Interpersonal skills that include getting along with others including co-workers, supervisors, and customers; working cooperatively with others, accept praise and criticism constructively; effectively get their point across through speaking and writing.

- Time management - the ability to self-manage one's own time, and the practiced skill of setting self-imposed goals, priorities and deadlines.
- Listening - skill in listening to and understanding work-related communication.
- Observation - skill in noticing details and in paying attention to instructions and demonstrations, such as safety procedure and quality control standards.
- Teamwork - skill in choosing behaviors and/or actions that simultaneously support team relations and lead toward the accomplishment of work tasks.
- Locating information - skill in using information presented in workplace graphics such as diagrams, floor plans, tables, forms, graphs, charts, and instrument gauges,
- Mathematics - Add, subtract, multiply, and divide all units of measure; perform the four operations with common fractions and decimals Compute ratio, rate, and percent; draw and interpret bar graphs, perform arithmetic operations involving all American monetary units.
- Applied Mathematics - applying mathematical reasoning to work-related problems, using methods of calculation that actually occur in the workplace.
- Reading for information - skill in reading and understanding work-related instructions and policies, including memos, bulletins, notices, letters, policy manuals, and government regulations.
- Writing - skill in writing work-related messages; composing written messages based on verbal information.
- Reasoning and Logic: Apply common sense understanding to carry out instructions furnished in written, oral, or diagrammatic form. Deal with problems involving several concrete variables in or from standardized situations.

### **Employer Findings:**

- There is a very tight labor market for qualified entry-level and skilled workers.
- Entry-level workers have a poor work ethic.
- There are escalating skill requirements for all jobs.
- Employers feel "on their own" in training and re-training their workforces.
- There is little knowledge about or use of the publicly funded employment and job training services available to employers.
- Workers skilled in trade and technology areas are highly sought.
- A strong work ethic is rated as the most important worker attribute, followed by communication and problem-solving skills.
- The number one skill most difficult to find among entry-level recruits is "work ethic".
- The number one skill most difficult to find among experienced recruits is "leadership".
- Top reason for rejecting job applications: "insufficient work experience".
- Top educational requirement for the next 5 years: "high school diploma or equivalent".

The employer information points out several challenges that have been addresses but have unfinished work to do in the Cumberland WIA that relate to the overall goals described in this plan. The One-Stop system must continue to refine its delivery of services and continue to improve employer knowledge of workforce sources and labor issues, and assist in improving the quality and quantity

of the workforce. The Cumberland workforce system must also be able to provide information to current and future job seekers regarding the skills needed for specific jobs, whether resulting from economic development efforts and/or jobs projected to be in demand. The Cumberland workforce development system likewise needs to be able to provide business and education with information regarding the skills needed for specific jobs, whether resulting from economic development efforts and/or jobs projected to be in demand.

In summation, workers must possess communication skills, critical thinking skills, group interaction skills, personal development skills, time management skills, team and technology system skills, leadership skills and employability skills, in addition to basic educational skills. With today's continued emphasis on technology, they must also understand technological innovations and related issues affecting their personal and professional lives. In order to assist employers in meeting their workforce needs, the CWIA will utilize the ACT WorkKeys and other competency-based tools. These assessments are scored on a set of established skill scales to provide an accurate, systematic way to measure workers' abilities and training needs.

**B. State the data source(s) used to project these employment opportunities.**

Data utilized in developing this analysis of the current and projected employment opportunities was obtained from the *Lake Cumberland Area Occupational Outlook to 2010* Workforce Kentucky Website, US Census 2000 and local economic development agencies.

**V. Overarching Local Strategies**

**Strategic Plan and Goals**

**1. Awareness**

Create a sense of urgency at the state and local level about importance of a competitive workforce, and assure that industry clusters, employers and workers know of the available workforce development support services.

**Goal 1:** Promote and create an understanding of the need for a skilled workforce.

**Strategies:**

Publish and promote a Cumberland Workforce Investment Area State of the workforce report.

Expand and enhance on present communications agenda.

- Speakers for Chamber of Commerce, Industrial Authorities, Civic Groups, Schools, etc.
- Increase media coverage of Workforce offerings, successes and current events.

Expand and enhance the Cumberland Workforce Network Web page to include more workforce related items..

- Work with all required partners and encourage and connect with new partners to integrate a web site with extensive workforce information.

**Goal 2:** Promote the Cumberland Workforce Investment Area Career Centers and its services to the business community.

**Strategies:**

Strengthen current marketing programs with continued support from all partners.

Promote a positive attitude toward the use of Career Centers. Use success stories of individuals and businesses as examples for others to see.

Recognize employers who support and use the Career Center. Explore methods that will bring recognition and highlight the successful partnerships of the Career Centers and the business community.

**2. Alignment**

Build a demand-driven system which clearly reflects the employment needs to industry clusters, know the status of the available labor pool, and promoted strategies to assure a competitive labor pool in terms of quality and quantity.

**Goal 1:** Align the Cumberland Workforce Investment Area services to meet and enhance business needs.

**Strategies:**

Explore the option of working with business clusters.

- Choose from known clusters in our area such as; health care, houseboat industry, gate manufacturing and explore and derive the feedback from these clusters to determine viability of a cluster concept from the businesses.
- Explore the creation of a forum of WIB members, one-stop partners, community college, technical schools and business leaders to discuss and promote the business cluster approach.

**Goal 2:** Enhance partnerships with non-traditional groups.

**Strategies:**

Continue to enhance our partnership with economic development groups, industrial authorities, rural development centers to bring a comprehensive outline of all services available to new and existing business.

Study and report to the Cumberland Workforce Investment Board the need and level of support new access points would be and the support it would be to businesses.

- Survey libraries, schools, etc.

**Goal 3:** Explore the partnership with Kentucky Adult Education to promote KEC/KMSSC as a component of a pre-hire initiative.

**Strategies:**

Establish an occupational profiling database to match potential employee workplace essential skills with needed employer workplace skills.

Increase the number of adult learners earning a KEC or KMSSC certificate.

Increase the number of employers giving preference to job seekers with KEC or KMSSC certificate.

Increase adult learners transitioning to post-secondary as a result of seeking KEC/KMSSC.

### **3. Access**

To look for and work to eliminate barriers which inhibit workers from getting the education/training needed to be employable, and employers from getting the quantity and quality of the workforce needed.

**Goal 1:** Identify and create solutions to barriers that affect the building of a quality workforce.

#### **Strategies:**

Enhance services such as; On-the-Job Training and Customized Training. Support the fact that businesses are the biggest source of training.

Explore and study methods to upgrade those that are underemployed.

Create a quick and simple method for employers to access valuable information that knocks down barriers to gaining needed assistance.

**Goal 2:** Connect with business to create the workforce that is required.

#### **Strategies:**

Attend or help create Human Resource Manager groups.

Attend meetings with Plant Managers or top management attendees.

### **4. Accountability**

Develop systems to measure and report the state/local impact of a workforce development system.

**Goal 1:** Development measurements and reporting mechanism that will assist the local WIB to manage and address present issues in the workforce.

#### **Strategies:**

Seek and select pertinent information that will assist the local WIA and business. Listed are examples of information that could be gathered.

- Web-site hits
- Visit to Career Centers and Affiliate Site
- Services that were used in the Career Center
- Number of businesses contacted
- Assemble needs of businesses
- Affect of marketing
- Chamber of Commerce visits
- Other civic group visits
- Services rendered to businesses
- Cost per participant

### **5. Internal Capacity Building Goals**

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**Goal 1:** Redirect the mission of the local WIB to instill the importance of meeting the needs of business and creating a quality workforce that will help attract new business and retrain.

**Strategies:**

Provide training for board members.

Explore avenues to best orientate new board members.

Study and recommend new agenda for board meetings to include more input from business sector.

## **VI. Integration of One-Stop Service Delivery**

**Integration:** The broad array of employment and training programs will be integrated into a single system that is accessible to the system's primary customers: the Cumberland's current and future workforce and the employers who depend on the availability of a competitive workforce. The integration of delivery systems will be assisted not only by co-location of partners but also by the use of automation technology to enable electronic linkage of services and aid customers in accessing appropriate services. Delivery systems will be built on collaborative efforts of State, and Local partners in order to provide comprehensive, non-duplicated service to customers in a seamless manner.

An important goal of the One-Stop System is to enable integration of the array of workforce preparation programs and services available to address the needs of the CWIA's job, education, and training seekers and employer communities. All customers should have access to a comprehensive array of seamless, integrated services.

Beyond the core services, Career Centers works to incorporate a broad array of other education, training, and supportive services. The One-Stop System through co-location or electronic connectivity offer services provided by Wagner-Peyser, Veterans Employment Services, Dislocated Workers, TAA (Trade), WIA Title I, Senior Community Service Employment (Title V of the Older Americans Act), services provided by Rehabilitation Act, Unemployment Insurance, Adult Education and Literacy, Community Services Block Grant, Carl D. Perkins Vocational Education, Job Corps, Migrant and Seasonal Farm Worker programs and WIA Youth Services. These programs are largely categorical in nature, each with different funding streams, rules and regulations, eligibility criteria, and other requirements. For this reason (in the absence of federal legislation to consolidate current programs and funding streams), integrating these programs has and will be a continued effort on the local and state levels.

### *Integration Strategies*

To foster integration of services and service delivery, the One-Stop System will use many mechanical processes. To a certain extent, the seamless, non-bureaucratic operations of the system and Centers will be achieved by pursuing integration strategies related to the common services the system will provide and the common functions necessary to provide them. Among those strategies are:

- Cross-training of all staff in the One-Stop System,
- Shared case management among Center partners,
- Shared job development,

- Common intake/assessment processes throughout the system,
- Locally standardized information and referral, and
- Shared administration among partner.

## VII. Service Delivery

### A. One Stop Service Delivery Strategies

#### 1. Describe the one-stop delivery system and the role of your local board in the system.

The Cumberland's WIB's one-stop delivery system under which entities responsible for administering separate workforce development programs and funding streams collaborate to create a seamless system of service delivery that will enhance access to workforce development services and improve employment outcomes for individuals seeking assistance. The CWIB recognizes that such a system will need to continually evolve to fully reach its full potential.

The Cumberland's WIA's One-Stop Career Center System includes four principles by which the One-Stop effort will be guided. These principles were adapted from the four broad outcomes for the One-Stop System as envisioned by the United States Congress in the Act and the DOL in its guiding principles. The CWIB's four principles are that the system will be *integrated* and *comprehensive*, and based on *customer focus* and *performance accountability*. These principles form the platform upon which the Cumberland's One-Stop System is built. Integrating programs and services into a comprehensive system, making the services universally available, increasing and facilitating accessibility to these services, making the system and its providers uniformly accountable, creating stronger partnerships, and bringing customers into the system as partners are the primary focus of the one-stop systems.

