

Policies & Procedures



**Upper Shore Workforce
Scholarship Office**

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Overview

Upper Shore Workforce Training Scholarship Office

Training Fund Focus Policy

Date: 5/23

Training Fund Focus

The WIOA Title I staff are committed to provide employment and training resources that support the local economy in the five counties that comprise the Upper Shore: Kent, Caroline, Talbot, Dorchester, and Queen Anne's. Although there is no geographic eligibility requirement in the WIOA legislation, the local Upper Shore Workforce Board oversees an allocation that is based upon the local economy, its poverty rate, and the unemployment rates in these counties. Beginning September 2018, WIOA Title I funds will only be used to support training strategies for participants who live and/or work in the five counties of the upper shore.

However, a participant who resides in an outlying jurisdiction, but who works or has worked in the local five counties (i.e. dislocated worker) **may** be considered for training resources. All decisions about funding consideration are contingent upon available funding.

Appeal

For those who wish to appeal the decisions of the Director, WIOA, Title I regarding consideration for funding may submit a written request to the Executive Director at

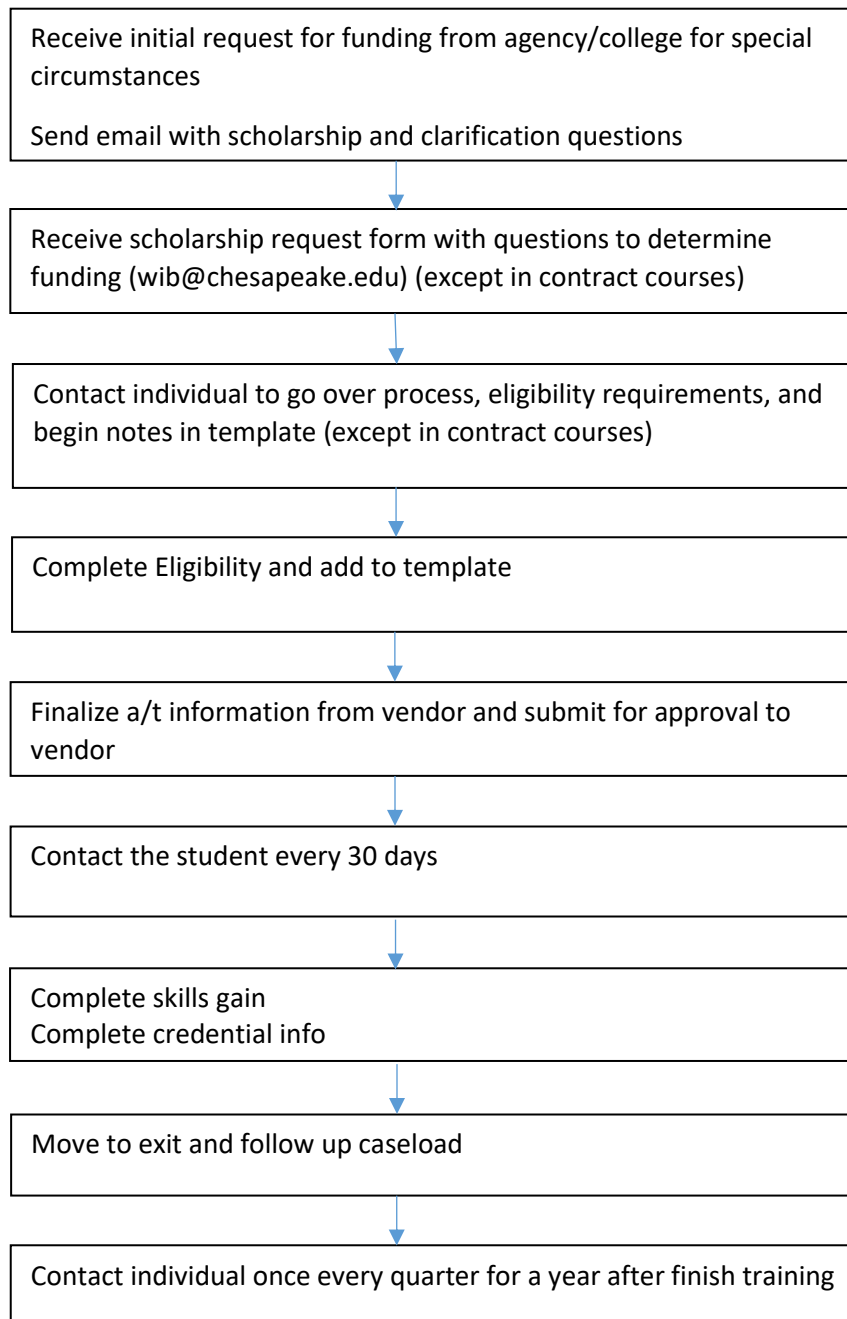
Daniel Schneckenburger, Executive Director
Upper Shore Workforce Investment Board
P O Box 8
Wye Mills, MD 21679

PROCESSES

Upper Shore Workforce Training Scholarship Office

Training Funds for Exceptions

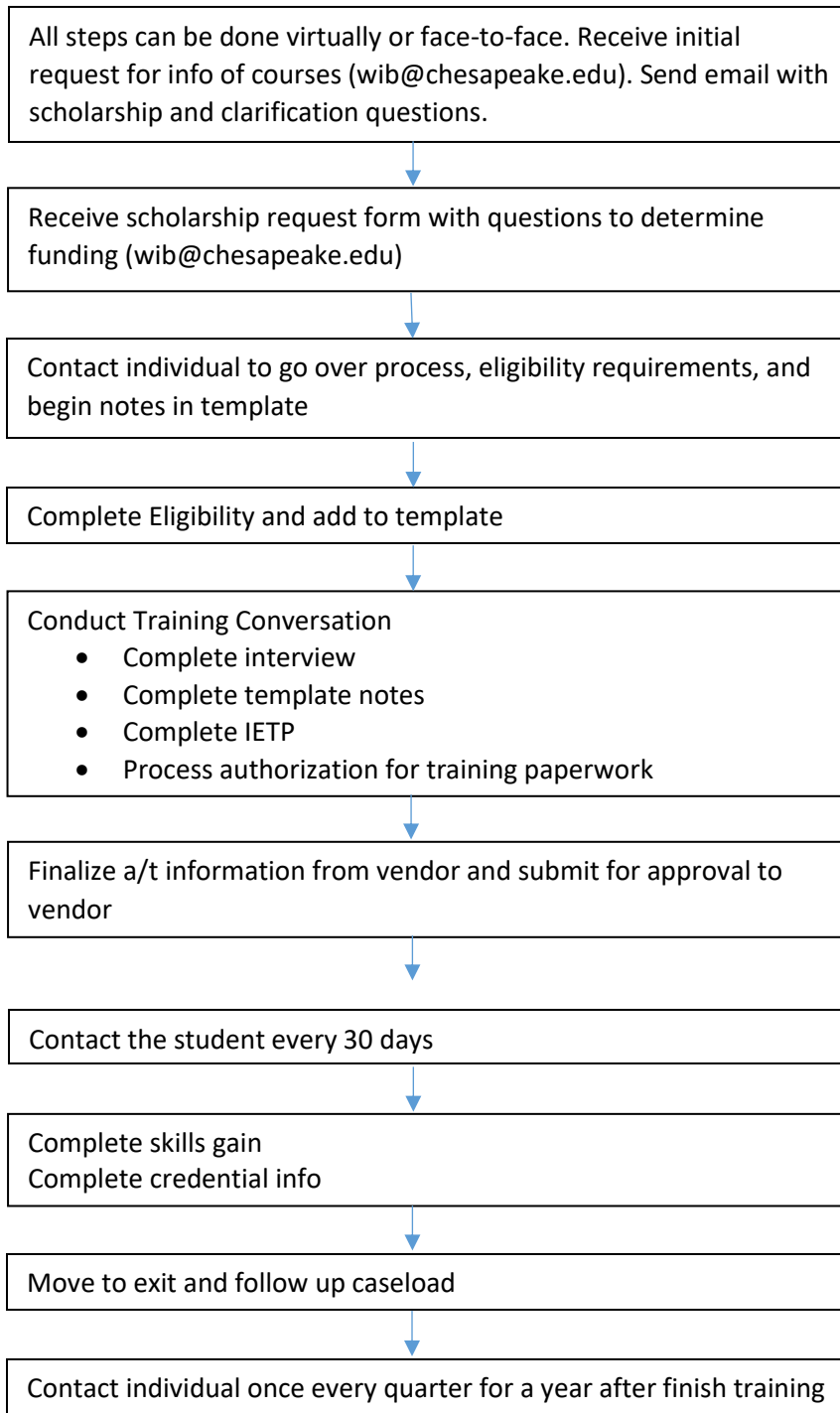
Date: 7/22



Upper Shore Workforce Training Scholarship Office

Regular Training Funds Process

Date: 6/23



1. INTAKE

- Applicant Statement: [Printable](#) | [Fillable](#) 2/2024
- Complaint Procedure: [Fillable](#) 2/2024
- EEO Form: [Fillable](#)
 - *EEO Policy:* [LINK](#)
- O*NET Instructions for Customer: [Printable](#)
 - *Assessment Policy:* [LINK](#)
- Training Funds Qualifying Questionnaire: [Printable 6/2023](#)
- WIOA Application: [Printable](#) | [Fillable](#)
- Youth - Adverse Childhood Experience, ACE Questionnaire: [Fillable](#)
- Required Eligibility Verification: [WA & WD: Printable](#) | [OSY Check Off: Printable](#)
 - *Eligibility Policy:* [LINK](#)
- Selective Service Registration Waiver Request Form: [Fillable](#)

2. CAREER CONVERSATION

- Career Conversation Questionnaire: [Doc](#) | [pdf](#)
- Individual Employment Training Plan (IETP): [Fillable](#)
- Stipend Qualifying Form: [Fillable 9/2022](#)
 - *Stipend Policy:* [LINK](#)
- Customer Choice Letter: [Fillable 8/2023](#)

3. FOLLOW-UP

- *Follow-Up Policy:* [LINK](#)

Case Management

Upper Shore Workforce Training Scholarship Office

Case Management

Date: 5/23

WIOA Title I staff manages caseloads to ensure that the proper documentation is completed in the Maryland Workforce Exchange (MWE) for each participant.

Documentation

Staff is responsible for assuring that the appropriate documentation pertaining to eligibility, procedures, and policies are in the Maryland Workforce Exchange (MWE).

Staff also enters case notes, case assignment updates, and notes regarding contacts made with the individual in the Maryland Workforce Exchange (MWE).

Follow-up

The WIOA Title I staff are committed to ensuring compliance by documenting follow-up for all training participants who are youth (older), adults and dislocated worker participants enrolled in Title I training activities as per our policy (refer to Follow-Up Policy).

Application

Non-Credit Scholarships Student Application

PRINTABLE: [LINK](#)

FILLABLE: [LINK](#)

Eligibility

Upper Shore Workforce Training Scholarship Office

WIOA Training Eligibility: Adult Dislocated Worker, and Youth

Date: 7/22

General Information

The Workforce Opportunity and Innovation Act (Opportunity Act) offers an integrated and comprehensive range of services for job seekers, including adults, dislocated workers, youth, incumbent workers, new entrants to the workforce, veterans, and individuals with disabilities, and employers. The Act's objective is to meet employers' needs by increasing employment, job retention, earnings, and occupational skills levels among all job seekers populations in the local economic region. While this guidance paper will lay out the eligibility guidelines for Training and Career Services under WIOA, simply being determined eligible for service does not entitle a participant to receive said services.

Consideration for the local job-driven economic environment, qualification of training provider, and the individual applicant's training suitability on a case-by-case basis are factors which contribute and assist with the decision-making regarding granting training funding support.

The U.S. Department of Labor uses information that is collected during the eligibility and enrollment process as a means to assess the performance of the state and local workforce development areas and ensure adequate data justifies and supports eligibility and decision-making for local programs.

PII

All enrollment information is uploaded by both the participant and staff on the Department of Labor statewide site. This information is monitored for data validation regarding eligibility by the local WIOA Title I MIS staff for accuracy.

The annual monitoring review includes assurance of the inclusion of appropriate and required signatures, dates and validating documents to ensure the enrollment meets state and federal guidelines. In addition, all enrollments are monitored for programmatic alignment with the policies and direction regarding eligibility for the fund allocation, target groups, veteran priority and hard-to-serve intentions as indicated in the operational plan.

Title I Program Eligibility Requirements

WIOA Title I eligibility is established for the following programs: Adults, Dislocated Workers, Out of School and In-School Youth. In order to utilize Title I funding, a participant must meet all required eligibility criteria, as follows:

WIOA TITLE I ADULT AND DISLOCATED WORKER PROGRAM ELIGIBILITY | OCTOBER 4, 2021 | POLICY ISSUANCE 2021-13

LINK: <https://www.dllr.state.md.us/employment/mpi/mpi13-21.pdf>

Adult Program Eligibility

- Be at least 18 years old at the time of enrollment;
- Be a U.S. citizen or non-citizen with appropriate authorization to work in the U.S.;
- Have registered, as appropriate for Selective Service; *and*
- Align with the current Upper Shore WIOA priority of service requirements, as communicated in the Operational Plan regarding meeting the hardest-to-serve ratio of 51%, and all veteran-related priority mandates for services delivery.
- Be referred directly by any One-Stop Career Center staff as one who could benefit from Career and Training Services

Dislocated Worker Program Eligibility

- Be at least 18 years old at the time of enrollment;
- Be a U.S. citizen or non-citizen with appropriate authorization to work in the U.S.;
- Have registered, as appropriate for Selective Service; *and*
- Deemed eligible for retraining funds based upon the definition of a Dislocated Worker as presented in the Operational Plan.
- Would benefit from occupational skills training, on-the-job training or internship and apprenticeship work-based experiences, based upon lengthy work history with temporary staffing agencies.

WIOA Section 3(15) provides several definitions of a Dislocated Worker. These definitions are included below as they appear on the Maryland Workforce Exchange (MWE) system.

Category	Requirements
General Dislocated Worker (Covered by Unemployment Insurance)	<ul style="list-style-type: none">• Has been terminated or laid off, or has received a notice of termination or layoff;• Is eligible for or has exhausted unemployment insurance benefits; AND

Category	Requirements
	<ul style="list-style-type: none"> Is unlikely to return to previous industry or occupation, and would benefit from occupational skills training, on-the-job training or internship and apprenticeship work-based experiences.
General Dislocated Worker (Not Covered by Unemployment Insurance)	<ul style="list-style-type: none"> Has been terminated or laid off, or has received notice of termination or layoff; Has been employed for at least two pay periods or one month (whichever is less), but is not eligible for unemployment insurance compensation due to insufficient earnings or because he/she worked for an employer not covered under the Maryland unemployment insurance law; <i>AND</i> Is unlikely to return to previous occupation or industry, and would benefit from occupational skills training, on-the-job training or internship and apprenticeship work-based experiences.
Facility Closure	<ul style="list-style-type: none"> Has been terminated or laid off, or has received notice of termination or layoff, from employment as a result of the permanent closure of or substantial layoff at a plant, facility, or enterprise, and would benefit from occupational skills training, on-the-job training or internship and apprenticeship work-based experiences.
General Announcement	<ul style="list-style-type: none"> Is employed at a facility at which the employer has made a general announcement that the facility will close, and would benefit from occupational skills training, on-the-job training or internship and apprenticeship work-based experiences.
Self-employed Dislocated Worker	<ul style="list-style-type: none"> Was previously self-employed (including farmers, ranchers, and fishermen), but is unemployed due to general economic conditions in the community of residence or because of natural disaster, and would benefit from occupational skills training, on-the-job training or internship and apprenticeship work-based experiences.
Displaced Homemaker	<ul style="list-style-type: none"> Has been providing services to family members in the home; and Has been dependent on the income of another family member but is no longer supported by that income, and would benefit from occupational skills training, on-the-job training or internship and apprenticeship work-based experiences.
Military Spouse (Permanent Change of Station)	<ul style="list-style-type: none"> Is the spouse of a member of the Armed Forces on active duty, and has experienced a loss of employment as a direct result of relocation to accommodate a permanent change of duty station of such member, and would benefit from occupational skills training, on-the-job training or internship and apprenticeship work-based experiences.
Military Spouse (All other cases)	<ul style="list-style-type: none"> Is the spouse of a member of the Armed Forces on active duty; Is unemployed or underemployed and experiencing difficulty in obtaining or upgrading employment, and would benefit from occupational skills training, on-the-job training or internship and apprenticeship work-based experiences.

Youth Program Eligibility

To participate in the WIOA Youth program, a participant must meet the following requirements:

- Be a U.S. citizen or non-citizen with appropriate authorization to work in the U.S.;
- Meet all applicable Selective Service registration requirements; and
- Meets at least one barrier to employment for WIOA In-School Youth or Out-of-School Youth eligibility, as outlined in the Barriers to Employment chart (below.)
- Have a WIOA training plan that describes how the youth will benefit from training strategies, such as occupational skills training, on-the-job training, internship and/or apprenticeship work-based experiences;

WIOA Section 129(a)(1)(b) defines an **out-of-school** youth as a participant who is:

- Not attending any school;
- Is between the ages of 16-24 at the time of enrollment; and
- Meet one of the barriers listed as outlined in the Eligibility Barriers to Employment chart (below.)

WIOA Section 129(a)(1)(c) defines an **in-school youth** as a participant who is:

- Attending school;
- Is between the ages of 14-24 at the time of enrollment;
- Meets one of the barriers listed as outlined in the Eligibility Barriers to Employment chart (below.)

Youth Barriers to Employment
A young person who has dropped out of School (<i>Does not include GED or high school equivalency programs or drop-out reengagement programs</i>).
A young person within the age of compulsory school attendance (<i>currently as this policy is written, aged 18 years</i>) but has not attended school the most recent calendar quarter.
A young person who is the recipient of a high school diploma or GED who is also : Earning less than 100% of the federal poverty wage or 70% of the LLSI (whichever is greater) or otherwise qualifies as low-income; and <ul style="list-style-type: none">• Basic skills deficient, based upon completion of testing (such as CASAS or TABE testing) establishing low reading/math/writing skill levels or• Is an English Language Learner (ELL) or• Referral from Title II, ESOL partner regarding low language skill levels

<ul style="list-style-type: none"> • Provides other suitable evidence of skills deficiency as determined by the Director and documented in the participant’s file and case notes.
A young person who has been exposed to the juvenile or adult justice system, where public knowledge of an event could be a barrier to employment.
A young person who self-identifies as Homeless, or as a runaway youth or has no fixed permanent address
<p>A young person who:</p> <ul style="list-style-type: none"> • Is currently in the foster care system, or has aged out of the foster care system; or • Is 16 years of age and left foster care for kinship guardianship or adoption; or • Is eligible for assistance under Section 477 of the Social Security Act; or • Is an Out-of-home foster care placement.
A young person who is pregnant, or who is parenting, or parenting as a non-custodial parent.
A young person who identifies as being a disabled individual, subject to corroboration by a qualifying agency or doctor’s verification (who may be experiencing the disability as a barrier to employment.)
A young person who qualifies as low income (earning less than 100% of the federal poverty wage or 70% of the LLSI (whichever is greater), or receives public assistance such as SNAP or TANF and Requires additional assistance
A young person who qualifies as low income because the applicant resides in a high poverty area (TEGL-21-16, pg. 5, instructions on Attachment 2) therefore, the family income is not calculated (listed as zero) and Requires additional assistance
<ul style="list-style-type: none"> • The “Requires additional assistance” descriptor applies to any young person if • The young person is a high school graduate that has worked less than 35 hours a week for more than 13 consecutive weeks in the last year (case notes or applicant statement or pay stubs). or • The young person is a high school graduate who has been dismissed from a job within the last 12 months and not working at time of application (case notes or applicant statement). or • The young person requires a credential in order to enter or advance along a sustainable career pathway, and is unlikely to obtain such a credential independently (case notes). or • The young person who scores a minimum of one on the Adverse Childhood Experience (ACE) questionnaire (questionnaire used as self-attestation in applicant file.)