**Comprehensive:** The array of services will be sufficient to meet the employment and training needs of local customers including youth, long-term unemployed, economically disadvantaged, new entrants to the labor market, dislocated workers, skilled workers needing access to job listings or labor market information, and employers seeking information to meet their employment and training needs. The full array of services will be available to the system's customers and provided appropriately, depending on the level of need. Access methods will be geared to varied customer needs and levels of complexity.

**Customer Focus:** Service delivery will be information-based. Customers will be provided sufficient information and a menu of services to enable them to exercise an informed choice in regard to careers services they wish to pursue and how those services will be delivered. The System will also rely on customer feedback and satisfaction indicators as an indication of program effectiveness.

**Performance Based:** Accountability for achievement of performance outcome objectives, including a high degree of customer satisfaction, will rest with service providers. While cost will be a consideration in procurement of services, ability to achieve objectives is an absolute requirement. The CWIB will develop negotiated performance measures for all programs which will provide the basis for incentives and sanctions for the CWIA.

The Cumberland's Workforce Area One-Stop Career Center System consists of four Comprehensive Centers. One Career Center is located in Campbellsville at Elmhurst Plaza, 1311 E. Broadway, Campbellsville, KY 42718. The second is located in Somerset at 410 E. Mt. Vernon Street, Somerset, KY 42502. The third is located in Corbin at 310 Roy Kidd Avenue, Corbin, KY 40701.

The fourth is located in Russell Springs at 848 West Steve Wariner Drive, Russell Springs, KY 42642.

There are ten (10) affiliate sites which are located in every county in our area that does not have a career center located in it. These sites include a varied number of partners that are co-located with electronic connectivity to others.

The CWIB has established criteria to certify or charter One-Stop Career Centers and affiliate sites. Any new center of site must meet the requirements set forth by the CWIB. A physical inspection is performed with report and request being submitted to the CWIB for approval. The CWIB has sole authority in the establishment of career centers and affiliate sites.

The CWIB, thru use of incentive funds, have established Resource Rooms in the Career Centers. These resource rooms allow a job-seeker, UI Claimant or underemployed individual to access the resources that are available thru the partners. These resource rooms are handicap accessible, with computers available for their needs. Each affiliate site is equipped with extra computers that allow individuals to do job search, resumes, etc. by themselves. The CWIB is committed to maintaining these resource rooms which offer a wide array of services to a wide array of customers.

### ***Labor Market Information***

The Labor Market Information (LMI) for the CWIA was provided through contracts with ERISS Corp. The CWIB contracted for three separate surveys during the first five years of WIA services in the CWIA.

Due to the cost of maintaining a contract with ERISS, the CWIB has chosen to rely of other sources for LMI. The Workforce Kentucky Website is most often used. This website contains information on areas such as labor force, area profiles, employment projections, top 50 occupations, occupation explorer and income information. Many other features of this website are used to assist in gathering information to help economic development in recruitment of new business to our area.

### ***Customers***

The One-Stop Career Center System will be designed to serve two primary groups of customers: employers and job, education and training seekers. The employer customers include any employer or business that desires access to the information or services the One-Stop System has to offer. The job, education and training seeker customers include any person who wants the information or services the system has to offer.

The Cumberland Career Centers will provide services to customers in three levels or levels of service. Underscoring this design is the philosophy that many customers will find a job with minimal assistance. Customers often only need access to personal computers, fax machines, and useful information to assist in job search. Many employers need only to make their job openings known to find suitable applicants, or they want workforce information that is readily available. Therefore the Cumberland Career Centers will provide as much information as possible about jobs, getting jobs, and training for jobs to customers in a user-friendly format.

### ***Services Overview***

Customer choice is one of the basic design principles the CWIB has in its vision for the One-Stop System. Employment and training programs have traditionally been categorical in nature. Delivery of services has traditionally been from the top down, with the federal and state governments dictating

who provides service, which customers are served, how they are served, and what services are available.

The One-Stop vision, however, embraces a different philosophy, one which regards customers as true partners in the system rather than just end users. The CWIB will continually update evaluation of the workforce preparation needs of its communities and their customers then determine which services will fulfill those needs, and finally, how and by whom these services can best be provided. As a result, One-Stop customers will have a wide range of choice as to where and how they can access those services, and a high degree of self-determination and personal responsibility as to which services and providers they choose as well as the degree of staff assistance they require.

The CWIB will deliver core, intensive, and training services, and are committed to ensuring an environment which will support universality, accessibility, and customer choice.

#### *Job, Education and Training Seeker Services*

The first level of service or the **core services** are available to everyone. Core services consist primarily of self-assisted type services but also include light career counseling and other services provided by career center staff. The next level of service, **intensive services**, demand more staff time and provide customers with a greater depth of assistance. Intensive services are available to customers that have not been successful looking for a job on their own. **Training services** actually provide individuals with assistance in finding enrolling and paying for educational and occupational skills training. Training services are available to customers that have been through core and intensive services but have still not been able to secure a job. Following is a description of the three levels of service:

#### *Core services*

- Information on and orientation to all services available through the career center
- Information on employment opportunities and other labor market information
- information on required job skills
- Information on occupational skills training
- Information on basic skills training
- Information on local child care, transportation providers and other supportive services
- Information on unemployment insurance claim filing
- Outreach
- Recruiting recipients of unemployment insurance for job search assistance
- Internet access in resource rooms will provide access to lists of eligible training providers

Core services will be available to all customers at or through the One-Stop Career Center System. A primary goal of the Career Center System is to provide core services electronically in addition to providing services through staff assistance.

#### *Assisted Core services*

- Initial assessment
- Placement assistance
- Referral to jobs
- Job search assistance
- Assistance in accessing financial aid for training and education
- Eligibility and intake
- Assistance in determining eligibility for welfare-to-work activities
- Post-employment follow-up for career center customers that have received assistance

A career manager may determine that an individual customer should receive intensive services without first participating in self-directed job search. This determination must be based upon an interview with the customer and an initial assessment.

### *Intensive Services*

- Comprehensive assessment of skills and service needs
- Development of individual employment plan leading to economic self-sufficiency
- Group counseling
- Individual counseling and career planning
- Case management for customers wanting training services
- Job preparation counseling
- Out-of-area job search
- Supportive services such as child care and transportation
- Short term prevocational services
- Follow up

An individual who cannot find a job after receiving both core and intensive services may be referred to training services. The following criteria applies to individuals receiving training services:

- Must be unemployed or underemployed; and
- Receiving public assistance or considered low incomes or a dislocated worker; and
- Must receive an interview, initial assessment, case management, an individual employment plan, and a determination that they have the skills and qualifications to participate successfully in the selected training program.

### *Training Services*

- Referral to and payment of basic educational skills training.
- Referral to and payment of occupational skills training
- On-the-Job training
- Arrangement of customized training

If appropriate, a customer may be referred to training. Training services are provided to customers by training providers, not Cumberland Career Center operators. Training providers are reviewed, evaluated and approved by the Cumberland Workforce Investment Board, through Requests for Information, that places vendors on a list of eligible training providers after specific requirements have been met. This list is then submitted to DWS for review to be included on the statewide list of eligible providers of training services. Customers in conjunction with their career manager select a training provider from the Eligible Training Provider List to provide training in a particular occupation.

Occupational skills training is only provided in occupations that have a demonstrated demand for workers. In other words, career centers only spend training dollars to train people for jobs with real employment opportunities. The CWIA through various resources maintains a list of occupations that are considered to be in demand by employers, career managers and staff to use when working with customers in making training decisions.

### ***Job, Education, and Training Seeker Services***

The second major service component of the Cumberland Workforce System offers information and labor market services to the general public – specifically those individuals looking for jobs, labor

market information or education and job training opportunities anywhere in the region. A wide range of information and services will be available, including:

- labor market information;
- services matching individuals to jobs or to education and training services;
- career exploration and counseling;
- job search assistance;
- testing and assessment of individual needs;
- employability development planning; a personal counseling;
- a process to determine eligibility for federal and state-funded services;
- centralized case management for those receiving intensive services;
- a list of education and training providers and the programs they offer;
- information on the performance of local service providers;
- assistance identifying and accessing support services for those receiving long-term education and training;
- referral to appropriate education, training, and other labor market services;
- job placement assistance; and
- follow-up.

### *Service Levels and Access Routes*

Like employers, individuals seeking assistance will want different kinds of services, and they are likely to use the system in different ways. The workforce system must accommodate these differences by individualizing its services. The concept of levels of service is useful again to describe the delivery system for resident services.

**Level 1 Services.** The majority of individuals in the Cumberland Area contact the workforce system seeking information and readily available labor market services to help them find a job or make career-related decisions. For most, the information and services they will need in order to explore options and make better informed choices will be electronically available either through a variety of user-friendly self-help systems in their homes, schools, libraries, or through one of the Career Centers located throughout the region.

A wide range of basic labor market information is offered at this level. Individuals are able to get information on current job opportunities, identify rapidly growing industries and occupations in the area, and generate occupational profiles that describe the job and specify the education, skill, and experience requirements.

Those interested in further education and training will have access to career information as well as a list of all approved eligible training providers in the state that includes the programs they offer and their most recent performance data. In addition information on a number of labor market related services such as the location of approved child care facilities, public transportation and access points for social services. With this information in hand, those looking for immediate employment can review current openings listed in the job bank. Those recently unemployed can use the level 1 system to file their unemployment insurance claims and explore retraining options as well as look for jobs.

Most individuals served by the workforce system will use level 1 services but will not necessarily visit a career center. Whatever the point of access, no eligibility requirements is imposed. As is the case for employers, level 1 services and information are readily available to everyone.

**Level 2 Services.** A significant number of people have labor market, education, or training needs that cannot be adequately met with level 1 information and services. Most of these individuals are referred directly to one of the Career Centers, where professional staff will intervene in the service process. They augment the basic level 1 information and services with more intensive and personalized assistance. Additional level 2 services will include career exploration activities, career counseling, job search assistance, life skills, and job development and placement. In keeping with the workforce system's commitment to providing services first, staff members will address needs that must be resolved before an individual can focus on job search.

A similar level of services will be available to students making education and career-related decisions. These services will be customized to their special needs, i.e., placing more emphasis on career exploration and educational options and less on job search, and will be made available by supplementing counseling capabilities in the secondary schools or by providing students direct access to career centers.

**Level 3 Services.** Many of those having difficulties in school or in the labor market are not able to take advantage immediately of the information and services offered through levels 1 and 2 because their special needs are so great. Before they can function effectively in the mainstream economy, they need intensive developmental services, particularly basic education, long-term skills training, and an extensive orientation to the culture of work. Level 3 services are designed to address these needs. While only a few additional services are added at this level, they require financial investments to each individual served. Some may be able to access these services using their own resources but most will need some form of federal or state assistance to obtain the services they need.

Given this reality, the process for accessing level 3 services will differ from that of the other two levels. First, those individuals needing financial assistance will go through a single, comprehensive eligibility determination to identify potential funding for their education and training activities, including the support services necessary to allow them to participate in and complete a course of training. Next, they will undergo intensive testing of their basic skills, attitudes and interest and an in-depth assessment of their needs.

Career Center staff will use the results of the testing and assessment activities to develop a plan of action outlining the sequence of education and training as well as the mix of support services needed to make the individual employable. They will identify the resources required to implement the plan. This alone, giving customers the knowledge and resources to make informed decisions, will significantly increase the efficiency and effectiveness of the local delivery system by subjecting education and training providers in the region to market forces as they compete for customers.

Level 3 services will encompass more than education and skills training. Customers will have access to case management, receive an objective assessment of their interests and needs, be assigned a single career manager to monitor progress and to help navigate the list of training providers, and have access to follow-up services after they find jobs.

#### *Key Features of Job, Education and Training Seeker Services*

The workforce system proposed here features a single, integrated service delivery system and offers a seamless sequence of services customized to address customer needs. It has a number of other distinctive characteristics as well:

- Multiple points of contact but gives access to the same information and services regardless of where customers contact the system.

- Personal rather than an institutional approach to service delivery, giving first-time customers information or services rather than subjecting them to a processing activity.
- Single intake, testing, assessment, counseling, case management, and referral system for all developmental services in the local workforce area.
- Assessment of individual needs by an entity that has no vested interest in any of the local education and training providers.
- Commits dollars to individuals rather than to local training providers and helps individuals become effective consumers, thereby forcing training providers to compete with one another.

Another function of job, education, and training seeker services involve coordinating resources available for workforce development in the region. The Cumberland Area WIB is particularly interested in ensuring that adult basic education resources throughout the region are aligned to maximize resources, eliminate duplication, and ensure that all residents have access to services. The Board is also particularly interested in ensuring that Postsecondary and technology job training programs that are not part of programs that lead to licensing, certification, or an associate degree are aligned with the overall workforce development goals of the Cumberland Area.

The Board believes that job, education, and training seeker services, like employer services, are aggressively and creatively marketed to residents who might benefit from them. Marketing ensures that residents see the workforce development system as an integrated customer-driven system for lifelong learning and career development rather than a collection of uncoordinated programs.

## **2. How does the local board ensure continuous improvement of eligible providers of services?**

The CWIB has each eligible training provider to resubmit a subsequent eligibility form for each new program year. Although Kentucky received a waiver from the Department of Labor that allowed for data required on the application pertaining to performance not be required for the purpose of remaining on the state ETPL. The CWIB did receive subsequent eligibility forms from all providers that contained performance data. This data provided the CWIB with a tool to affirm that these providers were meeting performance guidelines that meets policies set forth by the CWIB. CWIB staff is prepared to meet with providers to insure that these forms and information are correctly prepared.

The CWIB staff works with providers to maintain an ETPL that has the current offerings of programs. This provides the participant and career management staff with correct and necessary information needed in planning career development. While training is connected to demand job occupations the participant has the choice of the provider that they wish to use. Having current information helps assist the participant in making an informed decision.

The CWIB and staff seek to find new providers that offer services to populations that are in need due to underlying circumstances. The CWIB is working to compliment its ETPL with providers that offer short-term training. Many out-of-school participants, adult and dislocated workers need only this type of training to enter or re-enter the workforce. This will allow a wider selection of occupational training programs to meet the demands of the employers in our area.

The CWIB asks and encourages training providers to be flexible with their current programs and the addition of new programs as demand from employers dictate. With the addition of new employment opportunities that requires skills not before needed by employers in our area, the provider must be fluid in their approach to program design.

The CWIB realizes that true continued improvement comes only from reacting and meeting the demands of our employers. Vigilant awareness of changes in structure of our workforce will drive the necessary changes and actions that are implemented by the CWIB.

**3. How does the local board ensure that providers meet the employment needs of local employers and participants?**

The CWIB and staff approves all training providers for the Eligible Training Provider List (ETPL). These providers serve both local training needs and are available to others through the State ETPL. Training providers may list all of their programs that they offer with actual participant training confined only to occupations that are in demand in our area or other areas if participant is willing to relocate.

The CWIB, through its business liaisons and other contacts, work with employers to determine the training needs of an employer. It is imperative that this information is then passed only to training providers. This can be accomplished by different means including: employer-training provider meetings, business liaison- provider meetings, or economic development- training provider meetings.

The CWIA staff and business liaisons will assist in arranging these meetings. An example of this is a meeting with three new employers in our area and the training providers who offered training that meets the need of these employers. The employers described the level of training that was necessary for employment. This in turn would allow the training providers an opportunity to change curriculum or courses to meet the needs of the employers.

The CWIB will encourage training providers to add new areas of training or review their current training. This flexibility of the training providers in addition to employers identifying their training needs are crucial in building the necessary workforce. The CWIB is committed, through its business services, to bring these two entities together to provide appropriate training that fulfills the needs of our employers, which in turn allows our participants with better opportunities for employment.

**B. Adults and Dislocated Workers**

**1. State the type of employment opportunities available in your area for the adult and dislocated worker population.**

Projected Job Openings in the Cumberland WIA as extracted from the Lake Cumberland Occupational Outlook to 2010. Job openings from 2000-2010.

Transportation and Material Moving Occupations	933
Sales and Related Occupations	917
Personal Care and Service Occupations	752
Healthcare Support Occupations	725
Healthcare Practitioners and Tech. Occupations	721

Office and Administrative Support Occupations	709
Construction and Extraction Occupations	682
Education, Training and Library Occupations	635

Occupations with the most annual job openings;

Sales and Related Occupations	256
Food Preparation and Serving Related Services	242
Office and Administrative Support	231
Transportation and Material Moving	203
Production Occupations	181
Education, Training and Library	94
Personal Care and Service	91
Building Grounds Cleaning and Maintenance	79

**2. Describe the type of training activities to be offered to meet these employment opportunities for the adult and dislocated worker population.**

The employment and training activities funded through the Cumberland Workforce Investment Board are an integral component of the Area’s education and training system . The Board has established a network of career centers and affiliate sites throughout the 13-county Workforce Investment Area which provide points of access to many education and training services in the region. Services are provided by a variety of workforce partners and are offered in levels of service with each consecutive level providing customers with more staff intensive services and require a large investment of training dollars. The primary decision criteria or gateway for moving customers to higher tiers of service is whether or not the customer is employed, and if so, does that job provide them with a “livable wage”. A good description of the services available in the Cumberland workforce system can be found in the One Stop Delivery System component of this plan.

With careful case management, Cumberland Career Center customers are matched with the services they need to find and keep jobs. The greatest resource investment occurs as customers move into the third tier of services or training services. Adult, non-dislocated worker customers receiving training services have specific, identifiable barriers that keep them from finding jobs, keeping jobs and earning an income above the poverty line. The barriers include the lack of a solid work history, no high school diploma, poor academic skills, not English literate, ex-offender, welfare recipient and homeless. Dislocated worker customers typically need a different set of services aimed at moving them quickly back into jobs. These customers may need some skills upgrading such as computers skills training and job search assistance. Dislocated worker services must be determined by staff on an individual basis. Many times the customer needs assistance in identifying skills they have acquired during their work experience that can be transferred to another occupation. Whether an adult or dislocated worker, Career Centers staff routinely discuss with customers opportunities in non-traditional occupations that may exist in the region.

The Cumberland WIB has established individual training account system (ITA) promoted under the Workforce Investment Act. Workforce Board staff will solicit qualified training providers through a Request for Information process and maintain a Board approved vendor list. The CWIA has both an Occupational Skill Training and an Intensive Services Training Provider List. The CWIB and LCADD manages a pool of training dollars that provides adult and dislocated worker customers with assistance in obtaining training. When appropriate, career center staff refer customers to approved training

providers and pay for tuition and fees through an established set of procedures. The CWIB and LCADD staff only solicit occupational skills training providers that offer training in demand occupations. Training for demand occupations in other Workforce Areas will be offered if a customer is willing to relocate or commute following such training.

Listed below is the training mix that is provided to Career Center customers identifying entry-level requirements and the barriers addressed by the training and average costs.

**Intensive Training** includes activities such as literacy, remedial or beginning instruction in reading, writing, mathematics, GED preparation, English as a Second Language for non-native speakers and other prerequisites for occupational skills training. Instruction may stand-alone or be part of a course of occupational skills training. Instruction may also occur sequentially or concurrently, depending upon the needs of participants. Basic education addresses:

<b>Barriers</b>	Lack of basic skills, specific individual barriers, at-risk status
<b>Population(s)</b>	Adults, dislocated workers
<b>Employer needs</b>	Communication skills, learning skills
<b>Entry requirements</b>	Core Services
<b>Attainment</b>	Specified in each individual's service plan: high school diploma or GED, specific level of functioning (literacy/ESL clients), youth basic skills competency certificate.
<b>Duration</b>	Average 10-12 weeks; as specified in individual service plan; participation may be prior to or concurrent with occupational skills training

**Occupational skills training** is provided through local public schools, private proprietary schools, and community colleges. Training is directed toward occupations for which there is a demonstrated demand for workers. Training is typically part of a regular course or program offered by the training institution.

<b>Barriers</b>	Lack of occupational skills, specific individual barriers
<b>Population(s)</b>	Adults, Dislocated Workers
<b>Employer needs</b>	Specific occupational skills
<b>Entry Requirements</b>	Basic skills at levels necessary for specific occupations; other requirements specific to occupation (health, etc.), plus core and intensive services
<b>Attainment</b>	Recognized certification of occupational skill attainment (certificate, associate degree, etc.)
<b>Duration</b>	Up to two years allowed

**On-the-job training** provides employer-specific training in both the public and private sector. OJT is appropriate for participants who may have some basic skills and some occupational skills but are deficient in meeting job specific requirements. It may also be appropriate for participants with multiple barriers when it may be provided upon completion of classroom instruction. All OJT activities are governed by policies established by the Cumberland Workforce Investment Board in compliance with all applicable statutory and regulatory requirements.