Additional young people, but not more than 5% of youth participants, may be served who have been identified by any One-Stop Career Center (American Job Center (AJC) staff as one who is eligible under the requires additional assistance description and does not qualify as low income.

Upper Shore Workforce Training Scholarship Office

Training Eligibility for ARPA Funds Policy

Date: 8/22

The Upper Shore Workforce Scholarship office received funds for the American Rescue Plan Act (ARPA) through the year 2026. These funds have specific guidelines for eligibility. These qualifying factors are:

- Economically impacted
- Food insecurity
- Not current on rent
- Lost child care due to Covid
- Left the labor force
- Long term unemployment
- Credit score damage
- Adverse childhood experience (ACE questionnaire)
- Low income household
- Moderate income household
- In person work during Covid
- Concentrated poverty
- Virtual and hybrid learning
- Essential workers
- Post unemployment wage
- *Not qualified – remote workers able to stay employed with no disruptions*

If an individual meets any one of the above qualifications they are eligible for training under the ARPA funds. These individuals *may* be co-enrolled in a WIOA training program as well if they meet the WIOA eligibility qualifications. (Refer to WIOA Training Eligibility policy)

In addition to one of the qualifying factors listed above, the Scholarship office must assure the individual is a US citizen and able to work in the United States. The following list includes the documents can be used for verification and requirements of the office:

- Birth Certificate
- Social Security Card
- Completed application and qualifying questions
- Register on MWE for tracking purposes only

If an individual does not have these documents others can be substituted to prove both the citizenship and employment eligibility.

ARPA participants will be contacted every 30 days while in school and have follow up for the year after the training is completed.

Upper Shore Workforce Training Scholarship Office

Training Eligibility for Non-WIOA Funds Policy

Date: 7/22

The Upper Shore Workforce Scholarship office receives funds from various community, federal, and state agencies. These funds have various qualifying factors and support students in various ways. Therefore, whenever possible it is the practice of the Upper Shore Workforce Training Scholarship Office to complete the WIOA Title 1 eligibility. By completing this eligibility, the individual is qualified to have the WIOA Title 1 funds braid with the outside sources to fund the individual request 100 percent.

However, if the student or the training request is not eligible for WIOA Title 1 funds, the office must collect at a minimum:

- Birth Certificate
- Social Security Card or approved other information to verify ability to work in the US
- Completed application and qualifying questions

As all WIOA funded participants, the individual will be contacted every 30 days while in school and have follow up for the year after the training is completed.

Priority of Service

Upper Shore Workforce Training Scholarship Office

Priority of Service Policy

Date: 7/22

As stated in WIOA Section 134(c)(3)(E), with respect to individualized career services and training services funded with WIOA Title I funds, priority of service must be the protocol for the following, in order:

- 1) Veterans (who meet eligibility requirements for WIOA Title 1 adult programs)
- 2) Spouses of Veterans (who meet eligibility requirements for WIOA Title 1 adult programs)
- 3) TANF or TCA recipients (who meet eligibility requirements for WIOA Title 1 adult programs)
- 4) SNAP recipients (who meet eligibility requirements for WIOA Title 1 adult programs)
- 5) Basic skills deficient or language learner (who meet eligibility requirements for WIOA Title 1 adult programs)
- 6) Ex-offenders (otherwise eligible hard-to-serve individuals)

USWIB has identified the target group above for determining priority of Title I services delivery and training support. These individuals in the target group above, eligible for WIOA Title I, shall be given precedence when evaluating funding availability. Once the allocation expense in Title I has reached the 51 % level, Veterans and their eligible spouses will continue to receive precedence.

NOTE: An additional two vouchers, valued at \$7000 each will remain in reservation in the instance Veterans and their eligible spouses apply at the end of the funding cycle. Two vouchers will also be kept reserved for TANF recipients who might apply at the end of the funding cycle.

Staff

Intake and eligibility staff shall expand the collection of information regarding public assistance programs that an individual or family may be receiving. Education levels that have been assessed by the Adult Basic Education programs, and language skills assessments that may have been assessed by the Adult Family Literacy programs (ESL):

test scores may also be used to establish basic skills deficiency and language learning skill levels.

Reporting elements necessary for the determination of the priority of services percentage will include only those participants who have appropriate documentation for the priority of service group they have identified.

Attached is the table for clarifying priority of service strategy.

Priority of Service WIOA Title I Adult

Priority	Group	Explanation	Percentage
1	Veterans	Veterans who are also low income (lower living standards chart), and who have been assessed as could benefit from training;	
2	Eligible Spouses of Veterans	Eligible Spouses who are also low income (lower living standards chart), and who have been assessed as could benefit from training;	
3	Public Assistance: TANF, TCF	Receive cash transfer grants as verified by DSS, and who have been assessed as could benefit from training;	
4	SNAP	Receive benefits as verified by DSS, and who have been assessed as could benefit from training;	
	Services to groups 1+2+3+4	Minimum service levels must equal 51 %	51%
5	Basic Skills Deficient, Language Learners	Low income (lower living standards chart) individuals who have been assessed as basic skills deficient using AFL CASAS testing, and who have been assessed as could benefit from training; or those low income individuals (lower living standards chart) who have tested as ESL language learners,	

		who have been assessed as could benefit from training;	
6	Ex-offenders	Low income individuals (lower living standards chart) who have been released from prison or detention centers, and who have been assessed as could benefit from training.	
7	Adults, over 18 years of age	Who have been assessed as could benefit from training	
	Services to groups 5+6+ 7		49%

Upper Shore Workforce Training Scholarship Office

Non-ETPL Funding Policy

Date: 7/22

The Workforce office uses the customer choice model when approving training vouchers. Therefore, many times an individual request training that is not WIOA funded by WIOA. These situations include:

- Training vendor not on the approved training list in Maryland
- Training vendor on the approved training list in their state but not Maryland
- Training vendor with trainings on the approved ETPL list but not the training the individual is requesting
- Training vendor not on approved training list in any state

Each of these training request may be approved through the scholarship office if there are funds available other than the WIOA funds.

The staff is responsible to research the request and explain to the director the situation and why it should be approved. If the vendor is not on the list, a pre-training vendor approval must be completed. This must be completed prior to an authorization for training being approved for the individual.

Again, all training request will only be granted for non ETPL WIOA funded approval if the vendor information is completed and funds are available.

**WIOA TITLE I TRAINING & MARYLAND'S ELIGIBLE TRAINING PROVIDER LIST | POLICY
ISSUANCE 2023-03 | FEBRUARY 16, 2023**

[POLICY ISSUANCE 2023-03](#)



POLICY ISSUANCE 2023-03

WIOA Title I Training & Maryland's Eligible Training Provider List | February 16, 2023

TO: Division of Workforce Development and Adult Learning
(DWDAL) staff and Local Workforce Development Area (Local Area)
directors

FROM: Division of Workforce Development and Adult Learning
Maryland Department of Labor (MD Labor)

SUBJECT: WIOA Title I Training & Maryland's Eligible Training Provider List

PURPOSE: To provide comprehensive policy guidance on processes related to
Maryland's Eligible Training Provider List

ACTION: Local Area Directors, American Job Center (AJC) Reemployment Program
Directors, and central office managers will ensure all employees are aware
of and receive copies of this policy. DWDAL policies are available on [the
MD Labor website](#).

EXPIRATION: Until cancelled or replaced.

QUESTIONS:

Carolyn Mitchell, Director
Director, OWIP
410.767.2759
carolyn.mitchell@maryland.gov

Lloyd Day
Director, OWD
410.767.2995
lloyd.day@maryland.gov

Erin Roth
Deputy Assistant Secretary, DWDAL
410.767.5870
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Funding Approval

Upper Shore Workforce Training Scholarship Office

Title I Adult Program Approval Requirements

Date: 7/22

Title I Staff Adult Program Approval Requirements:

In order to receive approval of a training voucher, an individual must provide the following information during the career conversation portion of the process.

- A. Job Driven: are there available jobs for the training requested? Describe the job listings and/or descriptions you have found in the five county region.
 - What are the qualifications needed for the job listed?
 - What qualifications are needed to meet the descriptions?
 - What training is required to attain the needed qualification- certification, Degree, credential?
 - What is the entry-level wage for the position you hope to obtain with the training?
 - How much experience will be needed to meet the qualifications?
 - What other skills do they have that may crosswalk toward the qualifications?
 - Why would you say this is a good fit or match for you?

- B. Can I support myself (and my family) with this career and training choice?
 - Is the employment outlook strong – is this career becoming obsolete, changing in some way, or becoming more in-demand?
 - Will the training give me qualification for a full-time or part-time position?
 - Will I be able to support myself with the entry-level wage?
 - What promotional opportunities, or learning-on-the-job opportunities does the job offer? (career ladder/pathway, upgrade of skills, increase pay)

- C. Training choices: is the training a classroom occupational training, on-the-job training, customized training, seminar, online training?
 - What can I find out about the performance of the training provider?
 - How many students has the institution trained?
 - What is the ratio of trainees to completers?

- What is the number of those who have been trained who are employed?
- What is the length of the training?
- Where is the training located?
- What is the cost of the training?
- Does the training result in a credential?
- Is the training approved on an ETPL list?

D. Support Plan

- How will I support myself during the training period?
- Do I have reliable transportation? Back up plans if something happens?
- Child care needs: Do I need adult or child care? Do I have a backup plan if something happens?
- Am I prepared if I am offered shift work that falls outside regular business hours?
- Do I have a list of prospective employers to contact when I am ready to apply for a position?

TRAINING APPROVAL

The following policy guidelines are hereby established regarding the methodology Title I staff will use to approve candidates for training plans. All consideration for training support will be based upon the training proposal which is selected and submitted by the training candidate, who will demonstrate that the training will relate to qualifying for a position or within a career or industry. Title I training strategies included classroom training, earn and learn options such as internships, on the job training (OJT), work experience placements, apprenticeship and pre-apprenticeship opportunities. As a general rule, training plans must result in a certificate or license, industry-recognized credential, or other experiential-based outcomes which provide at least an entry-level gateway into the chosen career field that is **in-demand in the local five-county economic environment. In addition, funding is intended for W-2 employment arrangements. Training that generally leads to 1099 status is not eligible for funding support.** All decisions regarding funding support approvals are contingent upon available funding.

A. Scholarship Training Funds Approval

Training funds will be distributed to those individuals that meet the eligibility requirements for the grants which they will be funded. These funds will vary according to the requirements given by the grantor. Because these requirements vary drastically, the director or office manager will determine the funding agent and give final approval based on availability of said funds.

The USWIB WIOA Title I training funds has a training cost cap of \$7000 per account. When an individual requests additional training in the same field (career ladder), this is not considered a second training and only requires an update of the IETP. If an individual request additional funds for a new career path, the additional training policy will be followed.

B. [Customer Choice Model](#)

Training applicants are free to choose the training they believe will lead to their best career match. If only WIOA funds are available, the applicant must determine their request by choosing from the ETPL list. If additional funds are available, the individual can choose other training options based on the Non WIOA approved training funds policy.

If an individual request training funds for PELL eligible programs, the individual must apply for those prior to any scholarship funds being approved. If the program is longer than the approved/non approved timeframe, the individual must reapply for the PELL funds.

C. [Local Priority of Service](#)

Priority will be given to those training applicants who are in the Priority of service target groups as long as the total cost for training achieves a 51% ration of all funds expenses.

1. Eligible Veterans an Eligible spouses of veterans
Veteran candidates (and eligible spouses) applying for training scholarships are the first priority of service. He or she will receive first consideration regarding available funds approval. They must be determined eligible before priority is in place.
2. TANF/TCA Recipient Applicants
Poverty candidates receiving TANF/TCA assistance are also a priority of service target group. An eligible TANF/TCA recipient, who has completed all steps in the process, will receive the next consideration regarding available training fund approval.
3. SNAP recipient applications
Poverty candidates receiving SNAP assistance are also a priority of service target group. An eligible SNAP recipient training applicant, who has completed all steps in the process, will receive next consideration regarding available training fund approval.
4. Ex-offenders
Candidates who have completed detention time and have been released are also a priority of service target group. An eligible ex-offender, who has completed all steps in the process, will receive next consideration regarding available training fund approval.

D. Employer Demand

An applicant will demonstrate employer demand by reviewing the local employment recruitment postings regarding his/her chosen field of study. These may include, internet, job fair and other social media job postings. The requirement for presenting local employment opportunity harks back to the idea that training funds have been awarded to support the local five-county economic environment. These listing will be included in the individual's career conversation responses.

Note: Employer listening strategies will be employed through the year to connect the training funds to those occupations which are high demand in the five county region. This will be done in a variety of ways including:

1. A survey of employers regarding their proprietary training needs, both within their business and the current industry cluster;
2. Listening sessions will be coordinated to connect directly with the needs of the employers regarding the qualification needed for open positions
3. Business feedback may be gained by participating in local training vendor advisory boards, which are actively associated with industry based training categories
4. Job Fair employer data: those employers who attend job fairs recruiting for open positions
5. Job listing employer data (DWDAL business staff): job listing from employers who are actively recruiting

TRAINING PROVIDER

The following policy guidelines are hereby established regarding the determination of eligible training providers for approved WIOA vouchers.

Using the customer service model, the staff will ensure training candidates are directed to those institutional vendors which have been approved using a format or mechanism which provides specific information regarding the description of the curriculum, as well as the length, cost, potential credential outcome, and which may test the historical ration (%) of the number of students who participated with the number of those who completed training, and also the number of those who became employed upon completion of the training.

In Maryland, the Maryland Department of Labor <https://www.dllr.state.md.us/employment/train/> site for reference to validate that the training curriculum has been approved for voucher approval.

Other programs from training institutions not in Maryland will also be considered as that state's workforce entity provides similar information for training curriculum approval.

If an individual request training that is not on an approved list, the staff should use the Off ETPL list policy to make the determination.

Certain training providers are not subject to the requirements of the ETPL provisions, as set forth in WIOA Title I-B Section 122. Training services exempt from eligibility requirements include:

- On-the-job training (OJT) – training by an employer that is provided to a paid participant while engaged in productive work in a job that provided knowledge and skills essential to the full and adequate performance of the job and is made available through an OJT program;

- Customized training – Designed to meet the specific requirements of an employer (including a group of employers); customized training can be a training strategy if:
 - Training is conducted with a commitment by the employer to employ an individual upon successful completion of the training; and,
 - The employer pays a significant portion of the cost of training, as determined by the local board involved, taking into account the size of the employer and other such factors as the local board determines to be appropriate, which may include the number of employees participating in training, wage and benefit levels of those employees (at present and anticipated upon completion of the training; and,
 - The relevance of the training to the competitiveness of a participant, i.e. regarding his/her skills, and other employer-provided training and advancement opportunities.
- Incumbent worker training – the purpose of the training is to assist workers in obtaining the skills necessary to retain employment or avert layoff;
- Transitional employment – Time-limited work experiences which are to be combined with comprehensive employment and supportive services and are to be designed to help individuals lead to entry into and retention of unsubsidized employment;
- Internships and Work Experience – Planned, structured learning experience that takes place in a workplace for a limited period of time. Work experience may be paid or unpaid, as appropriate. An internship or work experience may be arranged within the private for profit sector, the non-profit sector, or the public sector.
- When the local board provides training services through a pay-for-performance contract; or, circumstances describe in WIOA Section 134 (C)(3)(g)(ii), where the local board determines that:
 - There are insufficient providers; or,
 - There is a training services program that demonstrated effectiveness offered in the local area by a community-based organization or other private organization to serve individuals with barriers to employment; or

Where appropriate to award a contract to an institution of higher education or other eligible provider of training services in order to facilitate the training of multiple individuals for an in-demand industry sectors or occupations, and such contract does not limit customer choice.

All voucher approvals are contingent upon available funding.

Appeal Process

Training voucher decisions can be appealed.

1. Anyone who disagrees with the decision may opt to appeal their request
2. All request must be in writing
3. Request will be forwarded to the Executive Director for review, and a decision will be made within 30 days, contingent upon available funding.

Self-Sufficiency

Upper Shore Workforce Training Scholarship Office

Guidance on Self Sufficiency Policy

Date: 1/24

The Upper Shore Workforce Scholarship office determines an adult who is self-sufficient based on either 200% of the Health and Human Services poverty level, or the MIT Living Wage Calculator (<https://livingwage.mit.edu/>) for the county in which the individual resides. The determination will be based on whichever calculation is the greater of the two.

If the individual does not qualify as self-sufficient, through income, they may still qualify according to TEG-3-15 which states: **“Under WIOA, training services may be provided if a on stop center staff member determines, after an interview, evaluation, or assessment, and career planning, that:**

a. Through career services alone, the potential training candidate is:

Unlikely or unable to obtain employment leading to economic self-sufficiency;

-OR-

Unlikely or unable to retain employment leading to economic self-sufficiency;

-OR-

Unlikely or unable to obtain wages comparable to or higher than wages from previous employment

b. Through career services alone the potential candidate is:

Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency;

-OR-

Unlikely or unable to obtain or retain wages comparable to or higher than wages from previous employment;

-AND-

Is in need of training services.

The potential training candidate is able to meet the skills and qualifications to successfully participate in the selected program of training services.

All exceptions to the income determination will be explained with case notes in the Individual Education Training Plan.

Wage Calculation

MIT Living Wage Calculator: <https://livingwage.mit.edu/>

Yearly Wage: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

Downloaded 1/8/2024

Living Wage Calculation for Caroline County, Maryland

The living wage shown is the hourly rate that an **individual** in a household must earn to support his or herself and their family. The assumption is the sole provider is working full-time (2080 hours per year). The tool provides information for individuals, and households with one or two working adults and zero to three children. In the case of households with two working adults, all values are **per working adult, single or in a family** unless otherwise noted.