<b>Barriers</b>	Lack of specific occupational skills, poor work history, specific individual barriers.
<b>Population(s)</b>	Adults, Dislocated Workers
<b>Employer needs</b>	Occupational skills, work maturity
<b>Entry requirements</b>	Basic skills necessary to learn occupational skill, plus core and intensive services
<b>Attainment</b>	Successful completion of training period and continued employment in occupational area for which training was received
<b>Duration</b>	Up to 26 weeks; varies with individual training plan: level of participant's skills, time needed to train for occupation

**3. Describe the Individual Training Account (ITA) system and exceptions chosen for your area which are allowed in accordance with section 134(d)(4)(G)(ii) and 663.430.**

**Training Services**

- Referral to and payment of occupational skills training (career center establishes Individual Training Accounts to pay for training with the exception of OJT/Customized Training, Incumbent Worker Assistance Service and Special Populations);
- Referral to and arrangement of On-the-Job training;
- Arrangement of employed worker training; and

If appropriate, a customer may be referred to training. Training services are provided to customers by eligible training providers, not Cumberland's Career Center operators. Centers establish Individual Training Accounts (ITA) for customers in order to pay for training. Payments from ITAs may take place by several methods including electronic transfer of funds, vouchers, credits and other means. Training providers are approved by the Cumberland's Workforce Investment Board, through a request for information process, that places training providers on the Eligible Training Provider List (ETPL) after specific requirements have been met. Customers in conjunction with their career manager select a training vendor from the approved ETPL to provide training in a particular occupation.

Occupational skills training is only provided in occupations that have a demonstrated demand for workers. In other words, career centers only spend training dollars to train people for jobs with real employment opportunities. Annually, the CWIA identifies a list of occupations that are considered to be in demand by employers and provides access for career center staff to use when working with customers in making training decisions.

The CWIB solicits applications and collects information from providers that are granted eligibility determination for the state approved Eligible Training Provider List under WIA including Education Act of 1996 that lead to associate degrees, baccalaureate degrees and/or certificates; programs provided under the National Apprenticeship Act; and other training providers and as long as they make application as prescribed and provided their performance data meets Cumberland's WIB approval criteria.

The State has developed an application form that, at a minimum, collects the following information from providers: provider name, address and type of institution; contact name, phone number, fax

number, email address, course or program of study offered; diploma, degree, or certification granted; length of training, training program description, cost information, performance information including completion rates and placement rates over the past five years and entry requirements if any.

All training provider applications, that are HEA approved and have submitted the correct paperwork are approved by WIA staff and the remaining providers have to be brought before the WIB for approval. The providers are transmitted to the Division of Workforce Services upon request of updates.

On an annual basis, the CWIB and LCADD staff will reassess training provider eligibility. Subsequent applications are requested, if applications are not submitted they would be removed from the Eligible Training Provider List.

The Cumberland Workforce Investment Board will provide training services to individuals eligible for training funded under WIA through an individual training account (ITA) system. Customers that have not been able to find suitable employment, employment that leads to self-sufficiency, after receiving core and intensive services will have access to training services. The assessment process conducted by a career manager will identify the customer's interest, abilities and aptitudes. A career manager uses the assessment results and information gained through interviews to further identify the gap between where the customer is and where they want to be with regards to their employment goal. The customer and career manager jointly develop a strategy that will enable the customer to close the gap to achieve their employment goals.

The strategy may include basic skills or occupational skills training and part of that strategy session involves assessing the funding requirements that are needed to achieve the employment goal including money needed to pay for basic skills training, occupational skills training, transportation, child care or other support services. An ITA can be established for customers to assist with tuition and fees for training. An ITA represents the CWIA's obligation to pay a specific amount of money towards tuition, fees, books and supplies for training.

The Cumberland Workforce Investment Board has established a tiered approval structure for authorizing an ITA. Cumberland Career Centers career managers may establish an ITA per year for up to two years for an individual customer. If a customer needs more than \$5,000 per year for an ITA, a career manager must obtain approval from the CWIB. The intent is to provide career managers with a range for ITAs, up to \$3,500 for Adults and \$5,000 for Dislocated Workers, but also provide enough flexibility to serve customers with training needs that require a greater investment.

The Cumberland WIB's has established appropriate record keeping method to ensure that ITA levels are not exceeded and are consistent with provider application information.

### *On-the-Job Training and Customized Training*

**Federal Regulation § 663.430** Under what circumstances may mechanisms other than ITAs be used to provide training services?

(a) Contracts for services may be used instead of ITAs only when one of the following three exceptions applies:

(1) When the services provided are on-the-job training (OJT) or customized training;

Title I, Section 101 (8) Customized Training.--The term "customized training" means training-- (A) that is designed to meet the special requirements of an employer (including a group of employers); (B) that is conducted with a commitment by the employer to employ an individual on successful completion of the training; and c) for which the employer pays for not less than 50 percent of the cost of the training.

Title I, Section 101 (31) On-the-Job Training.--The term "on-the-job training" means training by an employer that is provided to a paid participant while engaged in productive work in a job that-- (A) provides knowledge or skills essential to the full and adequate performance of the job; (B) provides reimbursement to the employer of up to 50 percent of the wage rate of the participant, for the extraordinary costs of providing the training and additional supervision related to the training; and c) is limited in duration as appropriate to the occupation for which the participant is being trained, taking into account the content of the training, the work experience of the participant, and the service strategy of the participant, as appropriate.

Title I, Section 117 (h) On-the-Job Training or Customized Training Exception.--(1) In general.--Providers of on-the-job training or customized training shall not be subject to the requirements of subsections (a) through (e). (2) Collection and dissemination of information.--A one-stop operator in a local area shall collect such performance information from on-the-job training and customized training providers as the Governor may require, determine whether the providers meet such performance criteria as the Governor may require, and disseminate information identifying providers that meet the criteria as eligible providers, and the performance information, through the one-stop delivery system. Providers determined to meet the criteria shall be considered to be identified as eligible providers of training services.

The CWIB has established an OJT policy that will be a part of any contract of OJT services. The CWIB views the use of OJT's as a vital part of serving both the individual customer and the business community.

### *Special Populations*

**Federal Regulation § 663.430** Under what circumstances may mechanisms other than ITAs be used to provide training services?

(a)(3) When the Local Board determines that there is a training services program of demonstrated effectiveness offered in the area by a faith based organization (FBO), community-based organization (CBO) or another private organization to serve special participant populations that face multiple barriers to employment, as described in paragraph (b) of this section. The Local Board must develop criteria to be used in determining demonstrated effectiveness, particularly as it applies to the special participant population to be served. The criteria may include:

1. Financial stability of the organization;
2. Measures appropriate to the program including program completion rate; attainment of skills, certificates or degrees the program is designed to provide; placement after training in unsubsidized employment; and retention in employment; and

3. How the specific program relates to the workforce investment needs identified in the local plan.

(b) Under paragraph (a)(3), special participant populations that face multiple barriers to employment are populations of low-income individuals that are included in one or more of the following categories:

1. Individuals with substantial language or cultural barriers;
2. Offenders;
3. Homeless individuals; and
4. Other hard-to-serve populations as defined by the Governor.

### *Special Projects and Demonstration Projects*

The Cumberland Workforce Investment Board will solicit creative proposals to provide unique approaches in serving customer groups with unique needs in our region. Special projects include the following: (1) projects that serve a particular target customer group or special population such as TANF recipients, pregnant or parenting teens, offenders or homeless individuals; (2) projects that use creative or innovative approaches to serving particular target customer groups such as a demonstration project. The services provided to customers through a special or demonstration project include the workforce services listed above. The nature of the project will determine what services are provided to project customers. Proposers should be aware of any special requirements that apply to individuals who are provided services through a specific funding stream. For example under WIA, customers considered a special population must be low income and either be an individual with a language/cultural barrier, an offender, homeless or from a hard-to-serve population. Proposers are allowed, and in fact encouraged, to fund projects through more than one funding stream.

## **C. Rapid Response**

### **Local Board Coordination with State Rapid Response**

**Describe how the Local Board will coordinate local activities with statewide rapid response activities.**

The Cumberland Workforce Investment Local Area Rapid Response (LARR) team responds to all layoffs and closures in our 13 counties and 4 One Stops. The LARR team started responding to all layoffs and closures in our area on January 1, 2007. The LARR team consist of three local Workforce Investment Area specialists and three local Office of Employment and Training certified specialists. There is one lead Local Area Rapid Response Coordinator (LARRC) and an assistant Local Area Rapid Response Coordinator (LARRC).

The Cumberland LARR area is divided in three commuting areas depending on where the rapid response is located. In the event a representative cannot cover their specified area the next closest representative will be available to cover their area.

When a member of the team receives the WARN letter of information regarding a layoff or closure they will ensure all team members for that area and the LARRC is aware of this. A team member will contact the employer to gather information and explain the services that are available to the employer

to determine if they are Trade impacted and if an employer meeting is needed. A team member will set up the employer meeting and design an effective and efficient plan based on the specific needs of the employer and employees. If a joint employer meeting is needed a team member will set up an employer meeting at the employers convenience and notify the LARRC. The LARRC will notify the state agencies and other team members of the employer and employee meetings. A member of the team will notify the local partners and other needed agencies. All team members are knowledgeable in all of the partners services in the event a partner is not able to attend the meeting the partners services will be explained.

The employer meeting consists of explaining services that are available and determining if any customized services or additional accommodations will be needed. During this meeting the team member will determine if it is a Trade affected company and the petition status. If it is determined to be Trade affected assistance will be given if needed with the filing of the petition and Trade information will be included in the employee meeting. A rapid response is scheduled for the employees at their convenience during the employer meeting.

Based on the employer meeting the employee meeting is customized and tailored for any additional accommodations needed and ensures the company's needs are exceeded by inviting the appropriate partners and needed agencies. The LARR team ensures all appropriate partners are there and if not they will be prepared to explain their services. The LARR team facilitates the customized employee meeting with an introduction of the rapid response meeting and resource materials are distributed. The facilitator introduces each partner and the partner distributes any additional material and explains their services. After each partners presentation the employees are given the opportunity to ask any questions they have concerning these services. The focus is reemployment and to get the employees back into the workforce by assessing their current marketable and transferable skills and education levels to obtain employment at a comparable wage.

After the meetings employer and employee surveys are distributed to complete. The employers are instructed to forward their survey to the Division of Workforce and Employment Services. The LARRC compiles the employees surveys and forwards to the state rapid response.