The state minimum wage is the same for all individuals, regardless of how many dependents they may have. Data are updated annually, in the first quarter of the new year. State minimum wages are determined based on the posted value of the minimum wage as of January one of the coming year (National Conference of State Legislatures, 2019). The poverty rate reflects a person's gross annual income. We have converted it to an hourly wage for the sake of comparison.

For further detail, please reference the [technical documentation here](#).

	1 ADULT				2 ADULTS (1 WORKING)				2 ADULTS (BOTH WORKING)			
	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children	3 Children
Living Wage	\$16.30	\$32.73	\$41.15	\$53.86	\$26.06	\$32.46	\$37.35	\$41.64	\$13.01	\$18.32	\$22.87	\$27.15
Poverty Wage	\$6.53	\$8.80	\$11.07	\$13.34	\$8.80	\$11.07	\$13.34	\$15.61	\$4.40	\$5.54	\$6.67	\$7.81
Minimum Wage	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25

Downloaded 1/8/2024

Living Wage Calculation for Dorchester County, Maryland

The living wage shown is the hourly rate that an **individual** in a household must earn to support his or herself and their family. The assumption is the sole provider is working full-time (2080 hours per year). The tool provides information for individuals, and households with one or two working adults and zero to three children. In the case of households with two working adults, all values are **per working adult, single or in a family** unless otherwise noted.

The state minimum wage is the same for all individuals, regardless of how many dependents they may have. Data are updated annually, in the first quarter of the new year. State minimum wages are determined based on the posted value of the minimum wage as of January one of the coming year (National Conference of State Legislatures, 2019). The poverty rate reflects a person's gross annual income. We have converted it to an hourly wage for the sake of comparison.

For further detail, please reference the [technical documentation here](#).

	1 ADULT				2 ADULTS (1 WORKING)				2 ADULTS (BOTH WORKING)			
	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children	3 Children
Living Wage	\$16.32	\$32.26	\$40.68	\$53.40	\$26.08	\$31.99	\$36.88	\$41.22	\$13.02	\$18.08	\$22.63	\$26.94
Poverty Wage	\$6.53	\$8.80	\$11.07	\$13.34	\$8.80	\$11.07	\$13.34	\$15.61	\$4.40	\$5.54	\$6.67	\$7.81
Minimum Wage	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25

Living Wage Calculation for Kent County, Maryland

The living wage shown is the hourly rate that an **individual** in a household must earn to support his or herself and their family. The assumption is the sole provider is working full-time (2080 hours per year). The tool provides information for individuals, and households with one or two working adults and zero to three children. In the case of households with two working adults, all values are **per working adult, single or in a family** unless otherwise noted.

The state minimum wage is the same for all individuals, regardless of how many dependents they may have. Data are updated annually, in the first quarter of the new year. State minimum wages are determined based on the posted value of the minimum wage as of January one of the coming year (National Conference of State Legislatures, 2019). The poverty rate reflects a person's gross annual income. We have converted it to an hourly wage for the sake of comparison.

For further detail, please reference the [technical documentation here](#).

	1 ADULT				2 ADULTS (1 WORKING)				2 ADULTS (BOTH WORKING)			
	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children	3 Children
Living Wage	\$16.71	\$33.25	\$41.67	\$54.87	\$26.48	\$32.98	\$37.86	\$42.58	\$13.22	\$18.58	\$23.12	\$27.62
Poverty Wage	\$6.53	\$8.80	\$11.07	\$13.34	\$8.80	\$11.07	\$13.34	\$15.61	\$4.40	\$5.54	\$6.67	\$7.81
Minimum Wage	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25

Living Wage Calculation for Queen Anne's County, Maryland

The living wage shown is the hourly rate that an **individual** in a household must earn to support his or herself and their family. The assumption is the sole provider is working full-time (2080 hours per year). The tool provides information for individuals, and households with one or two working adults and zero to three children. In the case of households with two working adults, all values are **per working adult, single or in a family** unless otherwise noted.

The state minimum wage is the same for all individuals, regardless of how many dependents they may have. Data are updated annually, in the first quarter of the new year. State minimum wages are determined based on the posted value of the minimum wage as of January one of the coming year (National Conference of State Legislatures, 2019). The poverty rate reflects a person's gross annual income. We have converted it to an hourly wage for the sake of comparison.

For further detail, please reference the [technical documentation here](#).

	1 ADULT				2 ADULTS (1 WORKING)				2 ADULTS (BOTH WORKING)			
	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children	3 Children
Living Wage	\$17.99	\$36.79	\$46.27	\$60.52	\$28.97	\$35.68	\$40.57	\$45.30	\$14.47	\$20.35	\$25.31	\$30.24
Poverty Wage	\$6.53	\$8.80	\$11.07	\$13.34	\$8.80	\$11.07	\$13.34	\$15.61	\$4.40	\$5.54	\$6.67	\$7.81
Minimum Wage	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25

Living Wage Calculation for Talbot County, Maryland

The living wage shown is the hourly rate that an **individual** in a household must earn to support his or herself and their family. The assumption is the sole provider is working full-time (2080 hours per year). The tool provides information for individuals, and households with one or two working adults and zero to three children. In the case of households with two working adults, all values are **per working adult, single or in a family** unless otherwise noted.

The state minimum wage is the same for all individuals, regardless of how many dependents they may have. Data are updated annually, in the first quarter of the new year. State minimum wages are determined based on the posted value of the minimum wage as of January one of the coming year (National Conference of State Legislatures, 2019). The poverty rate reflects a person's gross annual income. We have converted it to an hourly wage for the sake of comparison.

For further detail, please reference the [technical documentation here](#).

	1 ADULT				2 ADULTS (1 WORKING)				2 ADULTS (BOTH WORKING)			
	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children	3 Children	0 Children	1 Child	2 Children	3 Children
Living Wage	\$17.81	\$34.92	\$44.25	\$58.68	\$27.74	\$33.81	\$38.70	\$43.59	\$13.86	\$19.41	\$24.38	\$29.38
Poverty Wage	\$6.53	\$8.80	\$11.07	\$13.34	\$8.80	\$11.07	\$13.34	\$15.61	\$4.40	\$5.54	\$6.67	\$7.81
Minimum Wage	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25	\$13.25

Equal Opportunity

Equal Opportunity is the Law

LINK: https://www.uswib.org/files/ugd/9b1e84_09ed9dd4c10741d8b8f06dbb1a537762.pdf

It is against the law for this recipient of Federal financial assistance to discriminate on the following basis: against any individual in the United States, on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, sex stereotyping, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, or political affiliation or belief, or, against any beneficiary of, applicant to, or participant in programs financially assisted under Title I of the Workforce Innovation and Opportunity Act, on the basis of the individual's citizenship status or participation in any WIOA Title I–financially assisted program or activity.

The recipient must not discriminate in any of the following areas: deciding who will be admitted, or have access, to any WIOA Title I–financially assisted program or activity; providing opportunities in, or treating any person with regard to, such a program or activity; or making employment decisions in the administration of, or in connection with, such a program or activity.

Recipients of federal financial assistance must take reasonable steps to ensure that communications with individuals with disabilities are as effective as communications with others. This means that, upon request and at no cost to the individual, recipients are required to provide appropriate auxiliary aids and services to qualified individuals with disabilities.

WHAT TO DO IF YOU BELIEVE YOU HAVE EXPERIENCED DISCRIMINATION

If you think that you have been subjected to discrimination under a WIOA Title I–financially assisted program or activity, you may file a complaint within 180 days from the date of the alleged violation with either the WIOA Title I

Equal Opportunity Officer: Daniel Schneckenburger

P O Box 8, Wye Mills, MD 21679

Telephone (410) 822-1716 ext. 2271

Email: dschneckenburger@chesapeake.edu

OR

Director, Civil Rights Center (CRC), U.S. Department of Labor

200 Constitution Avenue NW, Room N-4123, Washington, DC 20210 electronically as directed on the CRC website at www.dol.gov/crc . If you file your complaint with the recipient, you must wait either until the recipient issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the Civil Rights Center (see address above). If the recipient does not give you a written Notice of Final

Action within 90 days of the day on which you filed your complaint, you may file a complaint with CRC before receiving that Notice. However, you must file your CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which you filed your complaint with the recipient). If the recipient does give you a written Notice of Final Action on your complaint, but you are dissatisfied with the decision or resolution, you may file a complaint with CRC. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action.

I acknowledge that I, the customer, have received a copy of Equal Opportunity is the Law:

Signature

Date

LA IGUALDAD DE OPORTUNIDAD ES LA LEY

La ley prohíbe que este beneficiario de asistencia financiera federal discrimine por los siguientes motivos: contra cualquier individuo en los Estados Unidos por su raza, color, religión, sexo

(incluyendo el embarazo, el parto y las condiciones médicas relacionadas, y los estereotipos sexuales, el estatus transgénero y la identidad de género), origen nacional (incluyendo el dominio limitado del

inglés), edad, discapacidad, afiliación o creencia política, o contra cualquier beneficiario, solicitante de

trabajo o participante en programas de capacitación que reciben apoyo financiero bajo el Título I de

la ley de Innovación y Oportunidad en la Fuerza Laboral (WIOA, por sus siglas en inglés), debido a su ciudadanía, o por su participación en un programa o actividad que recibe asistencia financiera bajo el Título I de WIOA.

El beneficiario no deberá discriminar en los siguientes áreas: decidiendo quién será permitido de participar, o tendrá acceso a cualquier programa o actividad que recibe apoyo financiero bajo el Título I de WIOA; proporcionando oportunidades en, o tratar a cualquier persona con respecto a un programa o actividad semejante; o tomar decisiones de empleo en la administración de, o en conexión a un programa o actividad semejante.

Los beneficiarios de asistencia financiera federal deben tomar medidas razonables para garantizar que las comunicaciones con las personas con discapacidades sean tan efectivas como las comunicaciones con los demás. Esto significa que, a petición y sin costo alguno para el individuo, los recipientes están obligados a proporcionar ayuda auxiliar y servicios para individuos con discapacidades calificados.

QUE DEBE HACER SI CREE QUE HA SIDO DISCRIMINADO

Si usted piensa que ha sido discriminado en un programa o actividad que recibe apoyo financiero bajo el Título I de WIOA, usted puede presentar una queja no más de 180 días después de la fecha en que ocurrió la presunta violación, ya sea con: El oficial de igualdad de oportunidad del recipiente

Equal Opportunity Officer:

Daniel Schneckenburger

P O Box 8, Wye Mills, MD 21679

Telephone (410) 822-1716 ext 2271

Email: dschneckenburger@chesapeake.edu

OR

Director, Civil Rights Center (CRC), U.S. Department of Labor 200 Constitution Avenue NW, Room N-4123, Washington, DC 20210 o electrónicamente como indica el sitio web del CRC www.dol.gov/crc. Si usted presenta una queja con el recipiente, usted debe esperar hasta que el recipiente emita una decisión final escrita o que pasen por lo menos 90 días (lo que ocurra primero), antes de presentar una queja con el Centro de Derechos Civiles (CRC, por sus siglas en inglés) a la dirección mencionada previamente. Si el beneficiario no le entrega una decisión final escrita dentro de 90 días después de la fecha en que presento su queja, usted puede presentar su queja con el CRC antes que reciba la decisión final. Sin embargo, es necesario presentar

su queja con el CRC dentro de 30 días después de la fecha límite de 90 días (en otras palabras, dentro de 120 días después de la fecha en presento la queja con el recipiente). Si el recipiente emite una decisión final escrita, pero usted no está satisfecho con él resultado o resolución, usted puede presentar una queja con el CRC. Usted debe presentar su queja con el CRC dentro de 30 días después que reciba la decisión final escrita.

Reconozco que, al cliente, he recibido una copia de la igualdad de oportunidades

es laey: Signature

Date

Equal Opportunity EEO



Upper Shore Workforce Investment Board Equal Opportunity Plan

Purpose:

The purpose of the Equal Opportunity Plan is to communicate to employees, job applicants, USWIB WIOA Participants, State and federal regulatory agencies, and members of the public, the agency's commitment to providing a work and customer environment free from discrimination, harassment, intimidation, coercion, and retaliation, as prohibited by law. The USWIB is establishing this plan to clearly articulate the board's policies in compliance with WIOA Section 188.

Policy Statement:

It is the continuing policy of the USWIB to comply with all applicable Federal and State laws prohibiting employment discrimination and to provide equal opportunity to all employees and applicants for employment without regard to age, ancestry, color, creed, gender identity and expression, genetic information, marital status, mental or physical disability, national origin, race, religious affiliation (belief or opinion), sex, sexual orientation or any other protected status. The law also makes it illegal to retaliate against a person because the person complained about discrimination, filed a charge of discrimination, or participated in an employment discrimination investigation or lawsuit. Participation in a complaint process is protected from retaliation under all circumstances. Other acts to oppose discrimination are protected as long as the employee was acting on a reasonable belief that something in the workplace may violate EEO laws. In addition, USWIB is the non-profit entity charged with planning, implementing and delivering Title I WIOA Programs and Services within the Upper Shore WIOA Area. The USWIB is dedicated to the provision of services, outreach and partner collaboration that comply with WIOA Section 188. USWIB and its partners adhere to all applicable Federal and State laws prohibiting discrimination in employment and program service delivery including but not limited to:

- **Section 188 of WIOA which prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency (LEP)), age, disability, or political affiliation or belief, or for the beneficiaries, applicants, and participants only, on the basis of citizenship status, or participation in a program or activity that receives financial assistance under Title I of WIOA;**

- **Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the basis of race, color, and national origin (including LEP);**
- **Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities;**
- **The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age;**
- **Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs; and,**
- **29 CFR Part 38 - IMPLEMENTATION OF THE NONDISCRIMINATION AND EQUAL OPPORTUNITY PROVISIONS OF THE WORKFORCE INNOVATION AND OPPORTUNITY ACT**
- **Title I of the ADA, which prohibits discrimination in employment based on disability.**
- **Title II of the ADA, which prohibits State and local governments from discriminating based on disability.**
- **Section 427 of the General Education Provisions Act;**
- **Maryland Anti-Discrimination laws, including 5 Md. STATE GOVERNMENT Code Ann. §10-1101, which stipulates that oral language services must be delivered on-site for those in frequent contact with a service provider**

USWIB is committed to promoting the full realization of equal opportunity, which aims to eliminate discrimination based on factors, which are irrelevant to job performance or program eligibility. Every effort will be made to ensure that all employment decisions, personnel actions and program eligibility are administered in conformance with State and Federal statutes and regulations governing equal employment and WIOA Program Eligibility, including (but not limited to) recruitment, selection, training, promotion, transfer, termination, and other benefits related to employment and WIOA Services. This commitment must be an integral part of every aspect of USWIB personnel policy and equal opportunity compliance with WIOA Section 188.

USWIB Equal Opportunity Officer is responsible for ensuring that full cooperation is provided by all agency employees in the processing and resolution of complaint matters and investigations within the agency.

**USWIB EOO Designee: LWIOA Section 188 Compliance Umbrella Coordinator
EOO LWDB, WIOA TITLE I,**

USWIB Executive Director/Local EOO

Upper Shore Workforce Development Board at Chesapeake College

P.O. Box 8, Wye Mills, Maryland 21679

410-822-1716

<https://www.uswib.org>

Partner EOO Designees & Referral Contacts are:

Title III Wagner-Peyser, Trade Act, Jobs for Veterans State Grant, Migrant and Seasonal Farmworkers, Unemployment Insurance

Service Agency - Maryland Department of Labor

Local Director

Labor Exchange Administrator

Department of Labor

Upper Shore One-Stop Career Centers

301 Bay Street, Suite 301, Easton, MD 21601

410-822-3030

dlwdaleastonisoffice-LABOR@marvland.gov

Statewide MD-Labor Coordinator

Yvette Dickens, EEO Director & ADA/504 Officer

Office of Fair Practices (OFP)

1100 North Eutaw Street, Room 613, Baltimore, Maryland 21201

Phone: 410-230-6319

Fax: 410-225-3282

Maryland Relay 7-1-1

Yvette.dickens@maryland.gov

<https://www.uswib.org>

TITLE IV Rehabilitation Act of 1973, Amended -

Service Agency- Division of Rehabilitation Services (DORS)

Local Contact - Caroline, Dorchester, Queen Anne's & Talbot

8737 Brooks Drive, Easton, MD 21601

Fax: 410-819-6840

Easton.dors@maryland.gov

Local Contact - Kent

Regional Administrator

10461 Mill Run Circle, Suite LL1, Owings Mills, Maryland 21117

Phone: 410-998-2040

Fax: 410-998-2063

region5.dors@maryland.gov

Statewide Contact

Equity Assurance and Compliance Office -

Office of the Deputy State Superintendent for Finance and Administration

Maryland State Department of Education

200 W. Baltimore Street - 6th Floor, Baltimore, Maryland 21201-2595

410-767-0433 -voice

410-767-0431- fax

<https://dors.maryland.gov/consumers/Pages/about.aspx>.

Title II - ABE, ASE, ESOL, Perkins Service Agency - Chesapeake College Local Contact

Director of Human Resources

1000 College Circle, Wye Mills, MD 21679

Dorchester Administration Building

Phone: 410-827-5811

scianchetta@chesapeake.edu

Social Security Act Part A TITLE IV- TANF

Service Agency- County-based Department of Human Services

Caroline County- Local Contact

Director

207 South Third Street, Denton, Maryland 21629

Phone: 410-819-4500

Fax: 410-819-4501

<https://dhs.maryland.gov/local-offices/caroline-county/>

Dorchester County - Local Contact

Director

627 Race Street, Cambridge, Maryland 21613

Phone: 410-901-4100

Fax Numbers: 410-901-1121

<https://dhs.maryland.gov/local-offices/dorchester-county/>

Kent County - Local Contact

Director
350 High Street/P.O. Box 670, Chestertown, MD 21620
Phone: 410-810-7600
Fax: 410-778-1497
<https://dhs.mar/land.gov/local-offices/kent-county/>

Queen Anne's County- Local Contact

Director
Department of Human Services
Queen Anne's County Department of Social Services
125 Comet Drive, Centreville, MD 21617
Phone: 410-758-8000
Fax: 410-758-8110
<https://dhs.maryland.gov/local-offices/queen-annes-county/>

Talbot County- Local Contact

Director
301 Bay Street, Easton, Maryland 21601
Phone: 410-770-4848
Fax: 410-820-7117
<https://dhs.maryland.gov/local-offices/talbot-county/>

Statewide Coordinator

VACANT ADA Coordinator/EEO Compliance Officer
Department of Human Services
Office of Employment and Program Equity
311 West Saratoga Street, Suite 199, Baltimore, Md. 21201
Phone: 410 767- 7861
<https://dhs.maryland.gov/office-of-employment-and-program-equity/>

TITLE V of the Older Americans Act --SCSEP

MAC, Inc. Local Contact - MAC, Inc - Dorchester County Office

Executive Director
MAC, Inc., Area Agency on Aging
909 Progress Circle, Suite 100, Salisbury, MD 21804
410-742-0505
<https://macinc.org/contact-us/>

Local Contact - Caroline, Kent, Queen Anne's & Talbot Counties

Labor Exchange Administrator
Department of Labor
Upper Shore One-Stop Career Centers
301 Bay Street, Suite 301, Easton, MD 21601
410-822-3030
dlwdaleastonisoffice-LABOR@maryland.gov

Statewide MD-Labor Coordinator

Yvette Dickens, EEO Director & ADA/504 Officer
Office of Fair Practices (OFP)
1100 North Eutaw Street, Room 613, Baltimore, Maryland 21201
Phone: 410-230-6319
Fax: 410-225-3282
Maryland Relay 7-1-1
Yvette.dickens@maryland.gov

Community Services Block Grant Act**Maryland Rural Development Corporation - Caroline & Kent Counties**

Administrative Offices
Executive Director
101 Cedar Lane, Greensboro, MD 21639
410-482-2585 Ext. 233
info@mrdc.net

Delmarva Community Services - Dorchester County

Executive Director
Administrative Offices
2450 Cambridge Beltway, Cambridge, MD 21613
410-221-1900
www.dcsdct.org

SHORE UP! Inc. - Queen Anne's County

Administrative Offices
Executive Director
520 Snow Hill Road, Salisbury, MD 21804
410-749-1142

agency@shoreup.org

Neighborhood Services Center -Talbot County

Executive Director

Administrative Offices

126 Port Street, Easton, MD 21601

410-822-5015

www.nsctalbotmd.org

Statewide Coordinator

Department of Housing and Community Development

Office of Fair Practices

Office Director

7800 Harkins Road, Lanham, MD 20706

301-429-7400

www.dhcd.maryland.gov

The USWIB EOO Designee will, based on the complaint, make directed and documented referrals of complainants to the partner, service provider, employer or vendor responsible for the entity's EOO Compliance. Within this framework, the USWIB EOO Designee will take the role of facilitator, reporter, and informational resource coordinator with complaints that come under the compliance purview of the specific entity. In these situations, the USWIB EOO Designee will report the complaint, investigation and solution/decision outcome to the State and Federal WIOA Granters. The USWIB EOO Designee will monitor the adherence by partners, service providers, vendors and employers to their compliance under the MOU/Contract between the USWIB and said organization. However, the USWIB EOO Designee will not impose or require the entity at question with any policy or procedure that exceeds the WIOA Board's Charter and WIOA Compliance. In cases where the USWIB EOO Designee sees violations or perceived violations, the EOO Designee will share their concerns with the Statewide WIOA Section 188 Compliance EOO Designee Yvette Dickens, Maryland Civil Rights Commission and the Civil Rights Center for guidance, reporting and referral.

Managers and supervisors are responsible for ensuring that the USWIB adheres to the Federal and State policies related to fair and non-discriminatory employment practices, to equitable and non-discriminatory services delivered under the WIOA Act. In addition, managers and supervisors are responsible for cooperating with EEO and EOO officials in complaint matters and are expected to support the participation of their employees in EEO and EOO matters. It is

the policy of USWIB that all complaints of discrimination or other unfair employment and program practices be thoroughly investigated and promptly resolved, as appropriate. USWIB will assist and participate in any and all complaints that involve its staff, administrators or clients under Title I of WIOA.

The USWIB will foster a highly qualified and diverse workforce to support the Agency's mission. The USWIB's goal is to have a workforce that is reflective of our State and WIOA Local Area. USWIB is committed to offering client services without prejudice to any and all eligible individuals in the Upper Shore WIOA Area. We will develop and implement policies that promote equal employment opportunity and workforce diversification reflective of the availability of women, minorities, and persons with disabilities in the relevant labor market. USWIB will develop and implement programs, activities, and events to acknowledge and educate about diversity and cultural differences. The Upper Shore will ensure that program delivery does not discriminate based on age, race, national origin, sexual orientation or disability.

The USWIB Equal Opportunity Officer shall prepare any reports required with WIOA Section 188 Compliance. The report(s) will be submitted to the Statewide Equal Opportunity Coordinator, as designated by the Governor's Workforce Board and will document the degree to which the USWIB has directly engaged or provided oversight related to Upper Shore WIOA Title I Clients in any program discriminatory complaints. The reporting and oversight will include USWIB Title I Clients being referred to and receiving services from any WIOA partners, service providers, vendors or clients.

USWIB Board has a special arrangement that makes Chesapeake College the administrative entity on behalf of the Board's WIOA Administration. As mentioned earlier, Chesapeake College is the employer of record and fiscal administrator for the USWIB. With this special relationship, USWIB Administration and Staff are covered by employment policies and related Equal Employment Federal and State laws and regulations as approved by the Chesapeake College Administration.

Upper Shore Service Delivery

The Upper Shore WIOA Network covers the Five-County Area including Caroline, Dorchester, Kent, Queen Anne's, and Talbot Counties. The American Job Centers are housed in various location within the five counties.

Comprehensive Maryland Department of Labor

Talbot County- American Job Center Easton 301 Bay Street Suite 301 Easton, MD 21601

410-822-3030; <https://www.dllr.state.md.us/talbot-county/>

Satellite Offices

Department of Social Services - Caroline County

Caroline County-American Job Center Denton 300 Market Street, Suite 301, Denton, MD 21629, 410-819-4549; dlwdaldentonjsoffice-LABOR@maryland.gov

Upper Shore Scholarship Office

Dorchester County - American Job Center Cambridge 416-418 Race Street, Cambridge, MD 21613, 410-901-4250; Lwdalcambbridgejsoffice-LABOR@maryland.gov

Upper Shore Scholarship Office

Kent County - American Job Center Chestertown 115 South Lynchburg Street, Chestertown, MD 21620, 410-778-3525; Lwdalchestertownjsoffice-LABOR@maryland.gov

Department of Social Services - Queen Ann's County

Queen Anne's County-American Job Center Centreville 125 Comet Drive, Centreville, MD 21617, 410-820-9966; dlwdalcentreville-LABOR@maryland.gov

The American Job Center Partners link employment and training system services, including WIOA and other community resources, to persons with disabilities by ensuring that all workforce offices are ADA compliant and that auxiliary aids are made available when requested by customers receiving services. The American Job Center Partners distribute and post required notices to ensure all eligible registrants and applicants are aware of the system's obligations to operate programs in a non-discriminatory manner.

Chesapeake College Employment Personnel Policies related to EEO and EOO are listed below as retrieved from the Chesapeake College Faculty and Staff Handbook. USWIB is placing these policies within its EO Plan to further codify and clarify the arrangement with Chesapeake College. These policies are listed as the standards that employees, administrators, customers and associates must abide by as part of the Chesapeake College Community.

Equal Opportunity Employment Policy

Section:	7 – Human Resources	Page:	1 of 2
Subject:	Equal Opportunity Employment Policy	Date:	4/24/2015
Contact:	Director of Human Resources	Rev:	9/24/2020

Chesapeake College is committed to a policy of equal opportunity for all persons so that no person, on the basis of race, color, religion, creed, age, national origin, ancestry, sex, gender identity, marital status, genetic information, disability, pregnancy, military status, sexual orientation, or any other class protected by law, shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity of this college. Under this policy, this college will not discriminate against any person on the grounds of race, color, religion, creed, age, national origin, ancestry, sex, gender identity, marital status, genetic information, disability, pregnancy, military status, sexual orientation, or any other class protected by law, in its admission policies and practices of the college relating to the treatment of students or other people in employment, the providing of services, financial aid, and other benefits and including the use of any building, structure, room, materials, equipment, facilities, or any other property.

Chesapeake College, as a recipient of federal financial assistance, is required by Title IX of the Education Amendments of 1972, as amended, not to discriminate on the basis of sex in the educational programs or activities that it operates. Chesapeake College is also covered by and complies with Title VI and Title VII of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color or national origin, the Americans with Disabilities Act of 1990 and the Rehabilitation Act of 1975, both of which prohibit discrimination on the basis of disability. The college is also covered by federal and state laws prohibiting discrimination in employment. The Director of Human Resources serves as the college's Equal Opportunity Officer, and is the designated compliance officer under Title VI, Title VII, Title IX, Section 504 and ADA Title II.

Any person who believes he/she has been subjected to any form of prohibited discrimination, including violations of any of these laws, may file a complaint of discrimination with the Director of Human Resources. Copies of the complaint procedure will be provided on request. All complaints will be investigated by the college, and if a violation is found, prompt corrective action will be taken. Persons dissatisfied with the results may appeal to the college President.

To ensure the implementation of this policy, Chesapeake College's Board of Trustees, administration, faculty, and staff have approved the following positive action procedures and goals:

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- A. The college does and will continue to seek women and members of minority groups for all job openings. Job announcements will contain the college's Affirmative Action Statement. Job openings will be fully publicized in various types of media.

- B. The college does and will continue to ensure that job qualifications are stated in such a manner that there are no barriers to full opportunity to application.
- C. The college does and will continue to provide equal promotional opportunities for women and members of minority groups.
- D. The college does and will continue to maintain the same salary scales for job levels for all employees.
- E. The college does and will continue to provide equal employee benefits and conditions of employment for all employees.
- F. The college does and will continue to recruit actively and to admit students to all curriculums regardless of race, color, religion, creed, age, national origin, ancestry, sex, gender identity, marital status, genetic information, disability, pregnancy, military status, sexual orientation, or any other class protected by law. All requests for medical, pregnancy, childbirth, and parental leaves of absences will be processed in accordance and comply with the Federal Family Medical Leave Act.
- G. The college does and will continue to encourage the development of academic studies in areas that emphasize the role and status of women and minority groups.
- H. The college does and will continue to provide opportunities for upgrading faculty and staff with equal consideration for women and minority groups.
- I. The college does and will continue to make determined efforts to include women and minority groups in the membership of campus committees and task forces.

Harassment and Bullying Policy

Section:	7-- Human Resources	Page: 1 of 4
Subject:	Harassment and Bullying Policy	Date: 10/22/2015
Contact:	Director of Human Resources	Rev: 9/24/2020

It is the policy of Chesapeake College to promote a productive work environment and not to tolerate verbal or physical conduct by any employee that harasses, disrupts or interferes with another's work performance or that creates an intimidating, offensive, bullying or hostile environment.

Harassment:

1. Employees are expected to maintain a productive work environment that is free from harassing or disruptive activity. No form of harassment will be tolerated, including harassment for the following reasons: race, color, religion, creed, age, national origin, ancestry, sex, gender identity, marital status, genetic information, disability, pregnancy, military status, sexual orientation, or any other class protected by law. Special attention should be paid to the prohibition of sexual harassment.

2. Each supervisor and manager has a responsibility to keep the workplace free of any form of harassment, and in particular, sexual harassment. No supervisor or manager is to threaten or insinuate, explicitly or implicitly, that an employee's refusal or willingness to submit to sexual advances will affect the employee's terms or conditions of employment.
3. Other sexually harassing or offensive conduct in the workplace, whether committed by supervisors, managers, nonsupervisory employees, students, vendors, suppliers, third parties or anyone under college control, also is prohibited. This conduct includes:
 - a. Unwanted physical contact or conduct of any kind, including sexual flirtations, touching, advances, or propositions;
 - b. Verbal harassment of a sexual nature, such as lewd comments, sexual jokes or references, and offensive personal references;
 - c. Demeaning, insulting, intimidating, or sexually suggestive comments about an individual;
 - d. The display in the workplace of demeaning, insulting, intimidating, or sexually suggestive objects, pictures, or photographs;
 - e. Demeaning, insulting, intimidating, or sexually suggestive written, recorded, or electronically transmitted messages (such as email, instant messaging, and Internet materials).

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- f. Negative stereotyping based upon one's gender, gender identity, or sexual orientation.

Any of the above conduct, or other offensive conduct, directed at individuals because of their race, color, religion, creed, age, national origin, ancestry, sex, gender identity, marital status, genetic information, disability, pregnancy, military status, sexual orientation, or any other class protected by law also is prohibited.

These types of behaviors are unacceptable on Chesapeake College campuses, in other work settings such as college business trips and at college-related social and athletic events. All college employees and particularly managers have a responsibility for keeping the work environment free of harassment.

4. Chesapeake College must be made aware of the discrimination or harassment before it can act to prevent or stop it. The college cannot take corrective action unless it has knowledge that a problem exists. Any incident or situation that an employee or individual under the college's control experiences should be brought to the attention of the employee's supervisor, the supervisor's supervisor, or Human Resources within 30 days of the incident or situation. It is also recommended, but not required, that an employee

firmly and promptly notify the offender that his/her behavior is unwelcome. Any supervisor or manager who becomes aware of any possible discrimination or harassment should immediately advise Human Resources, regardless of whether the employee who has the complaint wants the supervisor/manager to do so.

5. Any individual who is accused of harassment by others, including other employees or students, will be given due process under existing college policies.
6. If an employee makes the college aware of a complaint of discrimination or harassment, Chesapeake College is obligated by law to investigate and, if appropriate, take prompt remedial action. For this reason, if a complaint of discrimination or harassment is brought to our attention, we will investigate, regardless of whether the employee who brought forward the complaint wants the college to do so. Chesapeake College will promptly and thoroughly investigate the facts and circumstances of any claim of harassment and will do its best to maintain the confidentiality of the complaint and the complaining employee to the extent practical and appropriate under the circumstances.

7. Any employee, supervisor, or manager who is found to have violated the harassment policy will be subject to appropriate disciplinary action, up to and including termination. The college prohibits any form of retaliation against employees for bringing bona fide complaints or providing information about harassment. Retaliation is a serious violation of this policy, and any retaliation should be reported immediately. Any person found to have retaliated against another individual for reporting harassment will be subject to disciplinary action, up to and including termination. Any individual who intentionally makes a false claim of discrimination or harassment is subject to discipline, up to and including termination.

Bullying Behavior:

Bullying behavior is often persistent and part of a pattern, but it can also occur as a single incident. It is usually carried out by an individual but can also be an aspect of group behavior.

Examples include:

- Abusive and offensive language
- Insults
- Teasing
- Spreading rumors or innuendos
- Unreasonable criticism
- Trivializing work and achievements
- Excessive demands

- Setting impossible deadlines
 - Unfairly blaming for mistakes
 - Excessive supervision
 - Setting people up for failure
 - Deliberate exclusion
 - Criticizing in public
 - Belittling or disregarding opinions or suggestions
1. Bullying is unacceptable behavior that breaches principles of equality and fairness and frequently represents an abuse of power and authority.
 2. Employees have a responsibility to conduct themselves in a manner which ensures the proper performance of their job responsibilities and maintains co• worker and student confidence.
 3. It is recommended, but not required, that an employee who experiences bullying should clearly state to the alleged bully that his/her behavior is offensive to them, and request that such behavior stop.

4. Chesapeake College must be made aware of the bullying before it can act to prevent or stop it. The college cannot take corrective action unless it has knowledge that a problem exists. Any incident or situation that an employee or individual under the college's control experiences should be brought to the attention of the employee's supervisor, the supervisor's supervisor, or Human Resources within 30 days of the incident or situation.
5. Any supervisor who receives a report or who has knowledge of bullying must immediately contact his/her department head and the Director of Human Resources. Any supervisor who has knowledge of such behavior yet takes no action to address it is also subject to disciplinary action.
6. Each complaint of bullying shall be fully investigated and a determination of appropriate response shall be made on a case-by-case basis.
 - a. Complaints will be treated confidentially to the extent possible for a thorough investigation and resolution.
 - b. Individuals involved in an investigation shall be treated professionally and shall not be subjected to retaliation in any form. Any individual who is accused of bullying by others, including other employees or students, will be given due process under existing college policies.
7. Any employee, supervisor, or manager who is found to have violated the bullying policy will be subject to appropriate disciplinary action, up to and including termination. The

college prohibits any form of retaliation against employees for bringing bona fide complaints or providing information about bullying. Retaliation is a serious violation of this policy, and any retaliation also should be reported immediately. Any person found to have retaliated against another individual for reporting bullying will be subject to disciplinary action, up to and including termination. Any individual who intentionally makes a false claim of bullying is subject to discipline, up to and including termination.

8. Bullying is considered a form of employee misconduct. Disciplinary action up to and including termination shall be taken against any employee engaging in this type of behavior.

Questions regarding this policy, or its application to any situation, should be referred to Human Resources.

Based on the administrative and operational agreements any and all employee/employer related actions involving these two policies fall under the compliant and appeal purview of the Chesapeake College Office of Human Resources. Inserted below is a third policy that speaks to Workplace Complaints and the process for filing and handling a complaint by Chesapeake College's HR Office.

Workplace Harassment/Discrimination Complaints

Section:	7-- Human Resources	Page:	1 of 4
Subject:	Workplace Harassment/Discrimination Complaints	Date:	7/1/2009
Contact:	Director of Human Resources	Rev:	7/1/2017

POLICY

- A. This policy addresses complaints that allege workplace harassment/discrimination on the basis of race, color, religion, creed, age, national origin, ancestry, sex/gender, gender identity, marital status, genetic information, disability, pregnancy, military status, sexual orientation, or any other class protected by law. Harassment based on most of these characteristics is a prohibited form of discrimination under federal or state law and is a violation of college policy. Every employee and student will be subject to disciplinary action for violation of this policy.
- B. College policy as well as federal and/or state law prohibit discrimination on any of the above mentioned characteristics with respect to the following:
 1. Employment including hiring, promotion, discharge or terms, conditions and privileges of employment.
 2. Academic matters including grading and recommendations.
 3. Participation in or access to programs or services of the college.

- C. The Director of Human Resources has overall responsibility for assuring college compliance with non-discrimination laws and regulations.
- D. The President of the college has the overall responsibility for approving any recommendations for disciplinary action based on the findings of the investigative process. The person so disciplined shall not have any other mechanisms for appeal or review of the President's decision.

PURPOSE

- A. This policy is intended to provide a mechanism for complaints of all forms of unlawful discrimination or harassment. Examples of prohibited conduct include, but are not limited to:
 - 1. The use of protected characteristics as a negative factor in admissions, hiring or promotion.
 - 2. The refusal to make reasonable accommodations, academic adjustments, provide auxiliary aids or services, modify policies and procedures or remove barriers for an otherwise qualified person with a disability when needed in the classroom, in employment or in access to other programs and services of the college.

- 3. The use of racial epithets or slurs directed at a member of a particular group.
 - 4. Workplace harassment.
- B. This complaint procedure is available and applicable to any person who, at the time of the acts complained of, was a member of the college community, a vendor, supplier or any third party under college control.
- C. This policy protects and provides a mechanism for investigation of complaints by all protected individuals, regardless of the position or status of the person who is alleged to have engaged in discrimination or harassment. This policy applies to claims by students against other students, faculty or staff; by users of college services against members of the college community, including students, faculty and staff; and complaints by faculty and staff against others, including students and vendors.
- D. This policy affirms the college's vital commitment to academic freedom. The college recognizes that there may be situations when verbal statements or other forms of expression or conduct are the subject of a complaint, and the prohibitions of discrimination or harassment under this policy or federal law might appear to be in conflict with traditional notions of academic freedom. The purpose of this policy is not to control the content of speech or academic material. The courts, federal agencies and the college recognize that the academic setting presents unique issues not present in the

typical workplace, and that an integral part of the educational process is to expose students to new and controversial ideas.