A LARR team member will maintain contact with the employer to provide the most efficient and effective service possible specifically with follow up correspondence one week prior to the dislocation date and forward any needed information to the LARRC. The LARRC will update the company information in EKOS after all meetings are complete. The LARRC will also complete the RR-50 and submit electronically to the state rapid response and enter the company information in EKOS. The LARRC will also close the company file and forward all appropriate information and any issues which may have developed while assisting the company to the state rapid response. Employees are registered in EKOS.

If affected workers are in another LWIA the LARRC will notify staff members of OET and WIA in the other local workforce investment area of the employee meeting to collaborate services in our areas.

The Cumberland's WIA local area rapid response team members and partners possess the operational knowledge of programs and services and strive to provide seamless rapid response at a time when joint efforts are crucial to affected employer and employees in our area.

## **D. Youth**

### **1. State the type and availability of activities for youth in your area.**

The Cumberland Workforce Investment Board provides both in-school and out-of-school youth with services funded under WIA on a year-round basis with a focus on working with out-of school youth by spending a minimum of 30% of WIA youth money on this target group. Services offered to youth will include the core and intensive services and the following: work experience and academic enrichment activities during the summer months; tutoring classes, adult mentoring and study skills training for youth that may be falling behind in their studies; GED preparation classes and assistance with GED fees for out-of-school youth with; placement assistance for those youth that want a job; remedial classes for those youth that are at-risk of dropping out of secondary school; occupational skills training for older youth; internships and job shadowing experiences; and follow-up services for a minimum of 12 months after completing the activities outlined in a customer's service strategy.

All activities provided to youth whether in-school or out-of school, will be available to persons with disabilities. The workforce Board maintains a strict policy to make every effort to accommodate any special needs of persons with disabilities including physical and learning disabilities.

The Cumberland Workforce Investment Board will appoint the Youth Council required under Section 117 (h) of WIA.. Duties of the Youth Council will include:

- Developing the portion of the local plan that relates to eligible youth.;
- Recommend eligible providers of youth activities;
- Conducting oversight with respect to eligible providers of youth activities;
- Coordinating youth activities under section 129; and
- Other duties as determined to be appropriate by the chair of the local board.

Youth activities have many similarities to those allowed for Adults and Dislocated Workers, tracked through its own funding stream. Youth 18 – 21 may be co-enrolled in youth and adult services when this mix of services most enhances the client's ability to complete their education and obtain self-sufficient employment. Career Center staff will decide when such co-enrollment is necessary and/or desirable, following Board policy.

When Youth activities involve training, service providers will be contracted to provide such training.

The appropriate procurement procedures will be in compliance with the Kentucky's Model procurement Code guidelines. Whenever possible, such providers will be utilized within the Workforce Area. Strong linkages with Area proprietary and alternative learning centers will be developed.

Linkages with employers and business organizations will be developed to provide some of the youth activities' elements, including area Chambers of Commerce. Close coordination with WIA One-Stop partners is also critical to youth activities.

As with the Adult and Dislocated Workers activities, all activities will be accessible to individuals with disabilities (with or without accommodation), training activities will be related to demand occupations, and non-traditional training will be gender less.

The following activities are available for youth in the Cumberland Workforce Investment Area:

- Preparation for post-secondary educational opportunities – This may include GED preparation at an adult learning provider and testing. Strong linkages between academic and occupational learning;
- Preparation for unsubsidized employment opportunities, in appropriate cases- including pre-vocational training in work skills, budget and financial counseling etc.;
- Effective linkages with intermediaries with strong employer connections to the job market and local and regional employers- through job development efforts of the Centers;
- Tutoring, study skills training, and instruction leading to completion of secondary school, including dropout prevention strategies;
- Alternative secondary school services, as appropriate;
- Summer employment opportunities that are directly linked to academic and occupational learning-to be determined by the Board in reference to summer program activities and funding;
- As appropriate, paid and unpaid work experience, including internships and job shadowing;
- Occupational skill training, as appropriate-with procured and certified training providers;
- Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors during non-school hours, as appropriate;
- Supportive Services – from most appropriate categorical program;
- Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months-in coordination with employers and business organizations;
- Follow-up services for not less than 12 months after the completion of participation as appropriate-through case management staff and automated state systems;
- Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral as appropriate-on a contracted basis with qualified professionals;

**2. Identify the Youth population (by age group) and the process you utilized in determining the population to be served. Describe the type of activities to be offered to the youth.**

Specific activities to be made available to youth in the Cumberland Area will be determined by the Cumberland Workforce Investment Board from Youth Council recommendations.

The Youth Council, as designated by the Board, will provide their expertise in advising the Cumberland WIB on recommended methods and policy development and adoption of youth strategies for this region.

Both in-school and out-of-school youth upon meeting required eligibility will be assessed and an individual plan of needs will be implemented. Youth will be tested for literacy as well as career and interest assessment at time of eligibility and again for literacy upgrade after completion of planned program.

All youth will be offered and subjected to core elements of WIA program. Through the procurement process providers will make available elements as well as strong emphasis on occupational skills training to each individual.

In-school youth will work on defined literacy deficiencies, work readiness, soft skills and some degree of occupational skills through vocational programs. Work experience can be provided in summer months.

Out-of-School youth will work towards attaining a GED or upgrade in literacy, work readiness, soft skills and will get occupational training leading to a certificate. Also, Kentucky Employability Certificate will be in their resume. Work experience will be offered for on the job work experience.

### **E. Business Services**

Business services are the lead component of the Cumberland's workforce system. Through these services the CWIA will market a wide range of information and services to employers throughout the region, including:

- general economic and labor market information;
- testing skill levels, interests, and aptitudes of incumbent workers;
- education and skill training of incumbent workers;
- wage and salary information for the region;
- recruiting, testing, screening, and referring qualified applicants for current or projected job openings;
- education and training for new workers; and
- information and technical assistance on federal and state rules and regulations affecting employment.
- on-the-job training.

#### The Business Services Team

The Business Services Team is responsible for gathering, analyzing, and verifying statistical information on the regional labor market; surveying employers to identify their needs for labor market information and workforce services; determining the kinds of information and services to be provided; developing and disseminating information on the available services to employers throughout the region; responding to employers' requests and providing the appropriate services in a timely and effective fashion; marketing services directly to employers in targeted industries or clusters; communicating labor market information back to the job, education and training seeker services part of the workforce system; and ensuring that employers throughout the region receive high-quality information and services.

The business services team is comprised of Business Liaisons, who will work directly with employers throughout the region to address their labor market information and workforce service needs and will actively market the workforce system's services to employers in those industry groups targeted for special attention. As the primary point of contact, the Business Liaison will be responsible for developing effective working relationships with local employers by providing quality information and services that enhance the employer's ability to achieve business objectives.

The Cumberland's approach is built on effective labor market relationships with employers based on economic rather than social welfare objectives. Local employment and training programs traditionally use a variety of job development and placement strategies to entice employers to hire their participants. They offer wage subsidies, promise tax credits, and appeal to employers' sense of social

responsibility in their efforts to find jobs for the populations they serve.

Under the Cumberland approach, employers drive the workforce systems and determine the services it offers. The Business Liaisons will develop working relationship with local employers based on their ability to market and deliver high-quality human resources services and training services that directly contribute to employers' business strategies and goals.

These relationships will serve as effective mechanisms for meeting employers' needs and providing access to quality jobs, training, and other labor market services for individuals using the career centers.

### *Access to Information and Services*

Local employers will have other options for accessing information and services from the workforce system. Employers throughout the region will have electronic access to information and a basic set of labor market services. For example, they will be able to review local wage and salary information, access employee assessment tools get the latest information on the education and skill levels of the local workforce, list job openings, search job banks, and solicit applications from job seekers without leaving their offices. Those without computer access will be able to access similar information and services by calling from a telephone, contacting the Business Liaisons directly, or walking into a career center. Most important, regardless of how or where they contact the workforce system employers will receive the same information and have access to the same set of labor market services.

**Marketing of business services.** Marketing this system is a critical piece of establishing a new relationship with employers. The business services team will be responsible for a marketing plan which makes employers aware of services available through the workforce system. This plan uses a variety of approaches to acquaint employers with services and to promote the system, such as speaking to Chamber's of Commerce and other business related entities, Regional Job Fairs and promotional materials.

### *Service Levels*

Though employers throughout the region will have equal access to the same information and services, each will have different interests and needs and will use the system in different ways. Recognizing this, the workforce system will customize its services to individual employers and industry groups. The Business Liaisons will accomplish this by offering services at different levels.

**Level 1 Services.** The vast majority of employers in the region will most frequently contact the workforce system to get general labor market information and make use of basic labor market services such as listing job opening and soliciting referrals. While they may go through the career centers or use one of the other affiliate sites, employers will be able to access these kinds of services through self-help systems that rely heavily on electronic access through a website to provide requested information and services. No staff resources will be required.

**Level 2 Services.** Some employers will be interested in more specialized information and intensive services than generally available through the self-help system. They may prefer receiving level 1 services from an individual rather than a machine. They may want the Business Liaison members to perform some of their regular personnel functions, such as testing current workers; testing and

screening job applicants; or providing out-placement assistance. Other employers may want special wage and salary surveys or other information not regularly available to all employers in the Area.

Interested employers will have initial access to level 2 services through the same avenues they use for level 1. Their needs for specialized services will quickly lead them to the Business Liaison.

**Level 3 Services.** An unique set of highly intensive labor market services will be offered to employers in rapidly growing industries in the region with verifiable current or projected labor shortages in high-skill, high-wage occupations that can best be filled through education and skills training. In addition to all of the level I and level 2 services, employers will have access to education and skills training for their incumbent workers and task analysis, and assistance developing education and skills training programs for new workers in those occupational areas where they are experiencing labor shortages.

The Business Liaison will target employers for these more intensive services using the latest information on regional labor shortages, including statistical data, interviews with employer associations and local economic development groups, and surveys of individual employers. It will gain access to these employers by providing high-quality level 1 and level 2 services and through aggressive marketing efforts.

When a need for intensive, long-term skills training is identified within an industry, employers will be encouraged to work together to design the training and oversee its delivery. They will be encouraged to collaborate in setting educational competencies, skills standards, curriculum specifications and certification requirements for each occupational area selected for training. This approach, which recognizes employers as the primary customers of the workforce system, makes them active participants of the beginning of the process.

The business services concept was established to include all partners, plus non-traditional partners. Business services activities carried out by other programs, such as job development, training assistance, and information, will be linked to this business services team to create a single unit working with the Area's employers.