- E. This complaint procedure is internal to the college. An aggrieved party may also have rights to file a complaint of discrimination/harassment with the appropriate federal or state agency.

PROCEDURE

- A. In conducting investigations and assessing discipline, the college will be guided by the principles of applicable federal and state law. Conduct that violates Title VII, Title IX, the ADA or other laws will always be deemed to violate college policy. Depending upon the severity of the conduct and the circumstances, the discipline for such conduct could include discharge or expulsion.
- B. Chesapeake College must be made aware of the discrimination or harassment before it can act to prevent or stop it. The college cannot take corrective action unless it has knowledge the problem exists. Any incident or situation should be brought to the attention of the individual's

supervisor, the supervisor's supervisor, and the Director of Human Resources within 30 days of the incident or situation. Complaints by students should be brought to the Vice President for Workforce and Academic Programs or the Director of Human Resources. It is also recommended, but not required, that an employee firmly and promptly notify the offender that his or her behavior is unwelcome. Any supervisor or manager who becomes aware of any possible discrimination or harassment should immediately advise Human Resources, regardless of whether the employee who has brought forth the complaint wants the supervisor or manager to do so.

- C. If a member of the college community makes the college aware of a complaint of discrimination or harassment, Chesapeake College is obligated by law to investigate and, if appropriate, take prompt remedial action. For this reason, if a complaint of discrimination or harassment is brought to our attention, we will investigate, regardless of whether or not the individual who brought forward the complaint wants the college to do so. Chesapeake College will promptly and thoroughly investigate the facts and circumstances of any claim of harassment and will do its best to maintain the confidentiality of the complaint and the complaining employee to the extent practical and appropriate under the circumstances.

- D. This is a non-adversarial process. Respondents will be advised of the allegations, but there will be no formal hearing or cross-examination. Complainants and respondents may name witnesses who will be interviewed privately. A complainant or respondent may have another member of the campus community present during their interviews. Outsiders, including attorneys have no standing in this process.
- E. All members of the college community as a condition of that membership are expected to cooperate fully.
- F. A formal investigation can be terminated at any time if a satisfactory resolution is agreed to before a written finding is made.
- G. All investigation findings and recommendations will be reviewed and approved by the VP for Administrative Services. The Director of Human Resources will notify the complainant, respondent and relevant vice president(s) in writing of the findings and recommendations within ten (10) days of the investigative report.
- H. If the respondent is found to be guilty, disciplinary action will be taken and may include, but not be limited to: counseling, oral/written warnings, reprimands, suspension, demotion, expulsion or termination.
- I. Respondents or complainants dissatisfied with the outcome of the investigation may submit a written appeal of the decision to the

USWIB includes the three above policies from the Chesapeake College Faculty and Staff Handbook for reference to the partnership that is addressed in the cooperative agreement with USWIB. These three policies address specific affirmative standards for non-discriminatory behavior. The policies speak to appropriate and inappropriate behavior that determines employee adherence to the college's policies and any & all local, state and federal legal standards. USWIB will incorporate these policies into any guide or training resource for USWIB Staff and Administration.

III. Complaint Procedure

An employee, applicant for employment, WIOA Client may file a complaint of discrimination with the head of the principal unit, fair practices officer, or equal employment opportunity officer.

- 1) WIOA Section 188 Complaints must be filed within thirty (30) days after first knowing or reasonably knowing of the alleged violation.
- 2) The complaint must be made in writing to the USWIB EOO Designee.
- 3) Within thirty (30) days, the EOO Officer shall investigate the complaint and recommend a proposed decision to the head of the principal unit. The full investigation and proposed decision by the USWIB EOO Designee will be responsible for the entire process related to WIOA Title I Clients formally participating within the USWIB WIOA organization.

- 4) The USWIB EOO Designee shall issue a written decision to the Complainant and may grant an appropriate relief. Again, the USWIB WIOA EOO designee will be responsible for the written report for complaints directly impacting Registered WIOA Title I Participants that have filed complaints directed against the USWIB.

Under WIOA Section 188 Compliance the local WIOA Board and their EOO Designee is required to coordinate and collaborate with all the partners, one-stop operator, service providers, vendors and employers in the delivery of services. Within this organizational structure, the USWIB EOO Designee will be responsible for reporting any and all EOO Complaints filed against the partners, service providers, vendors, one-stop operator, employers, etc. where the complaint impacts an individual enrolled and participating as an eligible WIOA Title I Participant through USWIB Workforce Services. In this section of the plan's Complaint Procedures, the role and responsibilities of the USWIB Board and Administration will be clarified.

Shared responsibility between the Chesapeake College Human Resource Office and USWIB Executive Director are defined in two key areas.

Human Resource Equal Employment Compliance would be shared when a staff employee and/or USWIB Executive Director are part of an action that is defined as a labor law or EEO/ EOO Complaint. Under this situation the complaint would be filed with the EEO Officer designated by the college. It is important that information and acknowledgement of the issue is shared between the parties at Chesapeake Human Resources and USWIB Administration. In-turn, the USWIB will need to be advised of the issue, complaint and recommended solutions in order to approve any by-law or board action that requires their approval.

Section 188 Program Compliance would be shared in situations where the WIOA 188 Compliance Complaint is involving USWIB WIOA Staff that have directly violated or have been designated by the complainant in the formal written complaint. The College HR/EEO designee may be engaged based on any violations that would require corrective action, disciplinary action up to termination of the employee referenced in any written complaint. If the issue is a situation that is mitigated to an affirmative resolution prior to a formal complaint employee disciplinary action may not play a role. Additionally, College-USWIB Title I participants may have complaints that focus on EOO and centered on delivery of services by the college or staff. Based on the USWIB WIOA Compliance responsibilities, shared engagement in the handling of and reporting of any complaints, regulatory or legal violations and determined resolution will need to be shared for State and Federal reporting purposes beyond the normal channels to include the State and Federal WIOA Section 188 requirements.

External compliance related to Partners, Job Seekers, Employers, Service Providers and Vendors

Partners have a special role in the WIOA System based on the designation by the Federal Law as referenced in **WIOA Public Law 113-128** designating specific federally funded programs engage as a required partner or another partner. In addition, the Governor makes the State and Local Partner Designations via the Governor's WIOA Board and in-turn the local designated partners.

Partners share in the delivery of services and collaboration in the framing of the local plan. All designated Partners are signatories to the local WIOA Plan and therefore required to support WIOA Section 188 Compliance. Under the local plan sharing participant data and outcomes is required. In the area of EEO and EOO Compliance, Partners will have shared responsibility on keeping the USWIB Board and USWIB WIOA EOO Designee informed of complaints received from any WIOA Title I Participant. In-turn the USWIB WIOA Administration and Staff will need to track and report to the WIOA State EOO Coordinator all aspects of the specific case. At the minimum, partners will be requested to provide copies and summary material on the complaint, findings, any resolution and any appeals. This information along with any reporting by the responsible partner will be used to demonstrate WIOA Section 188 Compliance. The designated Partner will be the primary concerning responsibility, resolution and appeal. The USWIB WIOA EOO Designee will be engaged for compliance reporting only. The USWIB WIOA EOO Designee will be the resource and point of contact related to questions, issues or procedural advice related to WIOA Section 188 Compliance and the Statewide WIOA Compliance Coordinator.

Service Providers and Vendors, as procured by the USWIB and in compliance with WIOA Section 188 will be monitored and evaluated based on their performance and adherence to WIOA Section 188. Service Providers and Vendors that violate these EEO Standards will be directly responsible for the complaint, investigation, solution and appeal process. This complaint process will enable and engage the USWIB to provide resources, facilitation and monitoring of any complaint against a service provider or vendor employing, servicing or training of any Active WIOA Title I Participant up to exiting and the follow-up timeframe. Based on the specific situation, the USWIB will provide direction, counseling, advocacy and facilitation to positively resolve the complaint issue. In addition, corrective action will be taken as required. The corrective action could include contract termination with the service provider/vendor based on the outcome and systemic pattern of the complaint issues. Vendors are considered any entity contracted by USWIB or Chesapeake College that provides direct services to any and all USWIB WIOA Title I Participants, as necessary, USWIB will collaborate and coordinate its response to any Vendor based complaint that requires attention of the Chesapeake College EOO Officer.

Appeal Process

- 1) Within ten (10) days after receiving a decision, a Complainant may appeal the decision in writing to the USWIB EEO Coordinator related to the WIOA Section 188 Compliance. Whereas the appeal is focused on any violation that is overseen by Chesapeake College Employee Policies, the appeal should be forwarded to or directly filed with the Chesapeake College EEO Coordinator.
- 2) Whereas the complaint is focused on WIOA Section 188 Compliance, the USWIB will share the written appeal with the State WIOA EEO Coordinator for consultation in rendering an appeal decision.
- 3) Within thirty (30) days after receiving an appeal, the coordinator shall review the complaint and the decision being appealed, conduct any necessary investigation, and determine if a violation has occurred.
- 4) If it is determined that a violation has not occurred, the complaint shall be dismissed, and the decision is final.
- 5) If it is determined that a violation has occurred, appropriate remedial action shall be taken.

Limitations & Special Notation

USWIB limits its responsibility to protection for Active WIOA Title I Participants. USWIB is not imposing any policies, procedures or legal requirements that go beyond the scope of WIOA Title I Section 188 Compliance. USWIB will not impose resolutions that infringe on the partner, service provider, or vendor organizational independence. However, the USWIB EEO Designee will report out any and all decisions to the State and Federal WIOA Section 188 Coordinators. In rare cases where complaints and solutions fall outside WIOA Section 188 Compliance, USWIB EEO Designee will refer complainants to designated State or Federal EEO or EEO Agencies. Where questions of responsibility may be unclear, the USWIB EEO Designee will confer with the State WIOA Section 188 Compliance Coordinator.

Election Procedure

As part of its distribution of resource information related WIOA Section 188 Compliance, USWIB Administration and Staff will offer options for filing directly with Partners, Maryland Civil Rights Commission or US DOL Civil Rights Center. However, USWIB will monitor and report on any and all activities that impact active WIOA Title I Participants and USWIB Administration and Staff.

IV. Workforce Analysis

The Chesapeake College is the employer of record and maintains all the requirements for employee and college workforce statistics. Therefore, USWIB defers to any internal workforce analysis produced by Chesapeake College Human Resources and the Chesapeake College

EEO Coordinator. This analysis would include the College's workforce analysis that compares the Chesapeake workforce versus the USWIOA Area.

V. Program Objectives and Implementation

Training and Development

Chesapeake College provides training of each new employee and the annual training of each current employee as required in our EEO plan. Each employee is required to go through various training components as part of their new employee orientation. New Employees are trained at the employee orientation in the following areas: Equal Opportunity Training, Non-Discrimination Training, Title IX Policy Training, these components include training on recognizing sexual harassment, employment discrimination, bullying and processes for reporting issues that violate these affirmative policies and legal requirements.

USWIB complies with mandated trainings as established by law.

USWIB provides leadership and training to managers, supervisors, and staff employees in Non-Discrimination, Equity, Diversity and Inclusion.

Diversity and Inclusion

Planned activities toward completion of EEO diversity and inclusion goals	Targeted date
Understanding and Defining Diversity and Inclusion	TBA
The Importance of Diversity and Inclusion in the Workplace	TBA
Types of Diversity and Inclusion	TBA

USWIB has requested the USWIB EEO Designee to explore areas of training that will encourage a holistic understanding concerning Diversity and Inclusion. The training plan will be to accentuate the positives related to Diversity and Inclusion within the workplace. It will educate staff and administrators about what constitutes discriminatory thinking and actions. The training will be part of the regular professional development of USWIB Administrators and Staff.

Understanding and Defining Diversity and Inclusion -- the focus of this seminar will be to have an interactive discussion related to first defining the difference between Diversity and Inclusion. Fundamentally, **Diversity** is the varying traits that make each individual unique and representative of their particular racial, cultural, sexual, and other related unique traits that may include national origin, religious or spiritual connection along with sexual orientation.

Inclusion is the acceptance of these same diverse individuals into the larger or greater society through an equitable and welcoming manner. The essence of this discussion and training component will be to encourage and solidify this viewpoint within USWIB's organization. USWIB wants to ensure the development of an inclusive and diverse atmosphere through this training and build it with additional activities and exercises.

The Importance of Diversity and Inclusion in the Workplace- the focus of this component will demonstrate the advantages of having diversity in the organization and working operation structure. The critical and creative thinking that is attributable to individuals of different backgrounds and cultural reference aids with problem-solving. Placing an equitable and welcoming atmosphere entails open and responsive communication at all levels and cross workforce disciplines. This training needs to be provided to leadership and staff in order to ensure the implementation of a diverse and inclusive workplace.

Types of Diversity and Inclusion -with the WIOA enactment, local areas are charged with removing any and all barriers that inhibit diversity and inclusion. From WIA to WIOA greater emphasis is placed on closer partnerships that engage directly with all job seekers. Incorporating Title-IV Vocational Rehabilitation into WIOA along with Adult Education Programs presses the strategy for inclusion of disabled job seekers and workers into the mainstream of career development and employment sustainability.

USWIB is setting a number of goals to engage its Vocational Rehabilitation Partner in expanding and maximizing their input within all the partners service process. USWIB is engaging the local representatives of the Maryland Department of Education, Division of Rehabilitative Services (DORS) in developing a more holistic approach to building careers and developing skills of disabled job seekers. This strategy will be used to breakdown barriers, remove obstacles and deliver services, as those received by the larger job seeker population. Essentially, this plan and USWIB's Board are seeking to make universal access available through an unencumbered local system.

Understanding the Local Need- USWIB is going to have all the partners begin exploring ways to determine the current system's gaps that impact serving disabled job seekers. With this evaluation, local DORS Administrators will be taking a more central role with the board and USWIB Administration to determine strengths and weaknesses in the current environment. Along with the DORS Administrators, other stakeholders in the disability community will be queued for feedback and recommendations related to the local AJC infrastructure and services.

This strategy should provide the initial steps toward the development of initiatives and committee structures that will focus on universal access.

Marketing and Outreach - USWIB will be exploring its current marketing and outreach methods to ensure that universal access and disabled job seekers are part of the strategy. The marketing and outreach will explore efforts that directly draw disabled job seekers into the AJC System. Building a community understanding through market materials and messaging of the AJC and its focus on all interested job seekers is key. In this case, the partners will need to look at the current gaps in messaging and collaboration of stakeholders to adapt a more focused connection to disabled job seekers. Additionally, the business and employer communities will need to be approached with messaging that promotes disabled job seekers. Making the disabled community part of the marketing and outreach development will assure that the correct messaging is developed. Uniformity of the message that shares disabled job seeker opportunities and the advantages of hiring them needs to become part of the endgame. It should aid with expanding usage of the AJC by the disabled community. It should help with encouraging employers to more readily consider job seeker candidates with the skills that happen to have a disability.

Disabled Community Engagement -- USWIB is seeking through its community needs assessment, marketing and outreach the expertise, support and partnership of disabled focused organizations and activists. The purpose to enlarge the community engagement will offer greater emphasis on universal access and collaborative opportunities. With this expanded engagement, USWIB will be better suited for system improvement and inclusive handling of disabled job seekers. From this access point, improvements in the system and staff training should be a by-product of the engagement. It should allow for an ongoing dialogue and action plan to develop and become sustainable.

Operational Collaboration and Enhanced Partnerships - USWIB will take steps that bring disability stakeholders into the day-to-day operations of the AJC System. The plan is to have disabled-focused stakeholders and partners playing a more active role in the determination of needs that assist with disabled job seeker inclusion and focus. The goal is to make their access going beyond ADA "lip-service" and make sure operational processes, policies and variables are inclusive for disabled job seekers. Revising policies and operational procedures to accommodate disabled job seekers that are considered the norm and seamless is the goal.

Staff Training- USWIB will have the Executive Director make sure that as the universal access team develops, so will staff training focused on ADA and related standards. The AJC System will approach the emphasis on routine access for disabled job seekers in the training components concerning universal access. USWIB, Partners and other organizational stakeholders will need to offer training and criteria for proper discussions and documentation related to individual customer disabilities. This training will need to include proper methods for inquiring about individual disabilities and the confidentiality methods for protecting and sharing

this personal information. Beyond normal screening, the training will need to provide the nuanced processes for handling recruitment, screening and career development related to disabled job seekers that is without malice, discrimination or in violation of ADA requirements.

AJC Services and Case Management - USWIB will place emphasis on evaluation and accommodation related to personalized case management, confidentiality and customized career planning. The administration, partners and staff will be focused on inclusion of disabled job seekers that positively impacts their career path and skills development. WIOA Services and access will be adjusted to meet the demands for providing superior service to disabled job seekers. This goal includes registration, assessment, testing, orientation, training services and recruitment. In addition, it will include follow-up services that enhance the successful transition to sustainable employment.

Reasonable Accommodation and Reasonable Modification -- USWIB will strive to make sure that wherever possible policies, procedures, and the cadre of WIOA/AJC deliverables will include personalized adjustments, as necessary and reasonable. USWIB will make use of best practices and guides provided through DEi to ensure the best options are available. It will include the recommendations and expertise offered by its partners and advocates for disabled job seekers. This inclusion will be part of the routine assessment and evaluation of services needed and barriers that may be improvised for successful delivery. When these standards prove difficult or prohibitive, USWIB will make sure every effort and accommodation has been made.

Appeal Process - USWIB will make sure that personalized adjustments are made that allow for an equitable appeal process. As with all the AJC services, reasonable accommodation and modification will be part of any analysis concerning the provision of an equitable appeal process.

Equal Opportunity and Non-Discrimination - USWIB will develop an atmosphere within the AJC System that prohibits discriminatory practices of the disabled job seeker. In this effort USWIB will ensure that the partners within the local system adhere to practices that provide universal access and reasonable accommodation as part of their responsibilities. USWIB is re-enforcing processes and limitations concerning any employer using the AJC that is discriminatory in their treatment and screening of protected workers including disabled job seekers. In this effort, the USWIB will assist disabled job seekers concerning discriminatory practices brought to their attention and directly related to WIOA/AC supported services. USWIB's advocacy will be geared toward any overt or passive practices that impede or dismiss the hiring of disabled job seekers.

Communication & Technology Alternatives - USWIB is prepared to seek and secure technology and strategies for providing equitable communication to hearing impaired and sight impaired job seekers. USWIB will explore alternative methods of communication, testing and assessment tools for the developmentally disabled job seeker engaging in the AJC System. These technology alternatives will be used to assist with service delivery for the mobility and speech impaired job seeker. Again, these alternatives will be provided based on reasonable accommodation, as defined by the ADA and related standards and guidance. These alternatives and enhancements will be provided as needed. In certain cases, these alternatives may become a routine part of the AJC Process.