#### **F. Innovative Service Delivery Strategies**

The focus on self-service and the need to serve a larger population through the One-Stop System has led, in part, to a very different approach to service delivery. This new approach might be depicted by an inverted pyramid. This strategy includes:

- Emphasis on multiple entry points, both physical and electronic;
- Emphasis on self-service and group activities, although staff assistance will be available for those who require it;
- Assurance that some "threshold" level of core service, for example, labor market and career information will be universally available; and
- Provision of one-on-one staff assistance for those customers who need intensive services, such as career counseling, remedial education, occupational training, or support services.

#### *Accessibility to Services*

Career Center services will be easily accessible for every potential customer in the CWIA. The CWIB

wanted to minimize the effects of remoteness, lack of transportation, or scheduling conflicts. Further, the Board recognized that in the current environment of shrinking resources and growing demand, the system would have to provide better service to more people with fewer staff. Self-directed service, through electronic access, is one of the strategies by which this can be accomplished.

The CWIA promotes integration of service delivery and aid to customers in accessing a full array of services. The Career Center System will provide ease of customer access to information relevant to education, skills training, and labor market options. CWIB strives to make sure that any access point a customer visits or uses will provide the same quality and degree of service. This system will allow access to information and services for job, education and training seekers, as well as employers. The system will also provide accommodation to persons with disabilities, including physically accessible facilities and adaptive equipment/technology, and support services such as interpreters and readers.

The CWIB, in connection with its partners has focused on making all centers and affiliate sites handicap accessible. Through the use of incentive funds areas of concern have been addressed. The CWIB shall continue to monitor accessibility. The CWIB has a goal of continued accessibility for all to receive services.

### **G. Strategies for Faith-based and Community-based Organizations**

The Cumberland Workforce Investment Area is a large region with many customers that have differing and unique needs. The CWIB realizes that many times faith based and community-based organizations are the best conduit between the workforce services funded by the Board and the customers. Faith based and Community-based organizations are often in a unique position to access special target populations with multiple barriers to employment including homeless individuals, ex-offenders, pregnant or parenting youth, individuals with disabilities, welfare recipients and individuals with poor literacy skills.

However, with the CWIB being rural in nature the access to faith-based and community-based organizations is limited. The main strategy of the CWIB is to continue to search for new or unknown existing organizations and form partnerships to serve our area.

## **VIII. Local Administration**

### **1. Identify the fiscal agent, or the entity responsible for the disbursement of grant funds.**

The Cumberland Chief Elected Official, in agreement with the Area Local Elected Officials, have selected the Lake Cumberland Area Development District (LCADD) to serve as grant sub-recipient/fiscal agent for WIA resources. Experienced LCADD staff delivers planning, evaluation, fiscal, procurement, monitoring, and management information systems services to administer programs of the Cumberland Workforce Investment Area in accordance with its strategic and operational plans. LCADD is the Cumberland Workforce Area's grant recipient and management agency for Workforce Investment Act, funds. LCADD, like the Cumberland Board, is precluded from providing WIA workforce education or training services.

The LCADD's Workforce Investment Act responsibilities are listed below.

- Refer individuals to one-stop partners for appropriate services and activities;

- Determine whether providers meet the performance criteria;
- In conjunction with the CWIB and Cumberland One-Stop Operators, develop and refine the workforce investment system during the year;
- Regularly provide recommendations to the WIB regarding updates to the One-Stop MOU;
- Continue an active staff cross-training strategy for partner staff on workforce investment activities and services;
- Coordinate and oversee use of WIA resources in the One-Stop Center;
- Will assist WIB in determining priority for training among those who are in need;
- Will provide supportive services;
- Will act as the Cumberland WIA fiscal agent for WIA Title I resources allocated to the Cumberland Workforce Investment Area.

In addition to these functions the LCADD will assist the CWIB and CLEO in establishing and maintaining the following Cumberland Council:

- Youth Council - to be established in compliance with the Workforce Investment Act and State Policy
  2. **Describe the competitive process to be used to award grants and contracts for activities carried out under Title I of WIA. Include the process for the procurement of training services provided outside the ITA process (section 134(d)(4)(G).**

The Cumberland Area has adopted Kentucky’s prescribed and implemented procurement standards that are in accordance with Section 184(a)(3) of the Act. Section 184(a)(3) requires states, local areas and providers receiving funds under this Act to comply with the Uniform Administrative Requirements as promulgated in circulars or rules by the Office of Management and Budget. The Uniform Administrative Requirements, codified by the Department of Labor in 29 CFR Part 97, provides the standards and procedures for procurement of goods and services in Section 97.36, *Procurement*.

The administrative regulation 29 CFR 97.36(a), reads as follows: “When procuring property and services under a grant, a State will follow the same policies and procedures it uses for procurement from its non-federal funds.” The Commonwealth of Kentucky uses the provisions of the *Kentucky Model Procurement Code* [Kentucky Revised Statutes (KRS), Chapter 45A.345 - 45A.460] for the procurement of all goods and services by state agencies. These methods for awarding contracts are contained within the Model Procurement Code:

- Competitive sealed bidding;
- Competitive negotiation;
- Noncompetitive negotiation;
- Small purchase procedures; and
- Responsibilities of bidders and offerors.

Service providers are selected through a competitive negotiation procurement that incorporates formal requests for proposals and answers. The process complies with requirements in the Kentucky Model Procurement code, and LCADD’s procurement policies. Notices of requests for proposals are published in area newspapers. A memo is mailed to the Workforce Board’s bidders list providing information on the scope of the RFP and describing the process for obtaining a copies of the RFP

document. Copies of request for proposal documents are mailed to all individual and organizations that request it.

LCADD staff schedule at least one bidder's conference in order to provide proposers with basic information on the RFP and allow them to ask questions. Staff answer questions and list the Q&A on CWIA web site for individuals and organizations that have requested a copy of the RFP, as well as posing the Q&A to the website. Proposers are usually allowed four to six weeks to complete and submit a response.

Review criteria are discussed in the Request and a copy of the review instrument is included in the RFP document. Primary consideration in selecting organizations to deliver services is the effectiveness of an organization in delivering comparable or related services based on demonstrated performance in meeting planned project goals, cost, quality of training, characteristics of participants and demonstrated ability in making available appropriate supportive services.

Awards are made to organizations that demonstrate an ability to perform successfully under terms and conditions described in the Board's requests for proposals. Determination of ability takes into consideration whether an organization has: (1) adequate financial resources or ability to obtain them, (2) ability to meet program design specifications at reasonable costs and to meet performance goals, (3) satisfactory record of past performance in providing services, (4) ability

to provide services which can lead to achievement of competency standards, (5) satisfactory record of integrity, business ethics, and fiscal accountability, (6) necessary organization, experience, accounting and operational controls and (7) technical skills to perform required work.

All proposals are evaluated and rated on the following criteria: (1) demonstrated need for services offered, (2) quality of approach to providing services, (3) demonstrated prior effectiveness in providing services, (4) meets program design requirements, and (5) cost. All proposals go through a four-stage review and approval process which includes: (1) review by LCADD staff members, (2) review by designated review committee (3) review by Youth Council for youth contracts (4) review and approval by the Cumberland Workforce Investment Board.

The Workforce Board uses the same competitive procurement process to select organizations that will provide training outside of the individual Training Account process. These circumstances are limited to providing, operating a special project or operating a demonstration project that serves special population.

The services provided by OJT contracts are substantially different than those provided by an approved training provider in that the OJT contract primarily serves customers in need of OJT services and employers willing to provide the training. In other words, the ITA process does not work well when providing OJT services.

The Cumberland Workforce Area is a thirteen-county region with many customers that have differing and unique needs. The Workforce Board realizes that many times community-based organizations are the best conduit between the workforce services funded by the Board and the customers. Community-based organizations are often in a unique position to access special target populations with multiple barriers to employment including homeless individuals, ex-offenders, pregnant or parenting youth,

individuals with disabilities, non-English speaking individuals, welfare recipients and individuals with poor literacy skills.

The Workforce Board plans to procure contractors to provide workforce educational and training services to these special populations through special or demonstration projects. Special projects typically serve a population with unique needs whereas a demonstration project provides an innovative approach to servicing a special population. The Board is very interested in testing creative and innovative approaches to providing services to populations that have traditionally been hard to serve.

**3. If funding is insufficient to serve all public assistance and low income individuals, describe the process to be used to develop a priority system to select the specific individuals to be served.**

The Cumberland's WIB has determined that if a shortage of adult resources in the local area, priority in the use of training service funds will be directed towards low-income individuals and public assistance recipients, as indicated in the state plan, with the exception of funds reserved for dislocated workers. The basis of the determination was a review of available Food Stamp and TANF resources, the targeted population that they serve, and the history of participation.

**4. Describe the priority system developed for use by the one-stop operator.**

1. Career Center staff will document priority criteria information on each individual at the point of registration, this will be documented in the Cumberland's Registration for Services Form. Once it is determined that a customer meets one of the four priority criteria it is to be indicated in the counseling notes.

2. If the Cumberland's WIB determines that training service funds will be directed toward those customers with indicators of lower employability, the Priority criteria are as indicated below:

Priority 1 : Public assistance recipients of KTAP/Cash Assistance, Food Stamps; those customers who meet this criteria will proceed to training services;

Priority 2 : Low income, defined as 70% of the lower living standard income level (LLSIL), homeless, public assistance recipients of housing assistance, medical cards, SSI/SSDI; those customers who meet this criteria will be placed on a Training Service List until all Priority #1 customers have been entered into a training service;

Priority 3 : Unemployed individuals who are not at a level of self sufficiency (defined as 150% of the LLSIL); those customers who meet this criteria will be placed on a Training Service List until all Priority #1 and #2 customers have been entered into a training service;

Priority 4 : Other individuals who are at or below LLSIL who require assistance to obtain employment leading to self sufficiency; those customers who meet this criteria will be placed on a Training Service List until all Priority #1, #2, and #3 customers have been entered into a training service;

3. Cumberland's Career Center staff will document priority criteria information on each individual at the point of registration. This information will be used as a part of the determination of

eligibility for training services. The process for implementing the priority system is operationalized in the **Cumberlands Workforce System Guidelines: Gateways to Enter Intensive and Training Services**, (expected below). Priority criteria may be re-assessed at a customer's request or at the discretion of the Career Center staff working with the individual.