Employees and Employers - USWIB will explore and augment its current recruitment and hiring practices to ensure inclusion of disabled job seekers. It will advocate for an environment to include diverse workers within its staff to align with all existing non-discrimination and equal opportunity legislation and acceptable standards. In this area, USWIB will ensure that the board, partners and other stakeholders abide by these legal and regulatory requirements as it relates to recruitment, services and hiring. USWIB along with MD-Labor will oversee that recruitment and hiring practices in use by its Job Order/Placement Employers are in alignment with ADA and related standards for disabled job seekers.

Minorities -- The USWIB is aware that minority job seekers have traditionally been hired at lower rates and lower wages. The inequity of hiring Blacks and Latinos at the same rates as Whites with similar education is a problem that still permeates workforce development nationwide. Although progress is being made seeing minorities hired into good paying jobs, the job growth in good jobs at good salaries is still dominated by Whites. Data shows that the earnings gap is \$550 billion in White earnings above their minority counterparts. The finding is from a recent study conducted by The Georgetown University Research into Workforce and Education. In all their findings, the research showed that good jobs and those opportunities were more likely to hire Whites over their minority counterparts. In some cases, the lack of education or credentials played a role. These imbalances are attributed to an educational opportunity imbalance. Although, good jobs have trended toward higher educational attainment and skills, the issue of job security imbalance is across the spectrum of Black and Latino employment.

The USWIB is planning to introduce strategies that reduce and mitigate racial imbalance in recruiting and hiring. USWIB is exploring proven strategies and practices that show promise in improving the placement of minorities in the local workforce. These strategies will be promoted for use by the partners, area employers and vendors.

USWIB will be evaluating the following items to improve impacts for equitable recruiting and hiring of minorities. In some cases, USWIB will customize best practices in ways that are suited for the local workforce and career pathway growth. The Partners will explore additional support

processes and services that nurture successful educational completion rates. Working with educational, mentoring and counseling partners that offer supportive services with moving minority graduation rates in line with those found in the majority population. Working with business services and the larger business community to reduce racial imbalance in career pathway opportunities. These business focused partners will include economic development, diversity promoting entities, AJC business services, educational and career counselors, and business associations. The goal here is to, as a collective group, examine ways that inhibit diversity and equitable career success and remove those barriers. The board and interested parties will need to determine whether committees, sub-committees or affinity groups are best suited to engage in this ongoing endeavor. Beyond this evaluation process, the AJC and its partnerships will require methods and mechanisms that implement the goals. Active teams will be necessary to consistently implement and evaluate success. Tracking success and making modifications will be part of the reporting provided to the board and administration for USWIB review and sharing.

Females - The USWIB is exploring the primary issues that impede women and girls from greater success in securing opportunities that lead to non-traditional higher wage employment. Initially, USWIB is preparing to investigate the impacts that are prohibitive to female educational success in securing a credential, associates and baccalaureate degrees. Overall, female students are far more likely to be care-givers within their family. In most cases, childcare is a critical obstacle that requires additional financial resources and flexibility. Although several programs are available to assist female students and parent students with childcare costs, these programs are underfunded or restrictive in their eligibility. USWIB, the partners, advocates and other stakeholders need to ascertain the gaps and limitations of these services locally. Exploring other factors will include mentoring, counseling and career pathway strategies that entice and support female entry into non-traditional higher wage employment. The focus of WIOA is to offer opportunities that lead to independent sustainable wage/benefited employment. In most single-parent households, adult females are the head of these households. Allowing for greater opportunities to non-traditional employment will require changing mind-set attitudes and restrictive thinking on the part of the counselors, mentors, and educators alike. To engage this effort will require a multipronged approach that nurtures this process for girls and women from K-12, Community College, Technical Schools and Four-Year Institutions. With resources being limited, the board and its administrative team will need to take a lead in seeking out additional resources. In addition, the board will request partners and advocates to assist with these efforts to gain greater funding and grant-based options to implement this comprehensive endeavor. In this effort to reduce the imbalance of female entry into non-traditional employment, USWIB will look at replicating successful efforts elsewhere. It will require greater collaboration with its training and educational partners along with mentoring employers to expand their own recruiting and hiring of female jobseekers.

Individuals with Disabilities - The USWIB is researching initiatives and pilot projects that have been structured toward mainstreaming disabled job seekers into the greater workforce. In our research and review, the USWIB has found resources that demonstrate strong partnerships have developed between employers, AJC Business Teams, and disability employment advocates. These project cooperatives have demonstrated, when given the opportunity, productive results in placing disabled job seekers in employment. By implementing a similar project, USWIB is prepared to experiment with customizing services and a collective atmosphere that engages employers, the AJC and the disability community in the Upper Shore.

The USWIB is engaging its Vocational Rehabilitation Partners, Disability Advocates and Title I Partners in developing a team concept that takes providing services to the next level for disabled job seekers. It will develop an affinity group or committee to build the strategy and process from these partners that builds the holistic service delivery needed for disabled job seekers. The group will explore and implement processes that make AJC recruitment, training, career development and placement a norm and not the exception. The focus will include the board, partners and greater employer community recognizing opportunities offered by hiring disabled job seekers with greater frequency and success. As staffing changes take place, the USWIB will make a proactive effort to recruit and hire qualified candidates that happen to be disabled job seekers.

OPERATIONAL PROTOCOLS

Complaint Form

USWIB has developed its own WIOA Non-Discrimination Form to provide an option for WIOA Title I Participants to utilize. The complaint form is based on the requirements provided by USDOL and MD-Labor. The complaint form will be digital and provided by link on the USWIB website. It will be provided for completion and delivery via a portal and sent directly to the USWIB EOO Designee and any staff designated by the USWIB EOO Designee. Along with the digital delivery, the USWIB will offer phone contact information allowing the complainant to speak with designated staff concerning questions related to completing the form.

Once the complaint form is completed, signed, and submitted, the USWIB EOO Designee will initiate investigatory action into the claim. The Complainant will be encouraged to print or save a digital copy of the form. Based on the nature of the complaint, the USWIB EOO Designee will share the form digitally with the agency, partner, vendor, service provider or employer sponsor named in the complaint form. The complainant will be cc'd on the delivery of the form to the entity named in the complaint. Along with that email, the USWIB EOO Designee will indicate

the responsibility for investigating, replying and offering solutions to the specific complaint. It will share USWIB's engagement in tracking, facilitating and reporting on the specified complaint. The USWIB EOO Designee or designated staff will monitor the EOO process and progress of the specific complaint and share that information as necessary to the complainant, State and Federal WIOA Section 188 Compliance Designees.

In addition to this reporting and feedback from the complaint alleged entity, USWIB EOO Designee may offer assistance and facilitation to other advocate entities at the State or Federal Levels. However, the USWIB EOO Designee will not impose or determine any specific action to be taken by the complaint alleged entity. It will be the responsibility of the complaint alleged entity to follow their own policies for dealing with and resolving discrimination and harassment. Where the USWIB is not an aggrieved party, the USWIB will not impose judgement on the actual complaint alleged entity. However, the USWIB does reserve the right and responsibility to recommend dissolving a partnership or formal relationship with any entity that violates WIOA Section 188 Compliance. If corrective actions are not taken based on the complaint's merits, USWIB will take appropriate action to dissolve the formal WIOA relationship with the uncooperative entity. Note, USWIB will take these punitive actions only with the support and advice of the State and Federal Designated EOO WIOA Authorized Entities.

Key Points of the Complaint Form Process

- A. Complainant will need to file a written complaint with USWIB Administration to begin any formal investigation.
- B. Complaints directed at the USWIB, and its administrative entity will be handled directly by the USWIB Executive Director.
- C. Complaints that are directed at AJC Partners, Vendors, or other stakeholders will be handled in a two-tier approach. First, the USWIB Administration will direct and assist the complainant with filing the proper forms/complaint with the correct AJC related entity. This assistance will likely be basic referral to the proper entity. It will have a follow-up component that is focused on making sure the complainant is obtaining feedback and the required attention to their grievance. Second, in rare occasions where the complainant and/or AJC entity demonstrates any reluctance or lack of competence to handle the complaint; that instance would require USWIB operatives to assist with outreach and support to the next complaint level. In these cases, USWIB would look at the best second tier approach to resolve the outstanding issue through the appropriate entity. In these situations, the USWIB Executive Director would act as an ombudsmen or facilitator for the complainant.
- D. The Complaint must be filed in writing within 180 days of the alleged incident or infraction.

- E. The Complaint is to be filed on the approved USWIB Complaint Form (see attachment). The complaint form will need to be complete at the time of submission or through a Q&A Meeting with the Complainant and the EOO designee.
- F. Complaints lodged directly at the USWIB, and its Administration will be handled by the USWIB Executive Director. Complaints that indicate another AJC Entity or WIOA Stakeholder will be referred to the designated EO Officer for that given entity.
- G. Any complaint that meets the criteria of ***having merit*** will be filed and tracked for the benefit of a positive outcome and to ensure adequate representation is available.
- H. Where necessary, the USWIB and Executive Director will seek the advice and assistance of outside expertise or counsel to secure a positive outcome related to the complaint.

Complaint Activity Log

The USWIB has developed a WIOA Section 188 Activity Log for tracking Non-Discrimination Complaint activities. The form was developed based on guidance provided by the USDOL and MD-Labor entities responsible for WIOA Section 188 Compliance. The activity log will provide contact information related to the complainant, the nature of the complaint, dates related to filing the complaint, incident dates and disposition actions/ updates. The USWIB EOO Designee and other designated staff will maintain this activity log for easy updating and sharing with the State and Federal WIOA Section 188 Compliance Designees. Additionally, the Complaint Form and the entries to the Complaint Activity Log will be digitally added to the WIOA Title I Participant's File. The USWIB and EOO Designee will respect and maintain the required confidentiality related to the individual complainant. The confidentiality will be protected to ensure that retaliation or disruptive actions do not impact the investigation, determination and resolution related to the complaint or complainant. The disposition and description portions of the activity report will be reviewed and updated as necessary. In order to maintain a current record on each complaint, the USWIB EOO Designee or designated staff will monthly contact all complainants and the complaint alleged entity related to progress and any resolution. All updates will be available and shared with the required State and Federal WIOA EOO Designees.

Note the Complaint Activity Form protocols are as follows:

- A. The USWIB and Administration will maintain an active log that documents all complaint actions and inquiries.
- B. All information will remain confidential to the degree that its content will only be used to report activity, as requested by the State Designated WIOA EEO or EOO individual.
- C. Complaints that are referrals to other EOO Personnel or Agency/Entity Designees will be followed to ensure compliance with Section 188 and all related non-discrimination legal codes.

- D. Significant entries that expose the USWIB or Executive Director to compliance affirmation will be tracked to ensure compliance and affirmative solutions.
- E. All complaint forms and the complaint activity log(s) will be kept confidential and separate from all other WIOA Case Files and Participant data files.

Operational Process

The Complaint Activity Log will be a password protected file that will be maintained by the EOO Designee of the USWIB. The EOO Designee will only share access to their designated back-up/alternative EOO individual. The back-up EOO Designee will only handle the activity log in cases where the EOO Designee is unavailable, or the Executive Director position is vacant and therefore the EOO Designee position is vacant.

The information for the activity log will be drawn from the actual USWIB Complaint Form. Updates included in the activity report will be provided based on the status, investigation and resolution or findings. These updates will be determined by the EOO Designee or other engaged partners, vendors, staff, and stakeholders directly involved in the specific complaint case.

The USWIB plans to document inquiries concerning the complaint process when a formal complaint is filed. In addition, the activity log will contain entries that end up being an inquiry that provides specific information yet does not lead to a formal complaint filing. These informal inquiries are to be document with comment that indicates why a complaint form was not requested by the inquirer.

Updates and Additions

The Complaint Activity Log will be prepared and updated as necessary. Updates will be provided on any complaint as long as the status is pending or unresolved.

Updates will be secured through contacts with those directly involved in the complaint investigation. Typically, these contacts will be with EOO Partner, Vendor, Agency Designees. The contacts will be completely confidential. Any and all information will be retained in password protected files specifically linked with the activity log and complaint form.

Final Entries will be noted, as such, when a complaint has been resolved, withdrawn or found to lack standing.

Reporting

The USWIB and EOO Designee will follow the protocols established by the State WIOA EOO Designee for reporting Complaint Activity Logs. The USWIB EOO Designee will update the USWIB Board concerning any and all Compliant activities through an executive summary. The summary will be given in such away as to protect the confidentiality of any and all complainants.

Individual complainants will not be divulged in any open forum. However, confidential discussions may take place concerning those complainant's cases that directly involve the USWIB's board, administration or staff. When these confidential discussions take place, the USWIB Executive Board and USWIB EOO Designee will handle in a closed meeting.

The USWIB EOO Designee will contact any partners, vendors, agencies or other stakeholders that are directly involved in any case under their complaint processing purview. On these cases, the USWIB EOO Designee will maintain confidentiality and only share information as necessary. When the USWIB EOO is in contact with external parties, it will only be collecting updates and status changes in the specific complainant's case. The USWIB EOO will not advise, critique or otherwise attempt to force complaint decisions on these other EOO Designees. When the USWIB EOO Designee advises a complainant, it will be on an informational basis. The USWIB EOO will not offer opinions, critiques or legal advice to the aggrieved complainant.

Appeal Process

On complaints brought against the USWIB that specific to the non-WIOA actions of an administrator or employee will be made to the Chesapeake College HR EEO/EOO Designee. The Chesapeake College Appeal Policy will be followed in conjunction with the engagement of the USWIB Board and EOO Designee.

In the case of USWIB Appeals that involve WIOA Policy Issues, the first level of appeal will be made to the Board Chair of the USWIB. This appeal must be in writing and may be delivered via in-person, mail or email to the USWIB EOO Designee. In-turn, the EOO Designee is required to deliver the appeal to the board chair ASAP. A written evaluation of the appeal will be required by the board chair. As for the written appeal requirement, the chair's decision on appeal must be in writing to the complainant.

In cases when an appeal is filed and the appeal decision is not satisfactory to the complainant, the complainant will be offered the option of appealing to the State WIOA EEO/EOO Designee.

Concerning all appeals to the USWIB EOO Designee must be received in writing and within thirty (30) days of the complainant receiving the complain decision. Regarding all appeals directed at the USWIB Chair, a written decision by the board chair will be rendered within thirty (30) days. Complainant Appeals to other partners, vendors, agencies and other stakeholders will follow their own appeal process policies.

When the USWIB receives an appeal that is outside their WIOA Section 188 Purview, it will advise the complainant of the USWIB's limitations on said appeal. However, the written appeal will be documented and forwarded to the correct EOO Designee. The USWIB Administration will provide information on to whom the appeal is being sent along with the pertinent contact

information. From that point, the USWIB Administration will advise the appeal complainant that any and all correspondence will be between the complainant and liable entity.

Whenever the USWIB is drawn into a complaint or appeal process that is deemed WIOA Section 188 sanctioned, it will make use of legal counsel, State WIOA EOO counsel and/or USDOL WIOA EOO counsel, as necessary.

Complaint Process Access & Instruction

The USWIB and Executive Director will ensure that public access to the Complaint Process is systemwide. The WIOA EOO Designee will oversee the training and system focus points for Complaint Information, Complaint Form Access and Appeal Processing. The board supports the training and oversight necessary to ensure that staff and reception personnel are competent at delivery of WIOA Section 188 Compliance.

Initial and refresher training will be provided to all client service staff concerning the WIOA Section 188 Compliance requirements.

The training will include process and policy clarification on information concerning the Complaint Process and Complaint Form Access.

Training will distinguish between WIOA Complaint Issues and Non-WIOA Complaint Issues. Training will define and clarify the need to secure tracking and confidential information for the WIOA EOO Designee.

Training will share the significant access points within the AJC local network that includes reception staff, WIOA Counselors, Partner AJC Staff and other AJC Stakeholders.

Due diligence will be emphasized on ensuring that all actions related to protecting Complaint Rights and delivery access are provided without prejudice.

Timely and informative Complaint staff support will be emphasized to ensure deadlines are met and the access process is delivered.

Board members, partners, government representatives, vendors and other stakeholders will be educated on the WIOA Section 188 Compliance process.

Board members, partners, government representatives, vendors and other stakeholders will be solicited for committee membership and trained in the importance of the WIOA Non-Discrimination Committee's responsibilities.

The USWIB will, through the WIOA EOO Designee, explore the options for internal, system-based and external expertise in the provision of the WIOA Section 188 Compliance training.

The USWIB Executive Director will evaluate and determine the preferred process for implementation related to WIOA Section 188 Compliance.

WIOA Complaint Activity Log

The rendering below is an illustration of the items needed and samples of information that would be included within the actual WIOA Complaint Activity Log. The actual final format could be customized to meet USWIB Board and Administration needs. (see below)

WIOA Section 188 EO Activities Log													
Name	Address	Email Address	Date of Complaint	Type	Age	Sexual Conduct Harassment verbal/physical	Bullying	Participant Related	Insurance Rec'd	Gender	Ethnicity	Vendor	Complaint Status
Demographic details													
													Notes and Description
Jane Doe	101 E. Main St., Cambridge, MD, 20988	jdoe@uswib.org	5/5/21					Yes	Yes	Yes	Yes	Partner, Agency, Service Provider or Vendor	Received - Individual was explained that the criteria used to select candidates for this training required a HG Diploma or GED. Ms. Doe was given tentative approval for the training program on the condition of completing her GED Program.
John Doe	101 High St., Easton, MD, 20521	jdoe@uswib.org	5/7/21					Yes	Yes	Yes	Yes	ABE/GED - Talbot Co. Literacy Council	Jane Doe entered the AIC in Cambridge to file a racial insurance complaint. Ms. Doe stated that the registration person for Chesapeake College refused to enroll her past the late enrollment deadline. However, she witnessed another student register without being rejected. Ms. Doe believes her refusal was racially discriminatory.
													John Doe called the USWB Chesapeake College Office and wanted to file a complaint against the GED Prep Class. Jim Blank another participant makes jokes about John's speech impediment. Jim is very self-conscious. He is especially nervous speaking or reading aloud. John shared with the instructor and title has changed. The complaint was sent the complaint form via email. In turn USWB Staff related the issue to the USWB Exec. Dir. The ABE/GED Vendor for this group was notified and the USWB requested working jointly to resolve the issue.

Assessment Policy | O*Net

Upper Shore Workforce Training Scholarship Office

Assessment Policy

Date: 5/23

WIOA Title I staff utilizes the O*Net Interest Analyzer to help participants identify their work interests and identify occupations related to their interests. The scores are then used as a tool for guidance during the Career Conversation part of our process.

Assessments for participants, such as placement tests, are dependent upon the chosen training of the participant as determined by the requirements of the training provider.

Measurable Skills Gains

Measurable Skills Gains | Policy Issuance 2023-01 | January 10, 2023

[POLICY ISSUANCE 2023-01](#)



POLICY ISSUANCE 2023-01

Measurable Skill Gains | January 10, 2023

TO: Division of Workforce Development and Adult Learning (DWDAL) staff, Division of Rehabilitation Services (DORS) Staff, and Local Workforce Development Area (Local Area) Directors

FROM: DWDAL, Maryland Department of Labor (MD Labor)
DORS, Maryland State Department of Education

SUBJECT: Measurable Skill Gains

PURPOSE: To provide guidance on Measurable Skill Gains for DORS and MD Labor Workforce and Adult Education programs.

ACTION: Local Area Directors, American Job Center (AJC) Reemployment Program Directors, adult education program administrators, DORS program staff, and central office managers will ensure all employees, service providers, and vendors are aware of and receive copies of this policy. DWDAL policies are available on the [MD Labor website](#).

EXPIRATION: Until Cancelled.

QUESTIONS:

Maryland Department of Labor

Lloyd Day
Director
Office of Workforce Development
410.767.2995
lloyd.day@maryland.gov

Lauren Gilwee
Director
Policy
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Maryland Department of Education

Patrick Peto
Program Manager
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Perketer Tucker
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Stipends

Upper Shore Workforce Training Scholarship Office

Stipend Procedural Policy

Date: 7/22

Stipends are available to students as supportive reimbursements for the cost of attending training. To qualify for a training stipend, the student (participant) must not be receiving unemployment benefits. The participant will be eligible for training funds for the duration of their training. The maximum an individual may receive is \$3,000. If someone has a circumstance where this would be above this amount, the director will determine if payment will continue.

To ensure compliance, the WIOA Title I staff have established the following procedures for internal control of advancing attendance records for payment:

1. An attendance record is required. The stipend form must be used for requesting payment. Attendance forms must be received within 90 days of the last day of class participation. An instructor must sign each form for each date of attendance. The student must ensure his/her current address is reflected on the form each month. An additional question about unemployment insurance must be completed each month. Additional forms may be used if there are more dates than spaces. Due dates are listed on the stipend form.
2. Completed stipend forms can be received from students via walk in, email, or fax.
3. Staff will use the yellow file in the second filing cabinet drawer in the file room to contain forms until the due date each month.

WIOA staff will ensure stipend forms are completed for payment:

- a) Information about stipend forms will be kept in the locked file room. This information will help to determine the attendance submitted each month to prevent duplicate payments.
- b) Information about student eligibility for stipend is located on the Authorization for training form, located on MWE.
 - 1) WIOA staff will use the authorization for training to determine if a person is eligible for stipend; and to determine if the dates for the stipend are during the approved training dates.

- 2) WIOA staff will check the dates on the stipend attendance sheet; if any dates are from a prior pay period, staff will use the previous stipends to determine if the days have been paid previously.
- 3) WIOA staff will check to be sure all dates have a signature behind it and there are no duplicate dates;
- 4) WIOA staff will total the number of days approved from one (or multiple stipends sheets) submitted.
- 5) WIOA staff will verify that name and address is legible and current.
- 6) WIOA staff will check to be sure the UI is checked (as not receiving) on the stipend sheet in the proper space (receiving, not receiving);
- 7) WIOA staff will complete the bottom of the stipend sheet, insert the social security number, fund account number, and amount of stipend eligible for each day.
- 8) WIOA staff will scan all documents once forms are completed and ready to be submitted;
- 9) WIOA staff will email encrypted papers over to the grants office for payment process. This can be done more than once to allow grants office extra time to submit into the system.
- 10) The grants office will email a final summary of the participants names, account funds were deducted from, and the check number. This will be used if anyone contacts the office with questions.

If attendance sheets are submitted after the stipends have been submitted for payment, the sheets will be held and submitted the following month.

The Career Conversation exemption is to support current, full-time Municipal and County workers in enhancing their skill sets.

Stipends are available to students as supportive reimbursements for the cost of attending training. To qualify for a training stipend, the student (participant) must not be receiving unemployment benefits. The participant will be eligible for training funds for the duration of their training. The maximum an individual may receive is \$3,000. If someone has a circumstance where this would be above this amount, the director will determine if payment will continue.

To ensure compliance, the WIOA Title I staff have established the following procedures for internal control of advancing attendance records for payment:

1. An attendance record is required. The stipend form must be used for requesting payment. Attendance forms must be received within 90 days of the last day of class participation. An instructor must sign each form for each date of attendance. The student must ensure his/her current address is reflected on the form each month. An additional question about unemployment insurance must be completed each month. Additional forms may be used if there are more dates than spaces. Due dates are listed on the stipend form.
2. Completed stipend forms can be received from students via walk in, email, or fax.
3. Staff will use the yellow file in the second filing cabinet drawer in the file room to contain forms until the due date each month.

WIOA staff will ensure stipend forms are completed for payment:

- a) Information about stipend forms will be kept in the locked file room. This information will help to determine the attendance submitted each month to prevent duplicate payments.
- b) Information about student eligibility for stipend is located on the Authorization for training form, located on MWE.
 - 1) WIOA staff will use the authorization for training to determine if a person is eligible for stipend; and to determine if the dates for the stipend are during the approved training dates.

- 2) WIOA staff will check the dates on the stipend attendance sheet; if any dates are from a prior pay period, staff will use the previous stipends to determine if the days have been paid previously.
- 3) WIOA staff will check to be sure all dates have a signature behind it and there are no duplicate dates;
- 4) WIOA staff will total the number of days approved from one (or multiple stipends sheets) submitted.
- 5) WIOA staff will verify that name and address is legible and current.
- 6) WIOA staff will check to be sure the UI is checked (as not receiving) on the stipend sheet in the proper space (receiving, not receiving);
- 7) WIOA staff will complete the bottom of the stipend sheet, insert the social security number, fund account number, and amount of stipend eligible for each day.
- 8) WIOA staff will scan all documents once forms are completed and ready to be submitted;
- 9) WIOA staff will email encrypted papers over to the grants office for payment process. This can be done more than once to allow grants office extra time to submit into the system.
- 10) The grants office will email a final summary of the participants names, account funds were deducted from, and the check number. This will be used if anyone contacts the office with questions.

If attendance sheets are submitted after the stipends have been submitted for payment, the sheets will be held and submitted the following month.

Upper Shore Workforce Training Scholarship Office

Stipend Policy

Date: 7/22

As Stipends come in throughout the month:

- Receive stipend from student via walk in, email (wibstipend@chesapeake.edu), fax
- Put in the yellow file in the top filing cabinet drawer in the file room

When completing stipends for payment:

Information needed from:

- Authorization for training database on Next Cloud
 - Use the authorization for training database to determine if a person is eligible for stipend
 - Use the authorization for training database to determine the dates for the stipend are during the approved training dates. If not, contact director
 - Check the dates on the stipend. If any dates are from a prior pay, check the scanned stipends from the previous month from the file to determine if the days have been paid previously.
 - Check to be sure all dates have a signature behind it and there are no duplicate dates
 - Total the number of days approved from one or multiple stipends submitted
 - Verify that name and address is legible and current and matching information on authorization database
 - Check to be sure the UI is checked on the stipend sheet in the proper space (receiving, not receiving)
 - Complete the bottom of the stipend sheet using full social security number, account number, and amount per day
 - Scan all documents to the Nextcloud folder after completed and ready to be submitted
 - Email encrypted forms to the grants office for payment process. This can be done more than once to allow grants office extra time to submit into the system.

Upper Shore Workforce Investment Board

Incumbent Worker Training (Dorchester)

Date: 2/2023

Workforce Development Boards have been very successful in supporting incumbent worker training strategies. These strategies provide a number of positive outcomes to both business and employee. The following policy guidelines are established regarding training support for Dorchester County businesses, who have a plan or an interest for training their current working individuals.

Expected outcomes include at least one of the following:

- Improving alignment of existing workers' skills with evolving job requirements;
- Providing participants with access to new career opportunities within a business or industry;
- Encourages worker retention through the promotion of up-to-date skills training;
- Increase in the wages of incumbent participant;
- Creates new opportunities for entry-level workers by providing opportunities for promotion of existing workforce;
- Supports and enhances local and regional economic environments

The USWIB will develop an outreach program coordinated with the Dorchester Economic Development department to engage Dorchester county businesses to incentives and pay for incumbent worker training. We jointly would target 10-15 businesses, who would be interested in offering training to some of their key employees. We would develop an application, register the employees, and pay for the training from the RMDEF funds. All trainings would result in a credential that confirms completion.

Incumbent training applicants are, by definition, engaged with an employer. Employees must be currently on the company payroll, full-time and preferably eligible for benefits. The applicant must not be a contractual employee.

Training support is defined as expense reimbursements for:

1. Occupational classroom training and up-skilled certifications in a defined, career pathway;
2. Work and learn strategies that include:
 - a. Cross-training work assignments within the company;
 - b. In-house proprietary training using current employee trainers;
 - c. In-house proprietary training from outside vendors
 - d. Outside training vendors performing training at locations outside the business

These may be combined to provide a specific learning goal that relates directly to the qualification for a promoted job title and/or a defined career pathway within the company. Training expenses will be a maximum of \$5000 per company, with a \$1500 maximum individual training expense.

Training support request procedure:

The USWIB will collect information about the request directly from the business representative in order to assist in identifying a justification of the training proposal request for financial reimbursement support.

The Director will ask if the business has already provided a Maryland Business Works (MBW) request to the state, and the status of the application. A copy of the MBW application may be used as the funding request without additional paperwork.

- a. The business representative will be asked the purpose of the training regarding how the request will support the career pathway. These may include identified promotion, position upgrade, lay off aversion, and assisting with a mandatory certification upgrade or proprietary need for additional training.
- b. Consideration for Training support from a business will be based upon the funds will be assessed at a funding support cap of \$1500 per training individual. *Only the tuition portion of the training cost will be reimbursable.*
- c. Only one training contract may be approved within a fiscal year, July through June, in order to comply with the terms of the RMEDF award.
- d. The training request will be reviewed within 14 days by the Director. A decision will be determined based upon available funds, and a review of the relevant information regarding identification of the career pathway strategy.
- e. The Director will issue an approval in the form of an Authorization For Training Agreement which will define the training purpose, name of training, design

strategy, expected outcome, expected employees who will be participating, the timeframe of training, and the approved reimbursement cost. *Signatures will be required from the business and USWIB Executive Director.*

Reimbursement Process:

Once a training proposal has been approved, the business must submit an invoice for the costs of the approved tuition amount within 30 days of the completion of training. In addition, the invoice must list the employees (or as an attachment) who participated in the training and the status of his/her completion. Proof of training or credential will be required for reimbursement.

Appeal Process:

Once a training proposal has been denied, the business may appeal the decision to the Upper Shore Workforce Investment Board Executive Director. The request an appeal regarding the decision for training support, the business must direct the request in writing to:

Executive Director, USWIB

PO Box 8

Wye Mills, MD 21679

After consideration, the Executive Director will render a decision within 30 days, and will communicate the decision to the application. All decisions are contingent upon available funding.

Follow up

Upper Shore Workforce Training Scholarship Office

Training Follow Up Policy

Date: 7/22

Training Follow-up Procedures

The WIOA Title I staff are committed to ensuring compliance by documenting follow-up for all training participants who are youth (older), adults and dislocated worker participants enrolled in Title I training activities.

WIOA Title I staff provide 30- and 90-day contacts to all individuals enrolled in Title I:

- 1) In the local area, while the individual is in their training approved on the IETP, a staff person will contact them every 30 days to check on their progress and see if they need any additional help.
- 2) Once the training is complete, a contact is made with the institutional training vendor as soon as possible to corroborate the completion of the training, and to document the outcome of the activity. ***This is a requirement to validate measureable skills gain and credential.***
- 3) In order to determine the employment status of the individual, a contact is made again at the 30-day timeframe after completion of the training. This is the first post-training employment follow-up.
 - a. If the individual is employed, outcome information is entered; then, each quarter the employment information is confirmed and documented both with the individual and with the employer.
 - b. If not employed, a quarterly follow-up contact is completed in MWE and contact is made for each quarter thereafter for one year. Title I staff also relay any relevant employment opportunities, hiring events and other available workshop schedules (*free and open to all citizens*) to maximize access to employment opportunities. Staff encourage unemployed individuals to seek additional assistance at the local American Job Center.

Data Validation

Upper Shore Workforce Training Scholarship Office

Data Validation Policy

Date: 7/22

The following policy guidelines are hereby established regarding data validation documentation regarding training participant files:

DOL Eligibility documents: to be used to direct WIOA Title I staff when validating documents for WIOA Title I program eligibility:

Citizenship: ability to work in the US (two documents required)

a. Proof of citizenship

- i. Birth certificate: the original birth certificate with the foot/feet and a stamp with date
- ii. Certificate of live birth: verify birth year matches issuing code
- iii. Passport: in small blue bond booklet; picture of individual, birth date and citizenship status; refer to “Guide To Selected US Travel” located in the Office of Records in WIOA Title I main office for various types of passports
- iv. DD214: the form is two pages, front-to-back, ssn matches ss information, has member signature and official military authority; includes pay rank and pay grade, date of birth, termination date and last duty assignment.

b. Social Security Number

- i. Social security card
- ii. Passport: in small blue bond booklet; picture of individual, birth date and citizenship status; refer to “Guide To Selected US Travel” located in the Office of Records in WIOA Title I main office for various types of passports
- iii. Pay stub: must have social security number on pay stub

Note: Other documents can be used to validate citizenship according to DOL Issuance policy attached

2. Age: specific to the programs for adults or youth eligibility

- a. Birth certificate
 - i. Birth certificate: the original birth certificate with the foot/feet and a stamp with date
 - ii. Certificate of live birth: verify birth year matches issuing code
 - iii. Passport: in small blue bond booklet; picture of individual, birth date and citizenship status; refer to “Guide To Selected US Travel” located in the Office of Records in WIOA Title I main office for various types of passports

Note: Other documents can be used to validate age according to DOL Issuance policy attached

3. Selective Service: males only

- a. Selective service card: has SSS seal at top left corner; birth date matches birth and age of male; last four digits of SSN card or other documents;
- b. Registration acknowledgement: full page with SSS seal, last four digits of SSN match SS card; date of birth matches other age and birth documents;
- c. Sss.gov website: print out verification or when no registration for file

Note: If not registered: under 26 year of age, pull up registration page and have him register. If over 26 years of age follow selective service policy

4. Veteran

- a. DD214: the form is two pages, front-to-back, SSN matches SS information above; has member signature and official military authority; includes pay rank and pay grade, date of birth, termination date and last duty assignment.

Note: If using DD214 for other eligibility validation note what it is being used for

Income Eligibility

1. Adult

- a. Pay stub: name match, date, pay amount (time period covered); company name, address
- b. W-2: name match, date, pay amount (time period covered); company name, address
- c. 1099: name match, date, pay amount (time period covered)
- d. SNAP/TCA verification: Identifying DSS information on paper, case number for the participant is included, name match
- e. Applicant Statement: should include

- i. Date statement is prepared
- ii. Signature of both applicant and WIOA staff member
- iii. Statement of responsibility: This is a sentence stating that the applicant is responsible for the accuracy of his/her statement, i.e. “I understand that I am responsible for the accuracy of this statement, and that any falsehood will result in termination from the program I am applying for.”
- iv. Statement should indicate what document the applicant statement is being substituting for; i.e. “This statement is to verify that I am currently unemployed, and I do not have a current unemployment insurance statement or pay stuff from the unemployment office.”

2. Youth

- a. See eligibility policy for youth portion as there are a variety of ways a youth qualifies
- b. Barriers to employment list

3. Dislocated worker

- a. Unemployment verification: letter, print out from BEACON site
- b. Newspaper article published about lay-off
- c. Applicant statement about layoff status

General Rules for collecting the above documentation

- Individual uploads their documents on MWE (state program)
- Individual goes to American Job Center and has staff assist with the scanning of the documents
- Do not use white out for any changes. When needing to correct and error, cross through the error and write the correct date or change next to the incorrect entry. Write your initials next to the change and the date you made the change.
- If the information you are viewing is not legible – or some numbers are hard to read- do not write in the number. Use the applicant statement to have the applicant tell you what the number is and sign your name that this is what he/she tells you on the applicant statement.
- Use the guidelines on page one to determine document validity and authenticity to the best of your ability.
- If you have concerns about a document, ask the customer to initial the documents to verify that to his/her knowledge, these are legitimate documents being submitted to WIOA Title I staff. Concerns should be forwarded or brought directly to the attention of the director.

WIOA Title I staff should contact the main office for questions regarding any unique documentation for verifying eligibility purposes.

Maryland Department of Labor: Policy Issuance 2022-1 Data Validation

LINK: <https://www.dllr.state.md.us/employment/mpi/mpi1-22.pdf>



POLICY ISSUANCE 2022-1

Data Validation | February 4, 2022

TO: Division of Workforce Development and Adult Learning (DWDAL) staff and Local Workforce Development Area (Local Area) Directors

FROM: DWDAL
Maryland Department of Labor (MD Labor)

SUBJECT: Data Validation

PURPOSE: To provide the guidance on data validation procedures for MD Labor workforce programs.

ACTION: Local Area Directors, American Job Center (AJC) Labor Exchange Administrators, and central office managers will ensure all employees, service providers, and vendors are aware of and receive copies of this policy. DWDAL policies are available [on the MD Labor website](#).

EXPIRATION: Until Cancelled.

QUESTIONS:

Maryland Department of Labor

Lloyd Day
Director
Office of Workforce Development
410.767.2995
lloyd.day@maryland.gov

Lauren Gilwee
Director
Policy
410.916.7209
lauren.gilwee@maryland.gov

Carolyn Mitchell
Director
Office of Workforce Information and
Performance
410.767.2953
carolyn.mitchell@maryland.gov

Perketer Tucker
Acting Director
Office of Adult Education and
Literacy Services
410.767.4150
perketer.tucker@maryland.gov

Maryland Department of Education

Patrick Peto
Program Manager
Division of Rehabilitation Services
410.554.9536
patrick.peto@maryland.gov

Additional Training

Upper Shore Workforce Training Scholarship Office

Second Training Request

Date: 6/23

Second Training funding request is to be used when an individual has completed the initial training and is requesting a second training in a different career field.

Staff will:

- a. Direct the participant to submit his/her request using the additional training request questionnaire. This questionnaire includes previous training information, initial training experience and employment in regards to initial training. The questionnaire also includes the reason why the change in career request.
- b. The individual must complete the eligibility and career conversation portion of the process. If the individual is deemed eligible, the Assistant Director will determine if the additional funds are approved.
- c. Training support consideration from former participants will be based upon exit data regarding employment and the ability of the participant to remain employed. Priority will be given to those who have exited with a job and are among those in the retention-tracking component. Support for these returning students will be considered if there are adequate training funds available.