4. The Cumberlands WIB has determined that the LWIA will not utilize this Priority Policy to determine eligibility for training services at this time. The Policy will be reviewed when 50% of adult WIA funding has been obligated. At that point the Board will review the available data and make a determination as to whether one or more of the Priorities must take precedence. The Board does not believe that it has adequate information regarding the number of potentially eligible candidates – with or without the priorities – who may apply for training services, to exclude eligible customers from need.
  5. If 50% of adult training funds are not obligated by the end of the fiscal year the Cumberlands WIB will review the data and update or re-authorize this Priority Policy. The Priority Policy will be reviewed by appropriate committee no less than annually.
- 5. Each LWIA must conduct regular oversight and monitoring of the activities of contractors and subrecipients at a minimum of one (1) on-site visit per program year.**
- A. Describe the LWIA monitoring system of recipients and subrecipients and all grants awarded and funds expended under WIA title I to determine compliance with the Act and regulations.**

The Cumberlands Area will monitor the activities of all contractors and subrecipients to ensure compliance with the Act, federal regulations, state policies, procurement standards, policies and procedures of the Cumberlands Area, cost categories and limitations, program quality and outcomes, performance and participant eligibility.

Monitoring will include periodic desk-top reviews of each contract and at least one on-site visit during each program year. On-site monitoring will take place approximately mid-point during the program year and may occur more than once at any time during the program year. A written report of the results of the monitoring will be prepared and distributed to the service provider within 60 days of the date of the visit. The monitoring report will specify any corrective actions required and an appropriate time frame for the provider to furnish evidence that the corrective action has been taken.

### **Program and Contractor Performance**

The Cumberlands Workforce Investment Board is provided regular reports concerning the performance and operation of the CWIA's workforce related programs and contractors. These reports include:

- Reports on program performance against plan, expenditures and applicable performance standards and goals as well as required reports from the separate funding streams and review LCADD's monitoring self-evaluation.

- Summaries of individual contractor monitoring reports, including corrective actions taken to resolve problems; and
- When requested, the contractor audit information.

The Cumberland Workforce Investment Board is responsible for coordinating service delivery in the thirteen county Cumberland Area to ensure that the greatest number possible of participants are served in workforce related programs.

The LCADD has been designated as the fiscal agent to monitor the operation of services funded under the Workforce Investment Act, and any other workforce related federally funded projects. This monitoring activity contributes to the goal to develop a state/local strategic planning, evaluation and accountability for the State's workforce development programs and activities.

Staff members assigned to the LCADD Workforce Development Department, other LCADD staff members such as; accounting staff and contracted service staff will carry out program and financial monitoring activities. LCADD's Executive Director will allocate resources to the monitoring function as he determines necessary and reasonable to meet requirements as established by the Cumberland Workforce Investment Board and the rules and regulations of each program administered.

All workforce development monitoring activities will be carried out through the direction of the CWIB and the Workforce Development Director.

### **Purpose**

The purpose of oversight and monitoring is to determine if the Cumberland Workforce Investment Board's program contractors are operating in compliance with all applicable laws, state and federal regulations and the CWIB Policies and Procedures. Both financial and programmatic compliance must be evaluated to a periodic basis. Process and results of monitoring will be used by the Workforce Board to determine the consistency of program performance against contractual program goals. This information will be used by LCADD staff members and the Cumberland Workforce Investment Board to analyze program performance to determine current and future program funding.

### **Oversight**

The Cumberland Workforce Investment Board conducts oversight of the Workforce related programs. The CWIB reviews operations of all workforce related programs under their authority. This includes a specific review of all program and contractor performance. Written reports are provided outlining performance, operation and monitoring of all workforce related programs. The board, in turn, use this information in their decision making process in program procurement, changing program direction and in requiring corrective action to resolve problems.

The CWIB performs its oversight as a whole and does not delegate these responsibilities to any committee of the Board.

- 1. Describe how the LWIA determines, through on-site monitoring, that expenditures have been made against cost categories and within cost limitations specified in the Act and the regulations and contract/agreement.**

The Cumberland Workforce Area will perform on-site and desk-top review of financial reports, invoices, and a budget/expenditure analysis will be conducted to determine the accuracy of expenditures by cost category, cost limitations, and in compliance with the contractual agreement, OMB Circulars and the Act.

**2. Describe how the LWIA determines compliance with program and other provisions of the Act, regulations, or contract/agreement.**

On-site and desk-top reviews of program activities and performance will be conducted to analyze program reports. Participant and program staff interviews will be conducted to determine compliance with the Act, regulations, and contract/agreement. If corrective action is required the contractor/sub-recipient must prepare a corrective action plan detailing the action to be taken. A follow-up contact will be conducted to ensure implementation of corrective measures.

Desk top monitoring consists of reviewing reports, invoices, backup documentation, forms, contract amendments and other information received from contractors and field offices, and the internal reports generated by MIS, Accounting, and other administrative staff. Review of these reports may reveal the need for technical assistance, on-site monitoring or require corrective action. On-site monitoring utilizes a contract specific monitoring tool for a monitor to survey documentation of service operations, interview customers and staff, review policies and examine procedures. Further detail is provided under **Monitoring Plan** in this section.

**3. Describe how the LWIA determines whether technical assistance is required and appropriate.**

The need for technical assistance is determined through on-site monitoring visits and desktop monitoring performed by MIS, Accounting department and program monitor. The monitoring consists of reviewing invoices, and other information received from contractors and field offices and the internal reports generated by MIS, Accounting and program monitor.

Technical assistance will be provided by the LCADD or the Division of Workforce Services staff. Technical assistance is viewed as a preventive mechanism and will be provided on an as-needed basis.

Needs assessment is an important mechanism to determine the level and type of technical assistance needed. Area surveys and monitoring results will be utilized to determine the need for strategic intervention and capacity building opportunities. This issue is further discussed in Section 3 of this plan.

**B. Describe how the LWIA monitoring system will determine that acceptable progress is made in addressing deficiencies identified during the on-site monitoring visit and how prompt corrective action is taken.**

The Workforce Development Director, Program Manager and the Program Monitor charged with program oversight will review response to monitoring finding and planned corrective actions to determine the adequacy of the response. If necessary, management will consult with appropriate resource persons and department staff to analyze compliance problems and develop further recommendations. The Workforce Program Monitor will be responsible for ensuring that the contractor has take a corrective action as approved by the Workforce Development Director. The Workforce

Program Monitor will conduct a follow-up review after the time line for correction has been met and will themselves make a follow-up visit to ensure the finding has been corrected.

The Workforce Program Monitor charged with oversight will schedule follow-up visits for contractors whose initial review discovered compliance findings. Follow-up visits will be scheduled after sufficient time to allow the contractor to correct program deficiencies. After a follow-up visit, the Workforce Development Director may schedule additional follow-up visits or reviews. The program monitor will write a report on each follow-up visit to document the contractor's progress in resolving compliance findings or other program operations problems. The transmittal of follow-up reports will follow the same path and time line as the initial monitoring report.

**6. Explain how the LWIA will ensure that program quality and outcomes meet the objectives of the Act, regulations, and the local plan, including the provision of services by one-stop centers, eligible providers of training services, and eligible providers of youth activities.**

The monitoring tools discussed throughout this section are developed for each specific contract or service activity, and will include compliance checklists that provide a structure for the monitors to evaluate service quality and outcomes against the objectives and outcomes set forth in the Act, regulations and local plan.

## **Monitoring Plan**

### ***General information***

LCADD staff members will monitor all workforce services provided under the Cumberland Workforce Board authority.. The monitoring plan will be developed by LCADD staff based on the CWIB Policies and Procedures, contracts and State and Federal regulations. The monitoring plan will incorporate all of the following:

- Schedule a timetable for monitoring all funded activities and contractors, including annual reviews of the subcontracts:
- Type of review planned for each contract (on-site review, financial analysis, desk review or other of appropriate review).

LCADD staff members will use standard written monitoring programs for assessing the compliance of each contractor. The program will ensure that contractors' program operations and accounting systems are in compliance with:

- Federal/State laws, regulations and other authoritative pronouncements;
- Contractual and grant requirements;
- Proper expenditure of, and accurate accounting for federal/state funds; and
- The overall goal or delivering services effectively and efficiently.

Monitors may expand review of a contractor beyond the scope of the standard monitoring program, as necessary, to ensure program activities and systems are consistent with the intent of the applicable law. LCADD may also use guides developed by the Departments of the United States Government or other organizations involved in monitoring activities.

LCADD staff members will review each and every workforce related program under the authority of the Cumberland Islands WIB at least once each program year. Follow-up to the review will include a written description of deficiencies and recommended corrective action and quality program enhancements.

Review of summer youth programs will concentrate on program activities, work sites, and training sites during the summer program.

### ***Monitoring Procedures***

Monitors will review any new contractor before or as quickly as can be reasonably scheduled after funds are provided for program activities.

*Scheduling.* The Workforce Program Monitor will schedule all monitoring visits and will also notify contractors of planned visits.

*Desk review.* Monitors will review status of the contract to be monitored before a site visit. Reviews will include contracts, participant record data, and financial information.

*Entrance.* At the beginning of a site visit, monitors will conduct an entrance interview with the appropriate representative(s) of the contractor. In the interview, the monitor will describe the process of the review, the expected timetable for the review, and requirement for information and access to individuals and records.

*Site visit.* The CWIA expects its staff members and contract consultants to carry out reviews in a professional manner and to accommodate special needs or schedules of contractor personnel and participants. Monitors do not harass, intimidate, verbally abuse, or command contractor personnel or program participants for any reason. If a contractor is not, in the monitor's opinion, cooperating in the review process, the monitor will notify the Workforce Development Director immediately.

*Exit interview.* After completing a visit, and before leaving the site, the Workforce Program Monitor will provide an exit interview with appropriate representative of the contractor. In the exit interview, the program monitor will identify all issues of non-compliance found as a result of the review and may offer comments and suggestions on program operation. Further technical assistance may be scheduled at this exit.

*Reporting.* The Workforce Program Monitor will prepare a written report at the conclusion of each review. The report will identify at a minimum: (1) the name of the contractor reviewed, (2) the dates of the review, (3) the date the report is submitted, (4) the site(s) and activities that were reviewed, (5) the names of contractor personnel, program participant, and other individuals interviewed by the monitor, (6) the method of review, (7) findings from the review, including any findings on non-compliance with federal/state laws, regulations and other authoritative pronouncements or LCADD's contract, (8) recommendations for corrective action on these findings, and (9) any other areas of program performance or financial systems that may deserve special attention. The Workforce Program Monitor may make suggestions for improvements in program operation that are not related to compliance issues. Also, each report will highlight contractor successes and accomplishments.