Appeal Process

If an additional request for training has been denied, an individual may appeal the decision to the Upper Shore Workforce Investment Board Executive Director. An appeal regarding additional training must be in writing and sent to:

*Daniel Schneckenburger, Executive Director
Upper Shore Workforce Investment Board
PO Box 8, Wye Mills, MD 21679*

*After consideration, the Executive Director will render a decision within 30 days and will communicate the decision to the applicant. **All decisions contingent upon available funding.***

Incumbent Worker

Upper Shore Workforce Training Scholarship Office

Incumbent Worker Funds Policy

Date: 7/22

Section 134 of WIOA allows the Workforce Development Board to use formula funds to pay for incumbent worker training strategies. These strategies provide a number of positive outcomes to both business and employee. The following policy guidelines are established regarding training support for business who has a plan for training their current working individuals.

Expected outcomes include at least one of the following:

- Improving alignment of existing workers' skills with evolving job requirements;
- Providing participants with access to new career opportunities within a business or industry;
- Encourages worker retention through the promotion of up-to-date skills training;
- Increase in the wages of incumbent participant;
- Creates new opportunities for entry-level workers by providing opportunities for promotion of existing workforce;
- Supports and enhances local and regional economic environments

The staff will develop an allocation budget to meet the request. **All decisions are contingent upon available funding.**

Incumbent training applicants are, by definition, engaged with an employer. Employees must be currently on the company payroll, full-time and preferably eligible for benefits. The applicant must not be a contractual employee.

Training support is defined as expense reimbursements for:

3. Occupational classroom training and up-skilled certifications in a defined, career pathway;
4. Work and learn strategies that include:
 - a. Cross-training work assignments within the company;
 - b. In-house proprietary training using current employee trainers;
 - c. In-house proprietary training from outside vendors

- d. Outside training vendors performing training at locations outside the business

These may be combined to provide a specific learning goal that relates directly to the qualification for a promoted job title and/or a defined career pathway within the company.

Training support request procedure:

The director will collect information about the request directly from the business representative in order to assist in identifying a justification of the training proposal request for financial reimbursement support.

The Director will ask if the business has already provided a Maryland Business Works (MBW) request to the state, and the status of the application. A copy of the MBW application may be used as the funding request without additional paperwork.

Note: Request from businesses will be considered only after all other relevant and available funds have been exhausted

- f. The business representative will be asked the purpose of the training regarding how the request will support the career pathway. These may include identified promotion, position upgrade, lay off aversion, and assisting with a mandatory certification upgrade or proprietary need for additional training.
- g. Consideration for Training support from a business will be based upon the matching financial support from the business with a commitment of at least 50% of the funds associated with tuition portion of the training. Title I funds will be assessed at a funding support cap of \$1500 per training individual. *Only the tuition portion of the training cost will be reimbursable.*
- h. Only one training contract may be approved within a fiscal year, July through June, in order to comply with annual budget allocations.
- i. The training request will be reviewed within 14 days by the Director. A decision will be determined based upon available funds, and a review of the relevant information regarding identification of the career pathway strategy.
- j. The Director will issue an approval in the form of an Authorization For Training Agreement which will define the training purpose, name of training, design strategy, expected outcome, expected employees who will be participating, the timeframe of training, and the approved reimbursement cost. *Signatures will be required from the business and WIB Executive Director.*

Reimbursement Process:

Once a training proposal has been approved, the business must submit an invoice for the costs of the approved tuition amount within 30 days of the completion of training. The invoice must include the cost-matching information regarding at least 50% match from the business. In addition, the invoice must list the employees (or as an attachment) who participated in the training and the status of his/her completion.

Appeal Process

Once a training proposal has been denied, the business may appeal the decision to the Upper Shore Workforce Investment Board Executive Director. To request an appeal regarding the decision for training support, the business must direct the request in writing to:

Daniel Schneckenburger, Executive Director
Upper Shore Workforce Investment Board
PO Box 8, Wye Mills, MD 21679

After consideration, the Executive Director will render a decision within 30 days and will communicate the decision to the application. ***All decisions are contingent upon available funding.***

Upper Shore Workforce Investment Board

Incumbent Worker Training (Dorchester)

Date: 2/2023

Workforce Development Boards have been very successful in supporting incumbent worker training strategies. These strategies provide a number of positive outcomes to both business and employee. The following policy guidelines are established regarding training support for Dorchester County businesses, who have a plan or an interest for training their current working individuals.

Expected outcomes include at least one of the following:

- Improving alignment of existing workers' skills with evolving job requirements;
- Providing participants with access to new career opportunities within a business or industry;
- Encourages worker retention through the promotion of up-to-date skills training;
- Increase in the wages of incumbent participant;
- Creates new opportunities for entry-level workers by providing opportunities for promotion of existing workforce;
- Supports and enhances local and regional economic environments

The USWIB will develop an outreach program coordinated with the Dorchester Economic Development department to engage Dorchester county businesses to incentives and pay for incumbent worker training. We jointly would target 10-15 businesses, who would be interested in offering training to some of their key employees. We would develop an application, register the employees, and pay for the training from the RMDEF funds. All trainings would result in a credential that confirms completion.

Incumbent training applicants are, by definition, engaged with an employer. Employees must be currently on the company payroll, full-time and preferably eligible for benefits. The applicant must not be a contractual employee.

Training support is defined as expense reimbursements for:

5. Occupational classroom training and up-skilled certifications in a defined, career pathway;
6. Work and learn strategies that include:
 - a. Cross-training work assignments within the company;
 - b. In-house proprietary training using current employee trainers;
 - c. In-house proprietary training from outside vendors
 - d. Outside training vendors performing training at locations outside the business

These may be combined to provide a specific learning goal that relates directly to the qualification for a promoted job title and/or a defined career pathway within the company. Training expenses will be a maximum of \$5000 per company, with a \$1500 maximum individual training expense.

Training support request procedure:

The USWIB will collect information about the request directly from the business representative in order to assist in identifying a justification of the training proposal request for financial reimbursement support.

The Director will ask if the business has already provided a Maryland Business Works (MBW) request to the state, and the status of the application. A copy of the MBW application may be used as the funding request without additional paperwork.

- k. The business representative will be asked the purpose of the training regarding how the request will support the career pathway. These may include identified promotion, position upgrade, lay off aversion, and assisting with a mandatory certification upgrade or proprietary need for additional training.
- l. Consideration for Training support from a business will be based upon the funds will be assessed at a funding support cap of \$1500 per training individual. *Only the tuition portion of the training cost will be reimbursable.*
- m. Only one training contract may be approved within a fiscal year, July through June, in order to comply with the terms of the RMEDF award.
- n. The training request will be reviewed within 14 days by the Director. A decision will be determined based upon available funds, and a review of the relevant information regarding identification of the career pathway strategy.

- o. The Director will issue an approval in the form of an Authorization For Training Agreement which will define the training purpose, name of training, design strategy, expected outcome, expected employees who will be participating, the timeframe of training, and the approved reimbursement cost. *Signatures will be required from the business and USWIB Executive Director.*

Reimbursement Process:

Once a training proposal has been approved, the business must submit an invoice for the costs of the approved tuition amount within 30 days of the completion of training. In addition, the invoice must list the employees (or as an attachment) who participated in the training and the status of his/her completion. Proof of training or credential will be required for reimbursement.

Appeal Process:

Once a training proposal has been denied, the business may appeal the decision to the Upper Shore Workforce Investment Board Executive Director. The request an appeal regarding the decision for training support, the business must direct the request in writing to:

Executive Director, USWIB

PO Box 8

Wye Mills, MD 21679

After consideration, the Executive Director will render a decision within 30 days, and will communicate the decision to the application. All decisions are contingent upon available funding.

Maryland Business Works | Policy Issuance 2021-02 | Workforce Development and Adult Learning

[POLICY ISSUANCE 2021-02](#)



POLICY ISSUANCE 2021-02

Maryland Business Works | February 8, 2021

TO: MD Labor - Division of Workforce Development and Adult Learning staff and Local Workforce Development Area Directors

FROM: Division of Workforce Development and Adult Learning (DWDAL) Maryland Department of Labor (MD Labor);

SUBJECT: Maryland Business Works

PURPOSE: To provide policy guidance on the Maryland Business Works Program.

ACTION: Local Workforce Development Area Directors, American Job Center MD Labor Exchange Administrators, and central office managers will ensure all employees are aware of and receive copies of this policy. DWDAL policies are available [on the MD Labor website](#).

EXPIRATION: Until cancelled or replaced

QUESTIONS:

Lauren Gilwee, Director
Policy
MD Labor
410.916.7209
lauren.gilwee@maryland.gov

Lloyd Day, Director
Office of Workforce Development
MD Labor
410.767.2995
lloyd.day@maryland.gov

Apprenticeship

Upper Shore Workforce Training Scholarship Office

Apprenticeship Funding Policy

Date: 7/22

The following policy guidelines are hereby established regarding training support for those business partners who are ready and able to hire individuals in an apprenticeship capacity. WIOA Title I adult and dislocated worker funding will make funding available to support costs of classroom training where a business has registered for apprenticeship positions. **All decisions are contingent upon available funding.**

The apprenticeship model incorporates a rigorous classroom component with hands-on, experiential components that are tracked using an hours-by-learning guide, developed through industry professionals regarding what qualifies as a credential for any specific job title. Experience is benchmarked over a set period where professionals, tutors, trainers, and instructors, combine training with classroom learning attainment.

The business will communicate that a job qualifies as a registered apprenticeship. Individuals may be referred to the business for hire as an “apprentice”. The apprentice must be an employee, whether a new hire or incumbent worker, he/she will register for a specific attainment job title apprentice, and enroll in MWE for the training component. With his/her enrollment, that participant will be eligible for books, uniforms, fees and other classroom training costs, supported with WIOA funds. Hands-on practice, work experience, and training on the job components expenses will be supported by the employer.

Training support for this policy is classified as work-based learning (WBL), or Earn and Learn. WBL includes occupational training and up-skilled certifications, as well as on-the-job training (OJT), customized training, apprenticeships, and internships. The apprenticeship may be combined to provide a specific learning goal that relates directly to qualification for a job title and/or career pathway. Priority will be given to those training requests that result in a wage gain, promotion, or layoff aversion plan.

- I. **Training support request protocol:** to be used to direct WIOA staff when current or existing training participants have requests for additional training after they have completed a WIOA funded training plan, and also for those

individual worker requests who may not otherwise qualify under the Title I allocations. These individuals will follow the protocol given under the Second Training Request Policy.

- II. **Employer Contacts:** If an employer contacts the office to request training for their employees, the staff will explain that the WIOA office works with individuals, not businesses. Therefore, have the individuals contact us for training funds.

The consideration of posting job recruitment flyers, job fairs, and any events on the website is subject to the approval and best judgement of the Director, Title I. Whereas, the boosting of events is subject to the approval of the Executive Director, USWIB.

Note: Support for any federal illegal substances is strictly prohibited; no WIOA funding can be used to support recruitment, promotion, or training for local entities who trade in these products.

Appeal

For those who wish to appeal the decisions of the Director, WIOA Title I or of the decisions of the Executive Director regarding boosting, may submit written information to:

Dan Schneckenburger, Executive Director
Upper Shore Workforce Investment Board
PO Box 8, Wye Mills, MD 21679

Miscellaneous

Upper Shore Workforce Training Scholarship Office

Financing Course Once Policy

Date: 5/23

The Scholarship office will fund a participant one time only for a training course. If the participant must take the course again, for a circumstance out of their control, the individual will complete and submit an Additional Training Request Questionnaire to the Title I Director. A determination will be made, after any further investigation needed, and a written response will be given to the individual within 30 days.

Appeal

For those who wish to appeal the decisions of the Director, WIOA, Title I regarding consideration for funding may submit written request to the Executive Director at Upper Shore Workforce Investment Board.

Dan Schneckenburger, Executive Director
Upper Shore Workforce Investment Board
PO Box 8, Wye Mills, Maryland 21679

Any federally allocated funds (for scholarship and/or stipends, books, supplies etc.) spent on a staff's family member must not include any interaction with that staff member. If a family member applies for funds from any funding source, the staff member may not have any interaction or approval for those funds. The paperwork must be signed and submitted by another staff member in the office.

For the purpose of this policy and in accordance to Chesapeake College's Faculty Manual the term family member is described as:

"persons related by family or marriage are defined as spouse/partner or significant other, parent, child, individual who has been assigned legal responsibility in a guardianship capacity, sibling, grandparent, grandchild, aunt, uncle, niece, nephew, and in-laws" (Section 7 – Human Resources: Instructions of Relatives part B)

General Information

The Workforce Opportunity and Innovation Act (WIOA) offers an integrated and comprehensive range of services for job seekers, including adults, dislocated workers, youth, incumbent workers, new entrants to the workforce, veterans, and individuals with disabilities, and employers. The Act's objective is to meet employers' needs by increasing employment, job retention, earnings, and occupational skills levels among all job seekers populations in the local economic region. In addition, a full commitment to supporting the American Job Center in each of the five counties in the upper shore, and is central to ensuring these goals are attained.

Staff Mileage Reimbursement

The WIOA Title I funds follow the compliance of their fiscal agent, Chesapeake College, whenever possible. Chesapeake College's mileage reimbursement policy states:

“Employees may use their own vehicles for authorized travel and be reimbursed at the approved IRS rate in place at the time of the travel. For travel on college work days, mileage will be computed less the employee’s normal obligation to travel to and from his work station. On all other days, the mileage reimbursement will be computed based on the actual miles traveled. When personal cars are used for authorized travel, the employee’s insurance carrier will be responsible for any liability or expense arising out of an accident while on travel status.”

This policy will be applicable to all full time, part time, and temporary employees of the WIOA Title 1 Staff. The exception to the Chesapeake College policy could be the location of the work station. This location could be any of the five American Job Centers in the upper shore region. The employee would use this assigned location for the calculation of mileage in these instances. A section of the mileage reimbursement form, used by all employees, includes an area for individuals to write their assigned location.

General Information

The Workforce Opportunity and Innovation Act (WIOA) offers an integrated and comprehensive range of services for job seekers, including adults, dislocated workers, youth, incumbent workers, new entrants to the workforce, veterans, and individuals with disabilities, and employers. The Act's objective is to meet employers' needs by increasing employment, job retention, earnings, and occupational skills levels among all job seekers populations in the local economic region. In addition, a full commitment to supporting the American Job Center is central to ensuring these goals are attained. To that end, we have begun to use social media to assist in promoting the AJC.

Social Media

This is an informal way to ensure we are doing our part to encourage those who need employment and training to visit the AJC.

Title I Staff will ensure only appropriate messages and flyers are posted on Facebook and the website. Individual staff have the responsibility of ensuring only appropriate messages, pictures and attachments are fitting and relevant to employment and training events, recruitment and or other announcements that would benefit those who need such services.

In addition, we also support those employers in the area who are recruiting. Job openings and job fairs are posted on Facebook once a week. When an American Job Center partner coordinates a job fair, the WIOA staff can promote the job fair and "boost" the advertisement on Facebook. Because the boosting costs money, the criteria for WIOA support of ***boosting*** is as follows:

1. The recruitment is an American Job Center event -i.e. organized and coordinated through one or more of the partners in the local AJC.

2. The recruitment is sponsored by a government organization -i.e. organized and coordinated through any agency in the state of Maryland, any of the local five counties in the upper shore, and/or the federal government entities under the departments of Labor, Human Services, and Education.
3. A coordinated effort for recruitment through Chesapeake College, as in the annual Career & Job Expo, Healthcare Career & Job Fair, Manufacturing Career & Job Fair, etc.
4. Specific employers that the local DWDAL business staff is working with in conjunction with any of the organizations in #2.
5. Other events, not specifically for employment and training that promote the availability and resources in the local American Job Centers in the five county area -i.e. community events, homeless day events, etc.

The consideration of posting job recruitment flyers, job fairs and any events on the listserv is subject to the approval and best judgment of the Director, Title I. Whereas, the boosting of events is subject to the approval of the Executive Director, USWIB.

Note: Support for any federal illegal substances is strictly prohibited; no WIOA funding can be used to support recruitment, promotion or training for local entities who trade in these products.

Appeal

For those who wish to appeal the decisions of the Director, WIOA Title I or of the decisions of the Executive Director regarding boosting, may submit written information to:

Dan Schneckenburger, Executive Director
Upper Shore Workforce Investment Board
PO Box 8, Wye Mills, MD 21679

General Information

The Workforce Opportunity and Innovation Act (Opportunity Act) local Workforce Development Board and Chesapeake College Title I *staff* adhere to compliance regarding the care and stewardship of Personally Identifiable Information (PII), collected for data validation and eligibility compliance. This care is taken seriously in the Chesapeake College (campus) offices, which are the office of record (OOR).

All documents that are required to comply with data validation expectations and requirements for Title I Eligibility are collected and consequently reside in the Chesapeake College OOR. The OOR is a locked area, and within this area records are held in locked file cabinets. A lock box has been installed in this area where keys are held under a combination lock.

Staff will not collect any information that is not presented on-site, at the Chesapeake College campus, and will not travel outside Chesapeake College with any documents that contain PII at any time.

Any questions about the practices and procedure for this policy may be addressed to Daniel Schneckenburger, Executive Director.

APPENDIX I

FORMS AND QUESTIONNAIRES

APPLICATION

- Scholarship Application: [Printable](#) | [Fillable](#)

INTAKE

- Applicant Statement: [Printable](#) | [Fillable](#) 2/2024
- Complaint Procedure: [Fillable](#) 2/2024
- EEO Form: [Fillable](#)
- O*NET Instructions for Customer: [Printable](#)
- Training Funds Qualifying Questionnaire: [Printable 6/2023](#)
- WIOA Application: [Printable](#) | [Fillable](#)
- Youth - Adverse Childhood Experience, ACE Questionnaire: [Fillable](#)
- Required Eligibility Verification: [WA & WD: Printable](#) | [OSY Check Off: Printable](#)
- Selective Service Registration Waiver Request Form: [Fillable](#)

CAREER CONVERSATION

- Career Conversation Questionnaire: [Doc](#) | [pdf](#)
- Individual Employment Training Plan (IETP): [Fillable](#)
- Stipend Qualifying Form: [Fillable 9/2022](#)
- Customer Choice Letter: [Fillable 8/2023](#)

YOUTH PROGRAM

- Transportation Permission Form: [pdf](#)
- Objective Assessment Program Elements: [pdf](#)
- EEO Form: [pdf](#)
- Photography of Minor Authorization, Release and Agreement Form: [pdf](#)
- WIOA Application: [Printable](#) | [Fillable](#)
- Abacus Weekly Timesheet: [pdf](#)
- Applicant Statement: [Printable](#) | [Fillable](#)
- Verification of Family Size: [pdf](#)
- Accident Waiver & Release of Liability Form: [pdf](#)
- Complaint Procedures: [Fillable](#)
- Interview Questions: [pdf](#)
- Youth Individual Service Strategy (ISS): [pdf](#)
- Employer Information Form: [pdf](#)