*Deadline for reporting.* All monitoring reports are due to the Workforce Development Director and Program Manager no later than ten (10) working days following the day of the exit interview. When

a finding is discovered, the monitor schedules a briefing with the Workforce Development Director and Program Manager to discuss the draft report and the specific finding prior to submitting the final report to LCADD. All reports are given directly to the Workforce Development Director and Program Manager. A monitor may not release monitoring visit reports. The contract monitor maintains a folder for each contract monitored that includes their results and conclusions, draft reports, review backup materials and follow up information.

*Fraud and criminal activity.* A monitor suspecting fraud or criminal activity on part of an LCADD contractor will notify the Workforce Development Director immediately. LCADD will notify the Division of Workforce Services and, if appropriate, the applicable Federal funding source.

*Transmission of reports.* The Workforce Program Monitor perform the reviews, identify findings, and make observations and recommendations. LCADD makes the final determination to accept the monitors recommendations and if follow-up is required to verify corrective action or expand the review. Contractors are required to respond to the reports in writing within ten (10) working days of report receipt. Responses will describe plans for corrective action with a timetable for accomplishing the changes and the staff person and position responsible for carrying out this action. Monitoring reports, contractor replies and corrective action plans will be maintained on file for each contractor for use in follow-up activities, future monitoring and contract performance reviews.

*Contractor corrective action.* The Workforce Development Director, Program Manager and the Workforce Program Monitor charged with program oversight will review response to monitoring finding and planned corrective actions to determine the adequacy of the response. If necessary management will consult with appropriate resource persons and department staff to analyze compliance problems and develop further recommendations. The Workforce Program Monitor will be responsible for ensuring that the contractor has taken corrective action as approved by the Workforce Development Director. The Workforce Program Monitor will schedule a follow-up review after the time line for correction has been met. The Workforce Program Monitor will make a follow-up visit to ensure the finding has been corrected.

The resolution of monitoring findings and any decision regarding a response to monitoring reports are the responsibility of the Workforce Development Department. Decisions made by the Department regarding monitoring responses are final. Other LCADD staff members do not issue monitoring reports, review responses, or make any determination regarding monitoring findings.

*Areas of review.* Compliance reviews include, at a minimum, the following items:

- basic contract and grant requirements;
- procurement, including contract award process;
- property;
- financial systems and administrative records;
- budgets, cost allow ability cost allocation, and cost limitations;
- participant eligibility;
- participant record keeping systems, tracking and reporting;
- specific legislative and regulatory program operation requirements;
- contract program design requirements;
- grievances, investigations, and grievance hearings;
- EEO and program and site accessibility;

- personnel standards and practices;
- compliance with Federal employment standards;
- compliance with specific CWIA policy and procedures;
- other areas as required by federal/state laws, regulations and other authoritative pronouncements;
- the overall goal of delivering services effectively and efficiently.

During each program year, the CWIB may designate specific areas for special attention by monitors.

### **Follow-up and corrective action**

#### LCADD contractors

*General.* The Workforce Program Monitor charged with oversight will schedule follow-up visits for contractors whose initial review discovered compliance findings. Follow-up visits will be scheduled after sufficient time to allow the contractor to correct program deficiencies. After a follow-up visit, the Workforce Program Director may schedule additional follow-up visits or reviews.

*Reports.* The Workforce Program Monitor will write a report on each follow-up visit to document the contractor's progress in resolving compliance findings or other program operations problems. The transmittal of follow-up reports will follow the same path and time line as the initial monitoring report.

#### Division of Workforce Services monitoring reports

*General.* The Workforce Development Director is responsible for preparing responses to findings from a review by the Division of Workforce Services. The Workforce Development Director is responsible for insuring that LCADD's planned corrective actions are accomplished.

*Review.* The Workforce Development Director will review the implementation of corrective actions taken as a result of the Division of Workforce Services monitoring report.

### **EEO / Accessibility Monitoring**

The Workforce Program Monitor and LCADD's Equal Opportunity (EO) officer will conduct EEO / Accessibility monitoring of its' contractors using checklists in accordance with guidelines issued by the applicable funding source and the Division of Workforce Services.

#### Contractors

Workforce Program Monitor and LCADD's EO officer will share responsibility for monitoring EEO / Accessibility for all work force program contractors. The contract monitors will review (a) assurances, (b) dissemination of policy, (c) physical and program accessibility, (d) data collection record retention and reporting and (e) complaints. The EO Officer reviews equitable services. Findings and any recommended corrective actions will be part of the monitoring report.

- **Frequency.** Monitors and the EO Officer will conduct EEO / Accessibility reviews as a part of the regular annual monitoring for each contractor.

- **Deficiencies.** Any deficiencies will be identified in the monitoring report, along with recommended corrective action for the contractor.
- **Follow-up.** LCADD's EO Officer will follow-up on any endings and recommended corrective actions from the monitoring reports.

### ***Sanctions***

Sanctions for failure to correct deficiencies are listed in LCADD's contracts with its subcontractor's (Special Contract Provisions) and include the following: (a) withholding of funds/reimbursement until the deficiency is corrected, (b) reduction in budget/contract amounts, and (c) termination of the contract. Sanctions are administered after follow-up reviews have documented failure to correct deficiencies and LCADD's Executive Director and CWIB has approved the sanction.

Sanction time lines will be determined on a case-by-case basis depending on the circumstances and severity of the findings.

### ***Conclusion***

Monitoring is the act of evaluating a contractor compliance with applicable laws, regulations, and other authoritative pronouncements and the contract. Both financial and programmatic compliance must be evaluated on a periodic basis.

The Workforce Development Department shall establish timelines for the completion of corrective action plans, based on the severity of the deficiency. The Workforce Development Department shall follow-up and work with the contractor to implement corrective actions. In the event the contractor is unable or unwilling to implement the plan, the LCADD's Executive Director and CWIB shall institute sanctions in accordance with its sanctions policy. The CWIB must establish an appeal process, affording the contractor an avenue to appeal both sanctions and disallowed costs. The appeal process will not be handled by monitoring staff .

Copies of all written reports, responses, backup material, documents and notes collected in conjunction with each monitoring review will be retained by LCADD in accordance with each program's record retention requirements.

## **7. Describe the procedure for handling any WIA grievance from a customer/participant (sections 667.600-667.650)**

### Purpose

This complaint process provides for the prompt review and equitable disposition of complaints alleging violations of the Workforce Investment Act. These procedures are used by the Cumberland Workforce Investment Area and by all its contractors.

### General Policy

1. A complaint as recognized by this process, is defined as an individual or organization's allegation of a violation of the Workforce Investment Act; the WIA regulation' the

Commonwealth of Kentucky contract with the Cumberlands Workforce Investment Board and Lake Cumberlands Area Development District; and LCADD contracts with its contractors. A complaint must be filed within 180 days of the alleged occurrence.

2. The person or organization filing a complaint will be free from restraint, coercion, discrimination, or reprisal. Complaints are not considered as reflecting unfavorably on either the complainant or management, but are to be considered the expression of a lawful right.
3. LCADD has a designated equal opportunity officer who shall:
  - A. Attempt to resolve complaints informally
  - B. Assist customers in filing formal complaints
  - C. Document all complaints and actions
  - D. Ensure that customer complainants are not subjected to adverse treatment
  - E. Provide written guidance to assist students in filing formal complaints
  - F. Advise students of appeal rights and procedures

Procedure

1. Customers are encouraged to resolve complaints informally by talking with their case manager. However if a customer decides to pursue a complaint formally, the complaint must be submitted to the LCADD in the manner described below.
2. The complainant must first file a written, signed complaint with the LCADD’s Complaint/EO Officer. The complainant may simultaneously pursue resolution of the complaint through the internal complaint procedures or through the federal or state agencies having jurisdiction over the substance of the complaint.
3. Upon receipt of the complaint by LCADD, the complainant will be provided written notification that the complaint has been received and the time table under which it will be processed. The complainant has the right to a hearing within 30 days of the receipt of the complaint by LCADD. The Complaint Officer will attempt to reach an informal resolution of the complaint prior to the hearing. The entire complaint process must be completed within 60 calendar days of the receipt of the complaint by LCADD. Pursuit of a complaint past the procedures described above must be directed to the Kentucky Education Cabinet, Department of Workforce Services.

Discrimination Complaints

1. All discrimination complaints must be filed not later than 180 days from the date of the alleged discrimination.
2. The following three steps shall be used in handling such complaints:

STEP	ACTION	TIME FRAME
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STEP ONE	Customer's case manager or staff's immediate supervisor attempts to resolve issues. If unresolved, refer to Step Two.	5 working days
STEP TWO	LCADD EO officer attempts to resolve issues. If unresolved refer to Step Three.	10 working days
STEP THREE	Impartial hearing before Cumberlands Workforce Investment Area EO committee.	Held within 30 days of filing of complaint.
	Committee issues recommendation to LCADD Executive Director.	Within 50 days of filing of complaint.
	LCADD Executive Director issues final written decision.	Within 60 days of filing of complaint
	Complainant may appeal decision to the Directorate of Civil Rights	Within 30 days of the decision

3. All complaints shall be completely documented by EO Officer.
4. Complainants wishing to appeal decisions to the DCR shall be given the address and telephone number by the EO Officer.
5. Documentation shall be kept confidential and shared only with those Cumberlands Workforce Investment Area officials who may need to review the information in the conduct of their official duties.
6. Documentation shall be retained in the center's active files for 3 calendar years, unless otherwise directed.

# CUMBERLANDS WORKFORCE INVESTMENT AREA GRIEVANCE INFORMATION FORM

Please print or type all information

1. Complainant: Please provide the following information concerning the person or organization filing the complaint.

Social Security Number: \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

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

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

\_\_\_\_\_ Work: \_\_\_\_\_

2. Action Complained of: Please describe in detail the action(s) that you are complaining about. (Attach additional pages if necessary)

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

\_\_\_\_\_ Do you believe that your complaint involves a violation of the Workforce Investment Act, the WIA regulations, the WIA grant or other agreement under the Workforce Investment Act?  Yes  No

If Yes, please reference the provision(s) violated:

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

3. Respondent(s): Please name the person(s) or organization(s) that you believe to be responsible for the action(s) that you complained about:

Name(s): \_\_\_\_\_

Address(es): \_\_\_\_\_

\_\_\_\_\_ Explain how each Respondent is responsible for the action(s) that are complaining about: (attach additional pages if necessary)

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

\_\_\_\_\_ Complainant's Signature \_\_\_\_\_ Date

**IX. Assurances**

**Appendix A: Public Comment**

**Describe the LWIA notification of public comment.**